From: Haidee McCabe
To: Mailroom Mailbox
Cc: "Brent Schrider"; Georgina Hamilton; Lucy Millar
Subject: Temuka Catchment Working Party - PC7 Submission
Date: Thursday, 12 September 2019 6:08:51 PM
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Please find attached submission made on PC7, on behalf of Temuka Catchment Working Party

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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 Temuka Catchment Working Party (**TCWP**)

Address: c/Irricon Resource Solutions
Attn: Haidee McCabe
PO Box 2193
Washdyke, Timaru

Contact: Haidee McCabe

Email: haidee@irricon.co.nz

Trade competition statement:

2 The TCWP 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 (**OTOP**) sub-region component of PC7) in its entirety.

Wish to be Heard:

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

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

Submission:

<u>Background to the TCWP</u>

7 The TCWP was formerly established during the collaborative planning process for PC7 at the request of Environment Canterbury (**ECan**) in June 2018 with the OTOP Zone Committee's endorsement. Given the significance and severity of the issues facing the Temuka catchment in relation to water quality and quantity, the formalisation of a group representing the interests of consent holders in the catchment and other key stakeholders was seen by ECan and the OTOP Zone Committee as an essential step in the development of a community-led solutions package for the Temuka catchment.

8 The membership of the TCWP has not changed since its establishment, and comprises:

8.1 Timaru District Council representative (Judy Blakemore);

8.2 Central South Island Fish and Game Council representative (Mark Webb);

8.3 Barkers Fruit Processors Limited (Barkers) representative;

8.4 OTOP Zone Committee representative (Glen Smith); and

8.5 Members of Temuka Catchment Group Incorporated, an incorporated society representing the interests of consent holders in the Temuka catchment.

9 In addition to the above, a representative of the Department of Conservation attended some of the initial TCWP meetings. TCWP meeting invitations and correspondence were also copied to representatives of Te Rūnanga of Arowhenua.

10 In addition to the support provided by ECan technical and planning staff during the collaborative planning process, the TCWP has been supported by the following consultants:

10.1 Irricon Resource Solutions (Keri Johnston and Haidee McCabe – water resources engineering/environmental planning); and

10.2 Ryder Consulting (Dr Greg Ryder – environmental scientist/freshwater ecologist)

11 The primary role of the TCWP was to work with ECan staff to develop a preferred environmental flow, allocation and partial restriction regime for the Temuka catchment for submission to the OTOP Zone Committee for consideration in the development of its Zone Implementation Programme (**ZIPA**). This was achieved over a five month period, with the TCWP submitting its preferred regime to the Zone Committee on 31 October 2018.

12 Informed by hydrological, ecological, cultural and economic considerations, the TCWP's preferred regime recognised that a long-term solution was needed for the Temuka catchment as the complexity of issues and the challenges they present for the future management of its freshwater resources could not be resolved in the short-term. The TCWP's regime therefore proposed change for the catchment by way of time-staged steps to achieve the necessary environmental improvements and the Zone Committee's aspirations for the catchment.

13 The TCWP's preferred regime was largely incorporated in the December 2018 ZIPA, and has since been carried through into PC7.

14 However, the ZIPA (and now PC7) brought forward the TCWP's preferred fourth and final "step", which comprised further increases in environmental flows, decreases in allocation and the introduction of pro-rata partial restrictions for A and B permits, from 2040 to 2035. This key element of the TCWP's preferred regime recognised that the success of the regime was contingent on alternative sources of water supply being secured to replace existing surface water and stream depleting groundwater takes in the Temuka catchment, and that the timeframe out to 2040 was needed to enable that to occur and the intended allocation reductions to be achieved. The TCWP remains of the view that further time is essential for this further step to be implemented.

Summary of TCWP's position on PC7

15 The TCWP acknowledges that substantial time-staged changes to the current environmental flow, surface water allocation limits and partial restrictions in the Temuka Freshwater Management Unit (**Temuka FMU**) are necessary to achieve the directives of the applicable higher order planning instruments in relation to over-allocation of surface water resources in particular. For that reason, the TCWP generally supports the principles underpinning the environmental flow, allocation and partial restriction regimes proposed in Tables 14(i) – (l) of Section 14.6.2, and the implementing policies and rules in PC7.

16 However, the TCWP considers amendments are required to PC7 to (summarily):

16.1 Recognise the severity of the effects of the proposed environmental flow, allocation and partial restriction regime for the Temuka FMU under PC7 on the financial viability and profitability of the farm businesses within the Temuka FMU, and consequently provide an appropriate amount of time to enable those businesses to adapt to the changes in environmental flow and allocation regimes proposed by PC7 and/or enable alternative sources of water supply to be secured prior to such changes taking effect;

16.2 Include additional mechanisms to incentivise consent holders to voluntarily reduce allocation and enable the global management of consented water within the Temuka FMU;

16.3 Recognise the significance of the Barkers processing operations for the Temuka FMU in terms of employment opportunities and the economic prosperity of the wider OTOP sub-region;

16.4 Improve the clarity and workability of the policy and rule framework under PC7, including through amendments to definitions and new definitions;

16.5 Address various technical errors or omissions;

16.6 Provide greater consistency in terminology; and

16.7 Otherwise ensures that PC7:

(a) implements the OTOP ZIPA;

(b) achieves the directives of relevant higher order planning instruments; and

(c) represents the most appropriate plan provisions in terms of section 32 of the Resource Management Act 1991 (**RMA**);

17 The TCWP's specific concerns in respect of PC7 are set out in detail in **Annexure A** to this submission, together with a summary of the changes to PC7 it considers are necessary to address those concerns.

Decisions sought by the TCWP:

18 The TCWP seeks the following decisions from Environment Canterbury:

18.1 That the decisions sought in **Annexure A** to this submission be accepted; and/or

18.2 Alternative amendments to the provisions of PC7 to address the substance of the concerns raised in this submission; and

18.3 All consequential amendments required to address the concerns raised in this submission and ensure a coherent planning document.

