

IN THE MATTER of the Resource Management Act 1991 and a Notice of Requirement to Selwyn District Council and Applications to Canterbury Regional Council for resource consents

BY Central Plains Water Trust

AND Central Plains Water Ltd

**FURTHER SUBMISSIONS OF COUNSEL FOR
THE CHRISTCHURCH CITY COUNCIL**

DATED 13 October 2009

Introduction

1. The written submissions for the City Council raised the following concerns:
 - 1.1. The potential for an increased risk of nitrate contamination of groundwater impacting on the City's drinking water supply;
 - 1.2. The potential for a significantly increased risk of groundwater contaminants;
 - 1.3. The potential for raised natural groundwater levels in Christchurch and elsewhere on the plains;
 - 1.4. The effects of the proposal on the Christchurch aquifer recharge;
 - 1.5. The potential for the CCC to become the "environmental underwriters" of the proposal;
 - 1.6. The lack of quantifiable economic benefits and costs to the Scheme;
 - 1.7. The potential biosecurity effects;

- 1.8. The lack of specified community recreational benefits;
 - 1.9. The effects of encountering contaminated sites during construction; and
 - 1.10. The use of hazardous substances and generation of solid waste during the construction process.
2. Its evidence at the initial hearing of the notified proposal focussed on:
- 2.1. The effects of the proposed scheme on the Waimakariri River flows and the Christchurch aquifer recharge;
 - 2.2. The effects on land drainage and raised groundwater levels (particularly the latter as a potential constraint on mineral extraction activities); and
 - 2.3. The effects on groundwater quality due to increased land drainage beneath the irrigation area.
3. The City maintains the concerns raised in its written submissions and initial evidence. These concerns relate to the entire City area which includes urban Christchurch, the rural area to the west and south, and Lake Ellesmere, part of which occurs within the CCC boundary following its amalgamation with the former Banks Peninsula District. Essentially its position remains that it considers a cautious approach should be taken to the assessment of environmental effects. If potential adverse effects cannot be adequately addressed then consent should be declined. It is not supportive of an adaptive management approach in this case, and prefers that conditions of consent are as stringent as possible. This reflects the uncertainties in predicting groundwater effects and the time delay before adverse effects may become evident through monitoring.

Amended proposal

4. Mr Callander has reviewed the amended proposal, CPW evidence and the latest officer reports.

5. The Panel will be aware from his pre-circulated evidence that his main conclusions are that:
 - 5.1. Overall, the effects of the revised proposal on groundwater and drinking water supply are less than the notified proposal;
 - 5.2. It leaves more water in the Waimakariri River and reduces the amount of water to be taken;
 - 5.3. The Waimakariri River recharge to the City aquifers is protected;
 - 5.4. Effects on raised groundwater levels are reduced but may still be a problem in some areas;
 - 5.5. Effects on nutrients in groundwater remain uncertain but are not expected to adversely effect the deep groundwater wells of the City's urban water supply; and
 - 5.6. Stringent conditions are required to address issues arising from raised water levels, nitrate effects on shallow wells and scheme-wide nutrient management in spring fed wells.

6. A proposed schedule of amended conditions are attached. This updates the schedule presented with the City's initial evidence. Points to note include:
 - 6.1. conditions confirming the peak abstraction rate of 25 cumecs with 1:1 sharing above the flow at which existing consent holders are subject to restrictions – i.e. a measured Waimakariri River flow of 64.24 cumecs at the Old Highway Bridge.
 - 6.2. A requirement to take water from the Rakaia River to meet the scheme's water needs before the Waimakariri River is utilised.
 - 6.3. Expanding the scope of an independent peer review panel for the scheme to include an assessment of any changes to aquifer recharge from the Waimakariri River.

- 6.4. Other points raised in our original submission related to a stronger requirement for CPW to implement effective mitigation measures for the adverse effects that are associated with their activities may create.

A J Prebble

13 October 2009