

UNDER The Resource Management Act 1991

IN THE MATTER OF Resource consent applications by
Central Plains Water Trust

AND

IN THE MATTER OF Submissions by **Te Rūnanga o Ngāi
Tahu**

**Supplementary Submissions by Environmental Advisor for Te Rūnanga o Ngāi
Tahu**

1. My name is Paul David Horgan and I appear on behalf of Te Rūnanga o Ngāi Tahu. I have qualifications in both law and resource management and have had several years experience in environmental law, policy analysis and planning related matters. I have been employed by Te Rūnanga o Ngāi Tahu as an Environmental Advisor for the past 3 and a half years.
2. These submissions briefly describe the implications for Te Rūnanga o Ngāi Tahu of the revised Central Plains Water Enhancement Scheme (as described in the evidence of Cliff Tipler).
3. From a positive perspective, the indication by the commissioners (contained in minute 10) that consents for the Waianiwaniwa dam/reservoir and the upper Waimakariri intake are likely to be declined will alleviate the Ngāi Tahu concerns relating to the impact upon sites of cultural significance. In particular, the removal of the upper Waimakariri intake will ensure that there is no impact upon the historic pā site and urupā at the confluence of the Kowhai and Waimakairiri Rivers.
4. Having said this, Te Rūnanga o Ngāi Tahu still insists that, in the event consent is granted for the revised run of river scheme, a detailed archaeological assessment be undertaken, especially of the areas in and around the proposed route of the head races and irrigation canals.

5. Beyond this, most of the concerns about the CPW scheme outlined by Te Rūnanga o Ngāi Tahu in its original evidence remain unchanged. Te Rūnanga o Ngāi Tahu is concerned that, instead of alleviating the pressure currently placed upon the groundwater resource (which was one of the asserted benefits of the scheme that CPW placed considerable weight upon), the revised scheme could in fact lead to greater pressure being placed upon it. Rather than placing less reliance upon groundwater abstractions, it is likely that, in order to obtain an economically viable level of reliability, the same or even greater reliance will come to bear upon the already over allocated aquifers within the Rakaia-Selwyn and Selwyn-Waimakariri groundwater zones.
6. Te Rūnanga o Ngāi Tahu also considers that the revised scheme will still result in an unacceptable discharge of nitrates and phosphorous to groundwater, the lowland streams and Te Waihora. Te Rūnanga o Ngāi Tahu maintains that, should CPW proceed – with or without the Waianiwaniwa reservoir, our intentions to restore and rehabilitate Te Waihora will become unattainable.
7. Te Rūnanga o Ngāi Tahu will call evidence today from Paul White about the implications for the groundwater resource of the revised scheme. Paul White will respond to the evidence of Cliff Tipler. In addition, Paul White has also prepared a separate statement of evidence that responds to and comments upon the Norton/Bidwell report on nutrient and other contamination issues.
8. Te Rūnanga o Ngāi Tahu has also filed a supplementary statement of evidence from Professor David Hamilton in response to the supplementary evidence of Dr Greg Burrell. I would also like to circulate today a brief response from Professor Hamilton to the Norton/Bidwell report. Unfortunately, Professor Hamilton is overseas this week and is unable to attend the hearing. He has, however, made the offer that he would be available to answer any queries arising out of his evidence via email.
9. Finally, Te Rūnanga o Ngāi Tahu wishes to emphasise that its concerns about the potential mixing of waters as a result of emergency discharges remain unresolved by the revised scheme.