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By **Haidee McCabe** for and on behalf of the Temuka Catchment Working Party

Date: 13 September 2019

ANNEXURE A: SUBMISSIONS OF AND DECISIONS SOUGHT BY THE TEMUKA CATCHMENT WORKING PARTY

(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				Changes proposed are identified with strike outs and in ***bold italics*****,** or as a detailed decision sought.
Pg 122	Temuka Freshwater Management Unit (**Temuka FMU**)	Oppose in part	The description of the Temuka FMU needs to acknowledge the relationship between the Temuka river and the Opihi River i.e. that in the lower catchment the Temuka River joins the Opihi River.	Amend the introductory narrative for the Temuka FMU by adding the words: ***The Temuka FMU joins the Opihi River in the lower catchment approximately 3km upstream of the Opihi River mouth.***
Pg 123	Groundwater FMU	Support	The TCWP supports the introductory narrative for the Groundwater FMU.	Retain the introductory narrative for the Groundwater FMU as notified.
Pg 127	Definitions	Oppose in part	A Mataitai Protection Zone has been identified that comprises a substantial portion of the lower Temuka catchment and tributaries. While the TCWP recognises the Temuka catchment's cultural importance, it seeks a clear explanation of the values that the Mataitai Protection Zone is intended to recognise and protect. In the TCWP's view, this is required to provide certainty for future plan users and administrators and essential to the implementation of PC7. The TCWP notes that an explanation of the underlying legislative/regulatory basis for the associated "mataitai reserve" is provided in the "Ngai Tahu" section of the Canterbury Land and Water Regional Plan (**LWRP**), page 22, however, the LWRP as proposed to be amended by PC7 is otherwise lacking	Amend PC7 to include further clarification of the intended purpose of the Mataitai Protection Zone either by way of an amended definition or policy.

			any further explanatory material to assist plan users understand how their activities might affect values sought to be recgonised and protected by the proposed "Mataitai Protection Zone".	
14.1A - Pg 126-128	New Definitions	Oppose in part	Definitions are crucial to the successful implementation of regional plans, however there are no clear definitions for A, B and C permits in the Temuka FMU, despite these terms being referred to throughout PC7. The Opihi River Regional Plan (**ORRP**) had allowed historically for the granting of A and B water within the Temuka catchment, with set allocations and flow levels at Manse Bridge. This needs to follow through into this plan change, and clarity also provided on the meaning of the term "C" water permits, which is introduced by PC7. In summary, the TCWP considers new definitions of these terms should be included in PC7 that link to the Temuka FMU and are otherwise based on the following: • "A" Permits: Granted prior to 1 January 1999; • "B" Permits: Granted after 1 January 1999; • "C" Permits: Granted after the notification of PC7 in relation to allocation from the "C" block established by Table 14(k). In the TCWP's view, PC7 would also benefit from a "Mahinga Kai Enhancement" definition, and greater consistency in wording used in PC7 as currently there seems be conflicting references to "Cultural Allocation" (which the TCWP assumes is the same as "Mahinga Kai Enhancement") throughout Section 14.	Include the following new definitions for the terms "A Permit", "B Permit" and "C Permit" relating to water permits in the Temuka catchment and referred to in Tables 14(i) to (l): ***A Permit – means in the Temuka Freshwater Management Unit as shown on the planning maps, a water permit to take and use water, or groundwater with a direct, high or moderate stream depletion effect, that was granted prior to 1 January 1999 (and includes any variation to that consent under Section 127 of the RMA, any transfer (in whole or part) under Section 136 of the RMA, and any replacement consent affected by the provisions of Sections 124-124C of the RMA).*** ***B Permit –means in the Temuka Freshwater Management Unit as shown on the planning maps, a water permit to take and use water, or groundwater with a direct, high or moderate stream depletion effect, that was granted after 1 January 1999 but before 20 July 2019 (and includes any variation to that consent under Section 127 of the RMA, any transfer (in whole or part) under Section 136 of the RMA, and any replacement consent affected by the provisions of Sections 124-124C of the RMA).*** ***C Permit – means in the Temuka Freshwater Management Unit as shown on the planning maps, a water permit to take and use water, or groundwater with a direct, high or moderate stream depletion effect, from the "C" allocation in Table 14(k) that was granted after 20 July 2019 (and includes any variation to that consent under Section 127 of the***

				RMA, any transfer (in whole or part) under Section 136 of the RMA, and any replacement consent affected by the provisions of Sections 124-124C of the RMA). ***Mahinga Kai Enhancement – means in the Temuka Freshwater Management Unit, relates to a water permit to take and use of water, or groundwater with a direct, high or moderate stream depletion effect, for the enhancement of the customary gathering of food and/or natural materials and the places where those resources are gathered.*** Amend Heading in Table 14(i) and 14(l) to replace the term "Cultural Allocation" with *"**Mahinga Kai Enhancement Allocation".***
14.4 Pg131	Tangata Whenua Policy 14.4.2	Oppose in part	The TCWP understands the Temuka catchment is of cultural importance which needs to be recognised and protected. However, it is unclear what the reference to "culturally significant sites" in Policy 14.4.2 is intended to mean, especially when considering the detailed policies 14.4.3-14.4.5. It would be preferable for these sites to be identified so potential effects can be properly assessed, and consequently, measures proposed to enable such effects to be avoided or mitigated as required by the Policy. In the alternative, it may be appropriate to delete this policy given the detail covered by 14.4.3-14.4.5.	Decisions sought: • delete Policy 14.4.2; or • clarify the meaning of "Culturally significant sites" within the policy or a definition for that term be added in Section 14.1.A; and • Add an overlay to the planning maps to clearly identify the location of the various "culturally significant sites" intended to be within the scope of Policy 14.4.2.
Pg 131	Policy 14.4.3	Oppose in part	This Policy provides a reserved allocation of water for "mahinga kai values", which is a key element of the TCWP's earlier proposal to the OTOP Zone Committee. To ensure this proposal is embedded correctly in PC7, the term "Mahinga Kai Enhancement" also needs to be included as a definition, and greater consistency in wording is needed as currently there	Amend wording of the policy as follows: *c. reserving a **Mahinga Kai Enhancement** allocation of water from the Temuka FMU, accordance with Table 14 (l)……*

