

Waipara River Group Submission
To The Hearing Commissioners On The Proposed Waipara Catchment
Environmental Flow and Water Allocation Plan.
Re: National Policy Statement on Freshwater 2011 and Proposed
Canterbury Regional Policy Statement 2011.

Please refer to Section 42A report. Addendum #2 - July 2011

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Water Quantity

Objective B1.

To Safeguard the life-supporting Capacity, ecosystem processes and indigenous species etc.

There is an implication here that abstraction is causing a list of ills. In the evidence presented there was no suggestion that abstraction caused the failure of the river mouth to open, or could in any way significantly affect the size of freshes or floods. And the fact that the river runs dry naturally above all abstraction whilst flowing in lower reaches was accepted.

Should the commissioners feel that the evidence of the Ecan 'experts' was in any way flawed it would surely be wrong to give any extra weight to those opinions.

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Policy B5

...no decision will result in future over allocation- etc

To see the river as over allocated requires belief in the 'concrete drain' view of the Waipara River, ignoring the huge buffer held in the river gravels.

Current consents have not been increased over the last 17 years. There have been significant reductions in the rate of take and daily volumes when transfers have taken place. Flow meters will allow takes to be reduced to actual need or use. Thus future reductions are already built in to present proposals.

When considering Community use of water it would seem appropriate to remember that employment from within the community is an end product of the use to which irrigation is put and needs to be weighed against the more ephemeral environmental benefits.

Matters to Consider

The report suggests that future replacement consents should be restricted to the 'rate of take and volume that reflects existing use, rather than consented takes' this seems overly restrictive and would need to take seasonal variations and other practical matters into consideration.

The early reviewing of resource consents raises the spectre of instability, insecurity and uncertainty to add to the eight years we have already endured! To say nothing of the time, energy, and distraction from our businesses, which we can ill afford.

The cumulative effects of small takes has been thoroughly discussed earlier in the hearing, I would just reiterate that it takes a concrete drain view of the river to make any sense at all.

Hurunui/Waiiau ZIP

In the recently published Zone Plan The committee strongly supports the Augmentation of the Waipara River as part of the proposed Irrigation Scheme.

A more recent development is that the scheme to dam the Waitohi River Valley with water from the Hurunui favoured by environmental groups is looking more affordable than previously thought. This makes the potential augmentation of the Waipara River to bring environmental benefits, within the near future, more likely.

In conclusion I would remind the commissioners that by length , over 90% of the Waipara River is upstream of all irrigation takes, consequently over 90% of the flow in the Waipara River is completely unaffected by abstraction.

Tom Porter
For The Waipara River Group