

11. VARIATION 4 TO THE PROPOSED NATURAL RESOURCES REGIONAL PLAN



General Manager responsible:	General Manager Strategy and Planning, DDI 941-8177
Officer responsible:	Programme Manager- Healthy Environment
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PURPOSE OF REPORT

1. The purpose of this report is to seek retrospective adoption by the Council of the attached submission on Variation 4 to the Proposed Natural Resources Regional Plan (PNRRP). The submission was lodged with Environment Canterbury prior to the closing date of 3 August 2007.
2. For the Council to decide to either endorse or withdraw the submission.

EXECUTIVE SUMMARY

3. Environment Canterbury notified Variation 4 to the PNRRP on Saturday 23 June 2007. This variation affects PNRRP Chapter 5: Water Quantity. The Council made submissions on Chapters 4-8 of the PNRRP in December 2004 and hearings on parts of Chapter 5 have been held this year. The variation incorporates groundwater allocation limits for a number of groundwater zones into Schedule WQN4 and includes related amendments for implementing groundwater allocation. The submission period closed at 5 pm on Friday 3 August 2007.
4. The main impact of the variation is to change the total amount of water that can be abstracted (the allocation limit) for a number of groundwater zones throughout the region i.e. Selwyn-Waimakariri, Valetta, Mayfield-Hinds, Pareora, Makikihi, Waihao-Wainono and Waitaki. Small tracts of land on the periphery of the CCC boundary are located within the Selwyn-Waimakariri Zone. The total allocation limit for this zone has been reduced from 131.9 million m³/year to 121.3 million m³/year. Effective allocation currently stands at 133.37 million m³/year (120% of the allocation limit). This makes the Selwyn-Waimakariri Zone a “red” zone, meaning that groundwater is already fully allocated. Any application to take water from a fully allocated zone is a non-complying activity (Rule WQN22).
5. The key implication for the Christchurch community water supply is that it will be difficult to access water from the Selwyn-Waimakariri Zone, should additional water be required in the future. The submission includes a request to amend Rules WQN19, WQN20 and WQN22 to change the level of activity, from non-complying to restricted discretionary, when the taking of water from a fully allocated zone is for the purpose of group or community drinking water supply.
6. At this stage, no allocation limit has yet been set for the Christchurch Zone, which is the source of the city’s community drinking water supply. In the absence of an allocation limit, any application to take water from this zone is deemed to be non-complying (Rule WQN23). This means that any application for new wells in the Christchurch Zone will be a non-complying activity until an allocation limit has been set. ECan has indicated that the setting of an allocation limit is scheduled for 2009/2010. The submission includes a request to amend Rules WQN19, WQN20 and WQN23 to change the level of activity, from non-complying to restricted discretionary, when the taking of water from a zone for which no allocation limit has been set is for the purpose of group or community drinking water supply.
7. Other submissions include:
 - support for proposals to better provide for allocations for group and community drinking water supplies;
 - opposition to a change in the approach for setting allocation blocks, and to including the stream depletion effect in a surface water allocation block when it is also included in the groundwater allocation block; and
 - a variety of requests concerning the setting of restrictions and reviewing of water permits, in particular, that these provisions should only apply once the plan becomes operative.

FINANCIAL IMPLICATIONS

8. While there is no guarantee that the submissions will be accepted, if successful the amendment sought would reduce the cost of preparing resource consent applications to take water for community supply. There are also implications for sourcing additional water for community supply in the future. Water sourced close to the city will be less expensive than that sourced from further afield, and the greater the RMA barrier, the more expensive the process of securing alternate supplies, should they be needed.

Do the Recommendations of this Report Align with 2006-16 LTCCP budgets?

9. The cost of preparing and presenting submissions is covered by existing unit budgets.

LEGAL CONSIDERATIONS

10. The RMA 1991 (First Schedule, Part 1 (6)) allows Council to make submissions on a variation to a regional plan.

Have you considered the legal implications of the issue under consideration?

11. A legal review of the submission has been carried out.

ALIGNMENT WITH LTCCP AND ACTIVITY MANAGEMENT PLANS

12. Page 166 of the LTCCP includes the objective "To conserve and protect the long-term availability and quality of the city's water."

Do the recommendations of this report support a level of service or project in the 2006-16 LTCCP?

13. The submission aims to assist the Council in meeting demand for water supply at a reasonable cost and supports the levels of service for water supply set out on page 167 of the LTCCP.

ALIGNMENT WITH STRATEGIES

14. This submission supports work being done in preparation of a draft Water Supply Strategy.

Do the recommendations align with the Council's strategies?

15. As above.

CONSULTATION FULFILMENT

16. Not applicable.

STAFF RECOMMENDATION

It is recommended that the Council endorse the attached submission on Variation 4 to the PNRRP Chapter 5: Water Quantity.