			seems be conflicting references to "Cultural Allocation" (rather than "Mahinga Kai Enhancement") throughout Section 14.	As noted earlier in this submission, include a definition of "Mahinga Kai Enhancement" in PC7.
Pg 131	Policy 14.4.4	Oppose in part	There are many cultural references in this plan change, and the Ngai Tahu section of the LWRP, page 17-23 provides explanation. However, the TCWP questions whether this explanation is appropriate for PC7, or whether there is a need for there to be further definitions of the sites referred to in the Policy within the LWRP. In the TCWP's view, it would be preferable for these sites to be clearly identified where possible in the planning maps so that potential effects can be properly assessed and consequently measures proposed to ensure such effects are avoided or minimised as contemplated by the Policy, to enable the plan to be implemented for consenting purposes.	Add to PC7 a definition for all culturally important sites identified within this policy, if the present explanations in section 1.3.1 of the LWRP are not applicable/sufficient and if a definition is considered to not be required. Add a new overlay in the planning maps or a series of new planning maps to clearly identify sites such as wāhi tapu, wāhi taonga and nohoanga sites.
Pg 131	Policy 14.4.5	Support	Support as the spatial extent of the cultural sites referred to are defined with supporting planning maps.	Retain Policy 14.4.5 as notified.
Pg 132	Abstraction of Water Policy 14.4.6	Oppose in part	As notified, Policy 14.4.6 infers that only consented abstractions are required to comply with environmental flow and allocation regimes in Tables 14(h) to 14(za). However, by doing so, Policy 14.4.6 fails to recognise that under PC7, it appears intended that Rule 5.111 of Canterbury Land and Water Regional Plan (**LWRP**) applies to small (non-section 14(3)(b) RMA) water takes. To be permitted by Rule 5.111, a take must comply with all conditions of Rule 5.111, which (as amended by PC7) includes reference to minimum flows if the take is not for an individual's reasonable domestic use or a person's reasonable stockwater use. For completeness, the TCWP notes that it is supportive of Community Water Supply takes in the Temuka FMU being exempt from minimum flow regimes and the reducing allocation, as per Policy 14.4.10 and LWRP Rule 5.115. Clarification is also required to ensure the Policy addresses the stream depleting component of groundwater abstractions.	Amend Policy 14.4.6 as follows: *Surface water flows are improved in the Orari-Temuka-Opihi-Pareora sub-region by ensuring all consented abstractions* ***from surface water and stream depleting groundwater with a direct or high stream depletion effect, and abstractions permitted by Rule 5.111,*** *comply with the applicable environmental flow and allocation regimes set out in Tables 14(h) to 14(za).*

Pg 132	Policy 14.4.6A	Oppose	As noted earlier in this submission, the TCWP considers it is necessary for the term "C Permit" (which relates to the "C Allocation" referred to in Policy 14.4.6A) to be defined in PC7. The proposed PC7 planning framework for "C" permits in the Temuka FMU is based on the high flow harvest block element of the TCWP's preferred regime, which was accepted by the OTOP Zone Committee and recommended (in the ZIPA) for consideration by ECan for inclusion in PC7. The TCWP notes that there was never any intention for the C allocation block to be a "swap" block, with existing surface water and/or stream depleting groundwater consents being surrendered when obtaining a new "C Permit" for high flow water (i.e. storage), as is suggested by clauses (a) and (c) of Policy 14.4.6A. Under the TCWP's earlier recommendations to the OTOP Zone Committee, this C block was intended to be for high flow/harvesting takes as part of the package of measures intended to off-set reductions in the reliability of supply for existing A and B Block abstractors whose current reliability would be significantly impacted by the increasing minimum flows and decreasing allocation. This intention is confirmed in the discussion in section 5.2.3 of ECan's technical report entitled *Overview technical report to support the Orari-Temuka-Opihi-Pareora limit-setting process* (May 2019), and elsewhere in the technical reports supporting PC7. The economic report prepared by Simon Harris describes the impact of this flow regime and is summarised in the S32 Report that the current the reduced A allocation will negatively impact the regional economic outcomes including less aggregate operating profit, GDP and employment. In the TCWP's view, this significant economic impact must be offset by the availability of C allocation. There is simply no justification to restrict access to the C allocation block in the manner proposed by Policy 14.4.6A, and amendments are required to reflect the original intention for this allocation block (i.e. as a high flow	Decisions sought: • Amend clause a) of Policy 14.4.6A as follows: *a. The consent applicant holds, or represents the interests of the holder of, a lawfully established surface water and/or stream depleting groundwater permit* ~~***will be surrendered if the application for resource consent is granted***~~*; and* • Delete clause c) of Policy 14.4.6A.

			harvest block to offset expected reductions in reliability anticipated from the implementation of the PC7 environmental flow, allocation and partial restriction regimes for A and B Permits).	
Pg 132	Policy 14.4.6B	Oppose in part	The TCWP seeks the inclusion of references to A and B water permits in the Temuka FMU in this policy, and also KIL water permits. These appear to have been over-looked. The ability to enable harvesting within these existing allocation blocks is essential to off-set expected significant reduced reliability as a result of the proposed increases in environmental flows and allocation reductions in the Temuka FMU under PC7. As outlined earlier in this submission, the TCWP seeks new definitions for A, B and C permits in the Temuka FMU are created.	Amend Policy 14.4.6B as follows: *……restrictions on AA, BA, AN, BN* ***(Opihi FMU); A, B and C Permits (Temuka FMU); and KIL Permits***
Pg 132	Policy 14.4.7 - 9	Support	The TCWP considers that: • Policy 14.4.7 as notified is superfluous; and • It is necessary and desirable for the policy framework for groundwater takes in PC7 to have greater alignment with: o Policy B6 of NPSFM (in terms of defining methods for addressing over-allocation); and o other sub-regional policy for surface water and stream depleting groundwater permit "swaps" (e.g. Policies 13.4.5 and 13.4.6). Policy 14.4.8(c) unnecessarily limits the volume authorised by any new permit granted from the proposed "T" allocation block established under PC7 based on past use of the permit that is being surrendered. It is unclear on what basis this restriction has been imposed (particularly given that the T allocation block is a new block created by PC7). The TCWP also notes that the approach is inconsistent with the approach taken to "T" allocation block takes in the Hinds catchment (LWRP, Rule 13.5.30), which requires consideration of "reasonable use" in accordance with Schedule 10 when	Retain Policy 14.4.9 as notified and amend Policies 14.4.7 and 14.4.8 as follows: *14.4.7 ~~Groundwater in the Orari-Temuka-Opihi-Pareora sub-region is managed through establishing A and T Allocation limits, the purpose of which is to: a. provide for all existing lawfully established groundwater abstractions (the A Allocation limit); and b. provide for the abstraction of groundwater in circumstances where an existing lawfully established surface water permit or stream depleting groundwater permit with a direct, high or moderate stream depletion effect will be surrendered (the T Allocation limit).~~* ***To assist with phasing out over-allocation of surface water in the Temuka FMU enable taking of low stream depleting or direct groundwater provided the applicant holds a lawfully established surface water take or direct, high or moderate stream depleting groundwater take for an equal or greater rate and volume than is sought from the low stream depleting or direct groundwater, and the surface water take or direct, high or medium stream depleting groundwater***

