EISI Area Characteristics

Approximately 120 farms/irrigation water take consent holders
Type of land uses: Agriculture, Nursing homes, Dairy farms, dairy support, Process vegetable crops, Vegetable production, Broiler farms.
High quality production on highly fertile and high water holding soils
Irrigation used as an 'as needed' basis rather than continuous summer rotation.
Irrigation wells (less than 35m depth) have always been highly reliable;
Lowland stream flows have decreased with fewer 'good' winters and the excessive allocation and use of water to the upper plains area;
More often than not water is a problem here because there is an overabundance rather than a shortage, this is why some EISI parties were submitted on the Central Plains Water Enhancement Scheme.
**Why are we here?**

The Society wants and has the expectation that Variation 1 should deliver:
- Objectives, policies and rules that work in practice.
- Has a sound, sensible and implementable approach; and
- Will achieve the desired environmental goals.

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**Groundwater Allocation**

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**Water Allocation Transfers**

- Transfers of water allocation should only occur where they are in close proximity to the original consent and within the same water character area;
- Transfers even with an amount having to be relinquished could still result in increased environmental impacts;
- Water transferred to upper plains from down plains will result in further adverse effects on nutrient levels and lowland stream flows.
Cultural Landscapes/Values Management Areas

EISI concerns:
- CLUWA imposes a high level of regulation on large areas of land surrounding Lake Ellesmere/Salt Lake, even though robust management and any potential effects may be placed on a cumulative entire zone scale.
- Landholders within CLUWA's and River Zones will have major costs attributed to them, e.g., relating to RSP's, riparian planting. Harts Creek and Bogg Creek examples.
- Provisions of PLWRP and the Selwyn District Plan already provide significant protection of cultural sites.
- There was no consultation by CIRIC regarding the CLUWA with those landholders directly affected.
- River zones maps were not politically notified and inappropriate to refer to a zone in the Variation which is not shown on a map. This creates interpretation problems when applying for consents, e.g., Waihou Stream example.

What works well
- Direct consultation between landholders and various interested parties, e.g., Waitakere Stream agreement with Te Taurumotu Runanga and landholders. This resulted in Variation 1 provisions being appropriate and suitable for both parties;
- Non-regulatory approach to riparian management, e.g., Harts Creek and Bogg Creek projects.
Riparian Margins

- No need to regulate this through rules as current farm, stream care and community group practices are resulting in good outcomes for streams and waterways.
- Inappropriate to apply riparian margins to drains, especially ephemeral ones.
- Rules around riparian margin setbacks for cultivation would be difficult to 'police'.

Minimum Flow Levels for Rivers/Streams

- Any minimum flow levels should only be applied on consent expiry after 2025 due to legal implications:
  - Conditions of consent cannot be imposed that effectively make the consent unusable; and
  - Conditions of consent cannot relate to the duration of a consent.
- Flow levels need to recognise the reality of the physical environment and the economic impacts associated with extreme unreliability for irrigation.
- Significant care needs to be attributed when considering when to impose such new levels based on the impact of the CPW scheme.