



Otago
Regional
Council

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Freepost 1201
Variation 4 Proposed Natural Resources Regional Plan
Environment Canterbury
58 Kilmore Street
PO Box 345
Christchurch

Dear Sir / Madam

Re: Variation 4 to the Proposed Canterbury Natural Resource Regional Plan (NRRP), Chapter 5: Water Quantity (Your Ref: NRRP/2002/V4/GEN/1C)

Thank you for consulting with this Council on Variation 4.

Your letter dated 21 June 2007 states that because the proposed changes affect Schedule WQN4 and other parts of Chapter 5, any submissions that have already been made on Schedule WQN4 or the other amended parts of Chapter 5 in Variation 1 NRRP will, under RMA Schedule 1 16B, be deemed to be a submission to this Variation also.

Therefore Council is of the understanding that as a submitter to Variation 1, as attached, Council will also be considered a submitter to Variation 4.

If you require clarification or would like to discuss this further do not hesitate to contact me on (03) 474 0827 or sarah.valk@orc.govt.nz

Yours sincerely

Sarah Valk
Resource Planner – Liaison

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(originally sent Dec 04)

Otago Regional Council Submission on Environment Canterbury Proposed Natural Resources Regional Plan

Introduction

As Otago is a neighboring region to Canterbury, the Otago Regional Council (ORC) is potentially affected by provisions in the Proposed Natural Resources Regional Plan (NRRP).

The ORC believes that amendments are required to the NRRP to avoid cross boundary effects.

1. Submission Points

This submission by the ORC has submission points that relate to Chapter 5: Water Quantity.

2.1 Management of Waitaki River Flows

The existing flow regime in the Waitaki River directly affects the presence of springs and wetlands located adjacent to the true right (south) bank of the River. Attention is drawn specifically to the Lower Welcome Creek, which is directly affected by changes in the flow of the Waitaki River.

Further, the existing flow regime also allows for dilution of the impacts from current land use practices in the greater catchment, particularly nutrient runoff. The flow regime has also shaped the riparian management work undertaken by landowners and the ORC adjacent to the main stem and tributaries of the Waitaki River.

Decision Requested:

The ORC seeks:

- *Recognition in the NRRP of the connection between the Waitaki River flows and Otago spring fed water bodies and wetlands.*
- *Provision(s) in the NRRP for a flow regime for the Waitaki River which preserves wetlands and springs on the true right bank of the Waitaki River.*
- *Determination of any flow regimes should also consider assimilation capacity to mitigate nutrient runoff from both true left and true right banks.*

2.2 Waitaki River Surface Water Takes

In establishing a water allocation regime for the Waitaki River, the ORC believes that ECan, in developing objectives, policies and rules in the NRRP, should recognise and provide for the implications of water use on land. It is noted that the Lower Waitaki

Irrigation Scheme at Black Point is a surface water take that is authorised by ECan, but the water is used on land within Otago.

Adverse effects of applying water to land include nitrate and pesticide leeching. Another consideration is the impact of irrigation bywash from large-scale irrigation operations into streams and the coastal marine area.

Decision Requested:

The ORC seeks that in establishing a water allocation regime for the Waitaki River, through objectives, policies and rules in the NRRP, there needs to be explicit recognition of the implications of irrigation drainage and ground water effects of drainage.

2.3 Allocation from the Papakaio Formation - Maerewhenua Basin Aquifer

The Papakaio Formation - Maerewhenua Basin Aquifer is located across the boundary between Otago and Canterbury, and is currently fully allocated. The ORC seeks that the existing allocation level and demand on the aquifer be explicitly recognised in the policies, objectives and rules in the NRRP.

A specific area of concern to the ORC, is the recharge outcrop zone for the Papakaio Aquifer. This area is of significance as it is a specific zone through which water percolates into the aquifer. ORC considers it would be inappropriate to allow certain landuses in the area that have the potential to limit recharge to, and/or contaminate the Papakaio Aquifer.

Research has identified a hydraulic connection between the Maerewhenua River and the Papakaio Aquifer, whereby natural flow losses and recharge are exchanged. This connection should also be recognised in the surface water allocation regime established for this catchment.

Decision Requested:

The ORC seeks that

- *The existing ORC and ECan allocation levels and demand on Papakaio Aquifer be explicitly recognised in the policies, objectives and rules in the NRRP.*
- *The NRRP should control or prohibit landuses in the area that have the potential to limit recharge to, and/or contaminate the Papakaio Aquifer, or as a minimum introduce or review policies that District Plans will be consistent with.*

2. Conclusion

To effectively manage the natural resources in both the Otago and Canterbury regions, the ORC believes that all cross boundary effects need to be addressed. The ORC requests that modifications to the NRRP detailed in this submission are considered.

Signed

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Selva Selvarajah
Director Resource Management

The Council's address for service is:

Manager Resource Planning
Otago Regional Council
Private Bag 1954
Dunedin
Telephone 03 474 0827
Facsimile 03 479 0015

The Council wishes to be heard in support of this submission.