			setting volumes and rates of abstraction. In the TCWP's view, the approach has not been justified on either technical or planning grounds and Policy 14.4.8(c) should instead mirror the LWRP's existing approach to such takes in the Hinds catchment by focusing on demonstration of "reasonable use" in accordance with Schedule 10. It is also noted that matter of discretion (2) in the implementing rule, Rule 14.5.7, is *"Whether the amount of water to be taken and used is reasonable for the proposed use…"*. It therefore appears likely that the directive in Policy 14.4.8(c) is an error, and requires amendment to reflect the approach contemplated by Rule 14.5.7. The TCWP also considers that as notified, Policy 14.4.8(d) erroneously requires the applicant to demonstrate that the proposed take has a low stream depletion effect, and consequently would preclude ECan allocating groundwater from the "T" allocation blocks where a proposed take was from direct groundwater (i.e. has no stream depletion effect). The TCWP supports the restrictions in Policy 14.4.9(a) and (b), which it considers are appropriate for new groundwater takes from the proposed "T" allocation blocks established by PC7 (as sought to be amended by TCWP, as outlined in its submission on Table 14(zb)) and necessary to protect the reliability of existing lawfully established groundwater abstractions.	***take is surrendered.*** *14.4.8* ***In the Orari-Opihi and Levels Plain GAZ,*** ~~*Only consider granting applications for resource consent for the abstraction of*~~ ***avoid allocating*** *groundwater from the T Allocation* ~~*Limit*~~ ***Blocks*** *set out in Table 14(zb)* ~~*in circumstances where:*~~ *unless:* *a. the* ***proposed groundwater take will substitute for an existing*** ~~*consent applicant holds a*~~ *lawfully established surface water and/or* ***direct, high or moderate*** *stream depleting groundwater* ~~*permit*~~ ***take*** ~~*that will be surrendered if the application for resource consent is granted; and*~~ ~~*b. the abstraction of groundwater, in combination with all other abstractions, will not cause the T Allocation Block limits in Table 14(zb) to be exceeded; and*~~ *b*~~*e*~~*. the proposed volume* ***and abstraction rate of water to be taken and used is reasonable for the proposed use assessed in accordance with Schedule 10*** ~~*has been calculated taking into consideration records of past use for the permit that will be surrendered*~~*; and* *c*~~*d*~~*. an assessment provided as part of the application for resource consent demonstrates that the* ***proposed*** ~~*abstraction*~~ ***take*** *has a low* ***or no*** *stream depletion effect.*
Pg 133	Efficient Use of Water Policy 14.4.10	Oppose in part	The TCWP supports this policy as provision is made for community water supplies to be exempt from the requirement to comply with allocation limits and minimum flows (provided a Water Supply Strategy is in place), so as to clearly set a priority for this use. The Temuka catchment is an important resource for Timaru District Council (TDC) and supplying water for communities current and future needs. During the collaborative planning phase for PC7 prior to the release of the ZIPA and work by TCWP, there was strong	Retain Policy 14.4.10 as notified subject to the inclusion of a new definition of "community water supply" for PC7 that applies the region-wide definition to the OTOP sub-region and includes the Barkers' take authorised by CRC166228.

			support for theBarker Fruit Processors Limited (**Barkers**) community water supply take (authorised by CRC166228) to be protected by PC7 considering the relatively small scale of the current and anticipated future take, but also the significance of this for the viability of Bakers' ongoing processing operations and consequently the wider OTOP region. In the TCWP's view, the Barkers operation is of economic and social significance to the local and regional community. The TCWP notes that Barkers' take has been accepted by ECan policy planning and consenting staff as a community water supply take for the purposes of the LWRP. However, the PC7 resource consent inventory does not appear to reflect that position. The TCWP therefore seeks that PC7 be amended to ensure Barkers' take continues to be treated as a "Community Water Supply" under the LWRP. In the TCWP's view, it is fundamentally important that the Barkers water supply requirements is not restricted by minimum flows or the proposed allocation reductions for the Temuka FMU proposed by PC7, subject to a water supply strategy being held and implemented for the take. In the TCWP's view, refinements to Policy 14.4.10 and also 14.4.30 (discussed below) are needed to ensure this outcome is achieved.	
Pg 133	Policy 14.4.11	Support	This policy has the effect of requiring those with water supplies from schemes to use scheme water as the primary source of water and prioritise that water supply over water from other water sources within the catchment. This has been included in other sub-catchment plans and is supported by the TCWP.	Support Policy 14.4.11 as notified.
Pg 133	Policy 14.4.12	Support	Given the over-allocation with the Temuka FMU there must be strong mechanisms to reduce allocation, including by restricting replacement consents to past use, which the TCWP considers is appropriate as per Method 1 of Schedule 10. In addition, it is recommended that PC7 includes a further policy supporting replacement of consents, by way of a new policy.	Retain Policy 14.4.12 as notified. Include an additional policy in PC7 as follows: ***In considering whether to grant or refuse applications for replacement of existing consents, the consent authority will:*** ***a) consider whether all reasonable attempts***

