

SUBMISSION ON PROPOSED PLAN CHANGE 1 TO THE WAIMAKARIRI RIVER REGIONAL PLAN

Date 10/09/09
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Irrigation New Zealand Inc. wishes to be heard in support of its submission. However, if others make a similar submission we are happy to present jointly.



(Andrew Curtis CEO Irrigation NZ)

Overview

INZ is a national body that promotes excellence in irrigation development and efficient water management throughout New Zealand, based on the principles of responsible and sustainable management of water resources.

INZ has reviewed the Waimakariri River Regional Plan (WRRP) Proposed Plan Change 1 (PPC1) and requests for its immediate withdrawal.

INZ is concerned about the approach taken to and the timing of this plan change, specifically in relation to its implications for the proposed CWMS (Canterbury Water Management Strategy). The CWMS has been a long-term collaborative process engaging key stakeholders within the Canterbury community. To jeopardise the CWMS process at this stage would be extremely detrimental to the region, preventing the community from developing win-win scenarios (cultural, social, environmental and economic values) with regard to its greatest asset – its abundant water resources.

Despite the request for the withdrawal of WRRP PPC1, INZ would like to work with ECan to help co-ordinate the development of a more suitable water allocation regime. We would be happy to meet with you to discuss and explain our submission points in more detail.

INZ's Makes it's Submission with Regard to the Whole of the Waimakariri River Regional Plan Proposed Plan Change 1

Oppose

INZ submits that ECan has not adequately considered, particularly with regard to future economic impacts, the proposed methodology for managing the competing demands of water abstraction and in-stream values on the Waimakariri river.

In particular, INZ opposes the minimum flow at which "B" block abstraction may commence being raised to 104m³/s for the Waimakariri. This will result in a 30m³/s 'gap' being established between the A / B1 and B allocation blocks, which has major implications for the viability of the proposed Lees Valley storage and thus the future of the CWMS.

INZ submits that an alternative regime of one to one sharing above the A / B1 block minimum flow, would better meet all community stakeholder requirements as set out in the CWMS.

INZ opposes PPC1 as –

1. The WRRP should not contain any rules or policies that undermine the CWMS. In particular, the proposed abstraction of Waimakariri River water for a Lees Valley storage site must be allowed for, including the possible requirement for a weir across the Esk River. Capping the B block at 40m³/s and making further abstraction a non-complying activity, would also limit the potential for an integrated approach to the future development of irrigation within the region.
2. There must be no decrease in the reliability of supply to existing consent holders. This should be a principle that is clearly stated throughout the WRRP. This has not been adequately assessed in the supporting documentation; nor has the reliability of B block water under the alternative regimes that were considered.
3. There should be no policies or rules that prohibit water takes. Any water takes that are not consistent with the policies should be defined as non-complying. Otherwise a prohibited classification may restrict some viable water uses in the future.
4. Requiring abstractions to cease for river flushing should be determined using a balancing between the needs of the river and the needs of abstractive users. The number and duration of times when abstractions must cease should be minimised so as to avoid any unnecessary disruption to irrigation activities. Recent irrigation restrictions due to low flows should be taken into account when a flushing flow is being considered.
5. Water metering requirements for abstractions from the river is supported.

6. Further consideration needs to be given to a one to one sharing regime, rather than establishing a gap between allocation blocks. The analysis of flow variability carried out by ECan does not adequately account for variations in demand.
7. The economic impact of the proposed plan change (especially in terms of reduced viability for new irrigation development) has not been adequately addressed in the Section 32 report.

Decision Sought

INZ requests the Plan Change be withdrawn, rejected, or otherwise amended to remove –

- the 30m³/s 'gap' between the A / B1 and B allocation blocks
- the allocation cap for the B block,

together with any consequential amendments necessary to give effect to this submission.

INZ would accept an alternative rule which required one to one sharing of B block water above the A / B1 allocation block.

INZ Submission Ends