

## **Submission to Proposed Canterbury Land and Water Regional Plan**

Attention: Environment Canterbury  
PO Box 345  
Christchurch 8140

*Submission in relation to proposed variation 2 Hinds Plains to the proposed Canterbury Land and Water Regional Plan*

**Longbeach Estate (William David Thomas owner) Submitter**

I wish to speak to my submission.

### **Introduction**

My name is William D (Bill) Thomas. I farm the Longbeach Estate (1,256 hectares), located at 1754 Longbeach Road, RD 4, Ashburton 7774. I have been farming Longbeach Estate for 31 years.

Longbeach Estate was first farmed by John Grigg in 1864 and has remained in our family ever since.

Longbeach Estate underwent a remarkable transformation process under the management of John Grigg. The land was transformed from a mostly impenetrable bog which resulted in the formation of the Hinds River mouth. Drainage was cut which led to 240 kilometres of clay field tiles draining the swamp into open drains. The field tiles came from a brick works constructed on Longbeach Estate.

Three of these drains today make up the Eiffelton Irrigation scheme, namely: the Windermere, Deals and Home drains which are subject to current minimum flows.

Groundwater level is higher in more impervious material and this is the reason for the water being near the surface in the Tinwald, Willowby and Eiffelton areas. The variety of soils found is exceptional, 27 soil types are recognized. In general the soils are moist and easily worked. They overlie a high water table and are liable to become very wet. This is evident wherever the drainage works are not functioning efficiently. The average rainfall near the coast is 675mm.

This submission argues that there is a lack of evidence to change water consents, and any change will negatively impact low land farmers.

## Scope of Evidence

### 1. Minimum Flows

I believe the current minimum flows (l/s) are highly successful, adequate and should remain unchanged. I support the evidence of the Eiffelton Scheme (submitter number 56798) namely that minimum flows are unchanged. If under the proposed recommendations (table 7 page 44) in the ZIP Addendum Hinds Plains Area report dated 21 February 2014 the COMAR report requirement of LWRP natural MALF(l/s), it is calculated that the Eiffelton Irrigation Scheme would need to use 40% of its ground water abstraction to meet those proposed new minimum flows.

Water moves and varies responding to changes in annual recharge, actual use and accessibility of water held in storage. The current minimum flows have proven successful since the 1990s. Increasing the minimum flow would lead to a significant financial impact on low land farmers, as a 40% reduction in irrigation water used correctly against that 40% not being used and going out to sea. The proposed minimum flow would create wastage of water and energy required to pump that water. I believe there is also a significant lack of evidence to justify that increasing the minimum flow would have any long term benefits.

### 2. Minimum flow recorder sites

I believe the minimum flow recording sites are in the correct place on Poplar road as per the evidence provided by The Eiffelton Scheme (submitter 56798).

The Telemetry is of the latest technology and at the time of instalment was supported by Environment Canterbury and Fish and Game. The hardware was financed by the Eiffelton Scheme members. There is no evidence to justify the cost or if there is any benefit of moving these monitoring sites.

### 3. Protect current water availability for Landowners

The Eiffelton scheme is unique in that it takes ground water for the purpose of augmenting surface water flows, thus supporting on farm irrigation and the ecological values in the drainage network. Individuals have spent significant capital on farm in both irrigation plant infrastructure and large storage ponds. I believe that if the minimum flows are increased to the proposed 40% of water supplied, Environment Canterbury would be failing to deliver its strategy under the Canterbury Water Management plan to maintain farm viability and provide for further economic growth in the Eiffelton district.

This submission argues that Environment Canterbury are penalising existing low land farmers by changing the terms of their water consents to benefit newer users in the upper catchment. There is no significant evidence to warrant an increase in the existing minimum flows.

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