				to meet the efficiency expectations of this Section have been undertaken; ***b) recognise the value of the investment of the existing consent holder; and*** ***c) maintain the inclusion of the consent, if granted, in any allocation limits and priority bands on the water body concerned.***
Pg 134	Transfer of Water Permits Policy 14.4.13	Oppose in part	The TCWP made a decision that to reduce over-allocation in this catchment, a strong position needed to be taken to ensure transfers of water permits cannot occur in the Temuka FMU, so as to limit the potential for increased usage of water. Therefore, this policy is supported for this over-allocated catchment. However, the TCWP considers that additional provision should be made to enable transfers to occur if allocation reduces below the stated allocation limits in the future. Such an approach would align with other sub-regional plan provisions in the LWRP. The TCWP considers it is essential to have as many mechanisms as possible in the Temuka catchment to deal with over allocation. As a result, the TCWP is seeking the ability to have global consents for tributaries within the Temuka catchment to manage consents. This is detailed later in Policy 14.4.31, but an amendment to Policy 14.4.13 is proposed for completeness.	Policy 14.4.13 be amended as follows: c) …..***until such time as the allocation limits within Table 14 (i) to (l) are achieved or the transfer is to an Irrigation Scheme as part of a global consenting process for existing lawfully established takes in the Temuka FMU.***
Pg 134	Out of Catchment Water Policy 14.4.14	Oppose in part	It is critical that the source of alternative water supplies are identified for the over-allocated Temuka catchment and enabled within this plan framework, which may be from catchments within the OTOP zone or from other catchments outside of the OTOP zone. This plan must enable the development of community solutions for alternative secure and reliable water supplies to achieve the reductions in allocation, reduction in reliability of supply and environmental improvements proposed by TCWP by 2040. This is essential if the Canterbury Water Management Strategy target of 95% reliability is achieved as the current flow regime is decreasing significantly.	Amend Policy 14.4.14 as follows: *14.4.14 When introducing water from outside the ~~catchment~~**Orari-Temuka-Opihi-Pareora sub-region**, protect the values, customs and culture of papatipu rūnanga by: ….*

			Consultation to protect cultural values, customs and culture of runanga is also critical and must be considered. 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 it the intent of the Policy) or, for example, movement of water between the tributary catchments of larger catchments in the OTOP sub-zone. TCWP considers Policy 14.4.14 requires amendment to ensure there is greater certainty around the intended scope and application of the Policy.	
Pg 137	Consent Reviews Policy 14.4.21	Oppose in part	Given the Temuka FMU is an 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 any consent review will need to be done in an effective and appropriate manner, rather than an immediate reaction. The first reduction is not required until 1 January 2025, and therefore it is recommended that this timeframe is more appropriate.	Delete the following words from Policy 14.4.21: ***~~immediately after plan change 7 is made operative~~*** and replace with***, prior to 1 January 2025.***
Pg 139	Over-allocation Policy 14.4.30	Oppose in part	<u>Target date for phasing out over-allocation:</u> The requirement that the phasing out of overallocation in the Temuka FMU be achieved by 2035 rather than 2040 (as was originally recommended to the OTOP Zone Committee by the TCWP) is strongly opposed. The TCWP has spent considerable time and effort in developing a solutions package for the Temuka FMU through the ZIPA process. Over-allocation is a significant matter to be addressed and the TCWP has courageously tackled it through its work prior to the final ZIPA being released in December 2018. However, the critical element of the regime is appropriate time to adapt given the significant impact on reliability of supply and therefore the economic impacts for the farm businesses within the Temuka FMU. For these reasons, the TCWP maintains the view that the target date for phasing out	Decision sought: Amend Policy 14.4.30 as follows: *Over allocation of the Temuka FMU is phased out before 1 January ~~2035~~* ***2040*** *by:* *d) achieving allocation limits of 1.6m3/s for A allocation Block and 0.4m3/s for the B Allocation Block by 1 January ~~2035~~* ***2040*** Add another two conditions to Policy 14.4.30 as follows: ***e. enabling the voluntary reduction in allocation to all existing water permits; and*** ***f. Barkers Food Processing Limited demonstrating on or before 2026, increased efficiency for any***

			over allocation in the Temuka FMU must be 2040 (not 2035 as proposed by PC7). The economic report prepared by Simon Harris describes the impact of this Temuka FMU flow regime and is summarised in the Section 32 Report that the reduced A allocation will negatively impact the regional economic outcomes including less aggregate operating profit, GDP and employment. The B allocation with the increase in minimum flow and decrease in allocation will decrease reliability of supply and negatively impact regional outcomes. The conclusion is economic impact in the Temuka FMU is substantial and may cause significant impact for irrigators. Irrigators within the Temuka catchment have strongly advised that this WILL cause significant impact to irrigators and as a result there must time to change and seek community wide solutions for the catchment, such as out of catchment water, transferring to deep groundwater, storage and the support of C permit allocation. Section 14 of the LWRP, made operative several years ago, has targets of 2040 for the Orari catchment which is also a substantial over-allocated catchment so the date for the Temuka FMU is considered appropriate. <u>Additional mechanisms to address over-allocation</u> The TCWP considers it is essential to have as many mechanisms as possible available in the Temuka catchment to address over allocation. As a result, the TCWP is seeking that three further mechanisms be built into the PC7, as addressed below. The first mechanism is to incentivise the voluntary reduction of consented allocation by way of a controlled activity consenting pathway. The second mechanism is a further consenting pathway to enable the global management of consented allocation in each of the tributaries within the Temuka FMU.	***replacement of CRC166228, or any variation thereof, and security of supply for community fire-fighting and drinking water, stock water and industrial processing water is protected by reserving a total flow rate of 20 L/s in addition to the allocations in Tables 14(i) to (k).*** Include a new policy for global consenting of water takes in the Temuka FMU (or amendment to Policy 14.4.11 and Rule 14.5.31 for Opihi FMU) as follows or similar to achieve the outcome sought in the TCWP's submission: ***New Policy – Contribute to the overall management of surface flows within the Orari, Temuka and Pareora Freshwater Management Unit, by providing for the transfer of surface water permits to an Irrigation Scheme where this will result in a water permit authorising the abstraction of all transferred water.***

			This concept is already within PC7 for the Opihi FMU only (Policy 14.4.40 and Rule 14.5.31). The Temuka Catchment Group has already been formed by water users within the Temuka FMU, and may be an appropriate body to hold global consents in the future. A policy and rule has been proposed by the TCWP to be included within the wider planning framework for the OTOP sub-region for this purpose. The third mechanism relates to the Barkers' community water supply take, which is discussed in the TCWP's submission on Policy 14.4.10 above. The TCWP considers it would be appropriate to include in Policy 14.4.30 a requirement that water use efficiencies in that supply be investigated before the expiry of the consent in 2026 and that allocation to cover the current and expected water needs of Barkers (20 L/s) be reserved, similar to the approach adopted in Policy 14.4.22 for the Timaru District Council's community water supply take in the Orari catchment.	
Pg 139	Policy 14.4.31	Oppose in part	The TCWP supports the surface water resources of the Temuka catchment being managed to achieve the proposed allocation limits, but by 2040 and not 2035 as discussed in the previous submission on Policy 14.4.30.	Amend Policy 14.4.31 to replace the timeframe of 1 January ~~2035~~ with ***2040***
Pg 139	Transfer of Water Permits Policy 14.4.32	Oppose in part	The TCWP supports the principal transfer concept proposed by this Policy but considers amendments are needed to reflect the allocation limits determined in the applicable table and alignment with Policy 14.4.13, which is actually far stronger for the Temuka catchment whereby no granting of consents is proposed.	Replace Policy 14.4.32 with: ***To assist in the phasing out of over-allocation of surface water or groundwater that has a direct, high or moderate stream depletion effect, by not granting any application to transfer water from until such time as the allocation limits within Table 14 (i) to (l) are achieved.***
Pg 140	Cultural Allocation Policy 14.4.33	Oppose in part	The TCWP supports the intention of this Policy (which imbeds a key element of the TCWP's earlier recommendations to the OTOP Zone Committee in PC7). However, clarification is	Amend Policy 14.4.33 as follows: *Recognise and provide for the cultural importance of*

			required with respect to the reference to "Cultural allocation". As explained earlier in this submission, the TCWP seeks greater consistency in the terminology used in PC7 and considers it necessary for the Policy to instead refer to "Mahinga Kai Enhancement Allocation".	*the TCMU to Ngai Tahu by reserving **the Mahinga Kai Enhancement Allocation** of surface water from the Temuka River for the enhancement of mahinga kai and associated tangata whenua values.*
RULES				
Pg 143	Take and Use of Surface Water Rule 14.5.1	Support	The TCWP supports the provision for cultural allocation of water for Mahinga Kai Enhancement within the Temuka FMU.	Support Rule 14.5.1 as notified.
Pg 143	Rule 14.5.2	Support	The TCWP supports the Rule's requirement that Mahinga Kai Enhancement allocation can only be accessed by a consenting process in accordance with the PC7 allocation limits.	Retain Rule 14.5.2 as notified.
Pg 144	Rule 14.5.3	Support	The TCWP supports the Rule's requirement that Mahinga Kai Enhancement allocation can only be accessed by a consenting process, in accordance with the PC7 allocation limits.	Retain Rule 14.5.3 as notified.
	New Rules Proposed	New Rules Proposed	The TCWP considers it is essential to have as many mechanisms as possible in the Temuka catchment to deal with over allocation. In order to provide an incentive to reduce existing water permit allocation, it is recommended there is a simple and cost-effective consenting pathway with clear stipulation on what can be assessed, and certainty of a reduced consent being granted. This rule would give effect to Policy 14.4.30. Therefore a controlled activity is sought to enable this approach for the Orari, Temuka and Pareora Freshwater Management Unit. As discussed above in its submission on Policy 14.4.30, the TCWP also seeks the inclusion of a discretionary activity rule for global consenting of water permits in the Temuka FMU.	Include the following new proposed controlled activity rule in pC&: ***The take and use of surface water for the purpose of reducing the rate and/or volume of surface water or stream depleting groundwater authorised by an existing water permit's is a controlled activity*** ***The CRC reserves control over the following matters:*** ***a. The rate and volume of the take; and*** ***b. Whether the annual volume to be taken and used is reasonable for the proposed use calculated in accordance with Schedule 10.*** Include the following new discretionary activity rule in PC7: ***New Rule – Within the Temuka Freshwater Management Unit the transfer to an Irrigation Scheme water permits to take and use surface water is a discretionary activity provided the following conditions are met:***

				1) the application for resource consent is for the transfer of existing authorised water permits in the Temuka Freshwater Management Unit; and ***2) there is no net increase by sub-catchment in the total instantaneous rate of take beyond what is authorised to be abstracted under transferred water permits; and*** ***3) The water permit being issued will not result in an exceedance of the applicable environmental flow and allocation regimes in Tables 14(i) to (l) of this plan; and*** ***4) All existing authorised water permits held by the transferees are surrendered as part of an application for resource consent lodged under this rule.***
Pg 144	Rule 14.5.4	Oppose in part	This rule is supported for the take and use of surface water as a restricted activity. However, matters of discretion in relation to effects on water quality are more appropriately addressed through farming land use consents.	Delete matter of discretion (2) in Rule 14.5.4.
Pg 145	Rule 14.5.5	Support	It is expected that renewals must be able to be granted but through scrutiny to ensure no more water can be used than previously and that all polices of this plan change are given effect to considering the extent of over-allocation in the Temuka FMU. It is expected this rule achieves this outcome.	Retain Rule 14.5.5. as notified.
Pg 145	Rule 14.5.6	Support	The TCWP supports the position adopted by Rule 14.5.6 by prohibited the grant of water permits for abstraction which would have the effect of exceeding the allocation limits set by PC7, especially in an over-allocated catchment.	Retain Rule 14.5.6 as notified.
Pg 145	Take and use of Groundwater	Oppose in Part	The wording of proposed Rules 14.5.7 and 14.5.8 is inconsistent with other rules in the LWRP that regulate similar groundwater permit "swaps" (e.g. Rule 13.5.30). In the	Amend Rules 14.5.7 – 14.5.8 as follows: *Notes:*

	Rule 14.5.7 - 8		TCWP's view, greater alignment with the wording of other rules in the LWRP would be preferable. Proposed condition (2) of proposed Rule 14.5.7 is confusing. The inclusion of the word "proposed" would provide greater clarity of the intended application of the condition. Proposed condition (5) of proposed Rule 14.5.7 would only enable permit "swaps" in the Temuka catchment. Specifically, it would preclude "swaps" of those permits that have, as a result of the implementation PC7, changed status from direct groundwater to stream-depleting groundwater permits. This is inconsistent with the intended scope of the Rule (as described in the Section 32 Report), and technical reports/memos supporting PC7. It is therefore the TCWP's view that condition (5) of Rule 14.5.7 should be deleted so as to provide the holders of these permits an alternative option of securing a reliable water supply via deeper groundwater.	*1. Rules 14.5.7 to 14.5.8 apply to groundwater takes that will replace an existing surface water take or groundwater take with a direct, high or moderate stream depletion effect* *2. Rules 14.5.9 to 14.5.11 prevail over Regional Rules 5.128 to 5.130 except in the Pareora Freshwater Management Unit.* *14.5.7 The taking and use of groundwater that will ~~replace~~ **substitute** an existing surface water or groundwater permit that has a direct, high or moderate stream depletion effect is a restricted discretionary activity, providing the following conditions are met:* *1. The proposed take, in addition to all existing consented takes will not result in an exceedance of the relevant groundwater T allocation limit in Table 14(zb); and* *2. The **proposed** take will not have a direct, high or moderate stream depletion effect; and* *3. The point of abstraction will be within the same property as the existing water permit and there is no increase in the proposed rate of take or annual volume; and* *4. The bore interference effects are demonstrated to be acceptable determined in accordance with Schedule 12; and* *~~5. The existing surface water or groundwater permit being replaced is for a take from an over-allocated surface water catchment FMU ; and~~* *5~~6~~. The existing surface water or groundwater permit is surrendered.* *The exercise of discretion is restricted to the following matters:* *1. The rate, volume and timing of the take; and* *2. Whether the amount of water to be taken and used is reasonable for the proposed use. In assessing reasonable use for irrigation purposes, the CRC will*

				consider the matters set out in Schedule 10; and *3. The maximum rate of take, including the capacity of the bore or bore field to achieve that rate, and the rate required to service any irrigation system; and* *4. Whether salt-water intrusion into the aquifer or landward movement of the salt water/fresh water interface is prevented; and* *5. The proximity and actual or potential adverse environmental effects of water use to any significant indigenous biodiversity and adjacent dryland habitats; and* *6. The protection of groundwater sources, including the prevention of backflow of water or contaminants; and* *7. Where the water is being used for irrigation, the preparation and implementation of a Farm Environment Plan in accordance with Schedule 7 that demonstrates that the water is being used efficiently.; and* *8. Any adverse effects of the use of water on Ngāi Tahu values, or on sites of Ngāi Tahu significance, including wāhi tapu and wāhi taonga.* *14.5.8 The taking and use of groundwater that will ~~replace~~ **substitute** an existing surface water or groundwater permit that has a direct, high or moderate stream depletion effect that does not comply with one or more of the conditions of Rule 14.5.7 is a prohibited activity.*
Pg 146	14.5.9 - 10		Matter of discretion (7) in Rule 14.5.9 directs consideration of the matters of discretion under Rule 14.5.7 where the application is for a stream depleting groundwater take. However, there appears to be no additional matters of discretion under Rule 14.5.7 (i.e. the matters of discretion for groundwater takes are consistent across Rules 14.5.7 and 14.5.9). It therefore appears that this matter has been included in error, and accordingly, should be deleted.	Amend Rules 14.5.9 – 14.5.10 as follows: ***14.5.9 The taking and use of groundwater is a restricted discretionary activity, provided the following conditions are met:*** *1. For stream depleting groundwater takes with a direct or high stream depletion effect, the take, in addition to all existing consented takes does not result*

				in an exceedance of any minimum flow in Tables 14(h) to (za); and *2. The take:* *a. will replace a lawfully established take affected by the provisions of Section 124-124C of the RMA, and the rate, seasonal or annual volume of the take, in addition to all existing consented takes, does not exceed the allocation limits in Tables 14(h) to 14(zb);or* *b. will not replace a lawfully established take affected by the provisions of Section 124-124C of the RMA, and the rate, seasonal or annual volume of the take, in addition to all existing consented takes, does not exceed the allocation limits in Tables 14(h) to 14(zb); and* *3. Unless the proposed take is the replacement of a lawfully established take affected by the provisions of sections 124-124C of the RMA, the bore interference effects on any groundwater abstraction other than an abstraction by or on behalf of the applicant are acceptable, as determined in accordance with Schedule 12.* ***The exercise of discretion is restricted to the following matters:*** *1. The rate, volume and timing of the take; and* *2. Whether the amount of water to be taken and used is reasonable for the proposed use. In assessing reasonable use for irrigation purposes, the CRC will consider the matters set out in Schedule 10; and* *3. The availability and practicality of using alternative supplies of water; and* *4. The maximum rate of take, including the capacity of the bore or bore field to achieve that rate, and the rate required to service any irrigation system; and* *5. The actual or potential adverse environmental effects on surface water resources; and* *6. Unless the proposed take is the replacement of a*

				lawfully established take affected by the provisions of sections 124-124C of the RMA, the actual or potential adverse environmental effects the take has on any other authorised takes, including bore interference effects as set out in Schedule 12; and *~~7. For stream depleting groundwater takes, the matters of discretion under Rule 14.5.7; and~~* *8. Whether salt-water intrusion into the aquifer or landward movement of the salt water/fresh water interface is prevented; and* *9. The proximity and actual or potential adverse environmental effects of water use to any significant indigenous biodiversity and adjacent dryland habitats; and* *10. The protection of groundwater sources, including the prevention of backflow of water or contaminants; and* *11. The reduction in the rate of take and volume limits to enable a reduction in over-allocation; and* *12. Where the water is being used for irrigation, the preparation and implementation of a Farm Environment Plan in accordance with Schedule 7 that demonstrates that the water is being used efficiently; and* *13. Any adverse effects of the use of water on Ngāi Tahu values, or on sites of significance to Ngāi Tahu, including wāhi tapu and wāhi taonga* ***14.5.10 The taking and using of groundwater that does not comply with one or more of conditions 2a or 3 of Rule 14.5.9 is a non-complying activity.*** ***14.5.11 The taking and using of groundwater that does not comply with one or more of conditions 1 or 2b of Rule 14.5.9 is a prohibited activity.***
Pg147	Rule 14.5.12	Oppose in part	The TCWP supports for the proposed preclusion of transfers in the Temuka catchment under this rule. However, for the reasons outlined earlier in this submission, the TCWP considers	Amend Rules 14.5.12 – 4 to prohibit transfers in the Temuka FMU until such time as the allocation limits within Table 14 (i) to (l) are achieved and unless the

			that transfers should be enabled in the future if/when the allocation is reduced below the PC7 allocation limits or in the case of transfers for the purpose of a global consenting. Amendments are required to address this issue.	transfer is to an Irrigation Scheme as part of a global consenting process for existing lawfully established takes in the Temuka FMU.
Pg 148	Rule 14.5.13	Support	The TCWP supports Rule 14.5.13 to ensure transfers do not occur in Temuka catchment.	Subject to the TCWP's submission above in relation to Rule 14.5.12, retain Rule 14.5.13 as notified
Pg 165	Table 14 i)	Oppose in part	The Mahinga Kai Enhancement Allocation is supported as a concept and this was developed by the TCWP group through the ZIPA phase. However, to give effect to this concept, the reference to "Cultural Allocation" needs to be amended to reflect wording within the rest of the plan and as proposed by this submission. The TCWP notes that the regime imbedded in this table was developed by the TCWP, and was believed to strike an appropriate balance between on the one hand seeking improved environmental outcomes for the catchment, and on the other managing the effects of reduced water reliability on financial viability and profitability of the farm businesses within the Temuka FMU. In the TCWP's view, allowance of reasonable time to adapt to the changes in environmental flow and allocation regimes proposed is crucial for businesses, and PC7 must enable the ability for alternative sources of water supply to be secured prior to such changes taking effect. It remains the TCWP's view that the regime set out in Table 14 i) achieves these outcomes.	Retain Table 14(i) in its notified form, subject to replacing the term "Cultural Allocation" with "**Mahinga Kai Enhancement Allocation**"
Pg 165	Table 14 j)	Support	The TCWP notes that the regime imbedded in this table was developed by the TCWP, and was believed to strike and appropriate balance between on the one hand seeking improved environmental outcomes for the catchment, and on the other managing the effects of reduced water reliability on financial viability and profitability of the farm businesses within the Temuka FMU. In the TCWP's view, allowance of reasonable time to adapt to the changes in environmental flow and allocation regimes proposed is crucial for businesses, and PC7	Retain Table 14 j) as notified

			must enable the ability for alternative sources of water supply to be secured prior to such changes taking effect. It remains the TCWP's view that the regime set out in Table 14 j) achieves these outcomes.	
Pg 165	Table 14 k)	Support	The TCWP notes that the regime imbedded in this table was developed by the TCWP, and was believed to strike and appropriate balance between on the one hand seeking improved environmental outcomes for the catchment, and on the other managing the effects of reduced water reliability on financial viability and profitability of the farm businesses within the Temuka FMU. In the TCWP's view, allowance of reasonable time to adapt to the changes in environmental flow and allocation regimes proposed is crucial for businesses, and PC7 must enable the ability for alternative sources of water supply to be secured prior to such changes taking effect. It remains the TCWP's view that the regime set out in Table 14 j) achieves these outcomes. As discussed earlier in this submission, the concept of the C allocation block was to off-set the impact on existing A and B water permits of increasing minimum flows and reductions in consented allocation under PC7, by enabling high flow water to be sought to improve reliability of supply and potentially allow for a collaborative community solution.	Retain Table 14 k) as notified.
Pg 166	Table 14 l)	Oppose in part	The TCWP supports the proposed environmental flow, allocation and partial restriction regime proposed in this Table on the basis that such changes are necessary to achieve improved environmental outcomes and the OTOP Zone Committee's aspirations for the OTOP sub-region. However, it considers that the requirement that the regime to take effect at 1 January 2035 is too soon, and more time (to 2040) is required to provide affected consent holders time to adjust and/or alternative water supplies to be secured. The economic consequences for the farm businesses in the Temuka	Replace "Cultural Allocation" with ***Mahinga Kai Enhancement Allocation*** and amend the date on which the Table 14 l) regime is to take effect ~~from 1 January 2035~~ to 1 January ***2040.***

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<td>FMU are so severe (as recognized by the S32 Simon Harris report) that further time is justified.

Consequential amendments are also required to address the TCWP's submissions regarding consistency of terminology.</td>
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<td>Pg 132</td>
<td>Table 14 (zb)</td>
<td>Oppose</td>
<td>This policy incorrectly caps existing groundwater at current allocation and only a T allocation block for future groundwater if transferring from surface water.

The advice received from the TCWP's consultants during the collaborative planning process for PC7, which informed its recommendations to the OTOP Zone Committee in relation to potential mechanisms for phasing out over allocation in the Temuka catchment, was that approximately 10 million cubic metres per year was needed in the T allocation block for the Orari-Opihi Groundwater Allocation Zone to enable permit "swaps".

As notified, the T allocation block is the difference between the limit for the zone in the LWRP of 71.1 million cubic metres per year and what is considered to be the current allocation for the zone of 43.3 million cubic metres per year. However, the purported "current" allocation is considerably out of date and is known to not take account of all consented takes up to the notification of PC7, but rather an estimate from the consents database in July 2017. As the zone was "yellow", further consents have been granted since this time, as well as a large number of renewals.

The TCWP accepts where zones are over-allocated, it is appropriate to cap allocation at current consented abstraction. Where zones are not, however, the TCWP considers it is appropriate to retain the ability for further groundwater abstractions to be consented from them. The approach taken in Table 14(zb) is to preclude the granting of consents to take groundwater from groundwater allocation zones that are known to have capacity for further abstraction as at PC7 notification.</td>
<td>Amend Table 14(zb) as follows:

<table>
<tr><th>Zone</th><th>A allocation limit</th><th>T allocation limit</th></tr>
<tr><td>Rangitata-Orton</td><td>Sum of consented allocation at 20 July 2019</td><td>0</td></tr>
<tr><td>Fairlie</td><td>Sum of consented allocation at 20 July 2019</td><td>0</td></tr>
<tr><td>Levels Plains</td><td>32.9</td><td>0</td></tr>
<tr><td>Orari-Opihi</td><td>61.1</td><td>10</td></tr>
<tr><td>Pareora</td><td>Sum of consented allocation at 20 July 2019</td><td>0</td></tr>
<tr><td>Timaru</td><td>4.24</td><td>0</td></tr>
<tr><td>Upper Pareora</td><td>Sum of consented allocation at 20 July 2019</td><td>0</td></tr>
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