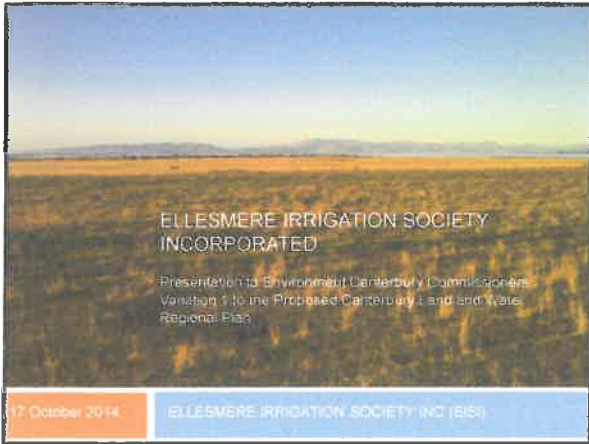
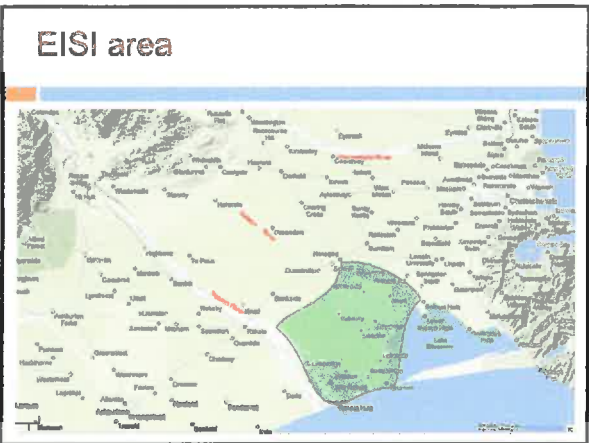


Tabled at Hearing 17/10/14





EISI Area Characteristics

- Approximately 120 farmers/irrigation water take consent holders
- Type of land uses - **Arable, Sheep, Dairying and dairy support, Process vegetable crops, Vegetable Production, Blackcurrants.**
- High quality production on highly fertile and high water holding land
- Irrigation used on an 'as required' basis rather than continual summer rotation.
- Shallow wells (less than 35m depth) have always been highly reliable;
- Lowland stream flows have decreased with fewer 'wet' winters and the excessive allocation and use of water in the upper plains area;
- More often than not water is a problem here because there is an over abundance rather than a shortage, this is why some EISI parties were submitters 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

Groundwater Allocation

The map shows various water allocation areas. Two specific areas are highlighted with red text:

- High allocation area - stony and faster draining soils, Very intensive land uses** (located in the upper central part of the map)
- Reasonable allocation area - heavier and high water-bearing soils, less intensive land uses** (located in the lower right part of the map)

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:

- CLVMA imposes raised level of regulation on large areas of land surrounding Lake Ellesmere/Te Waihora even though nutrient management and any potential effects may be caused on a cumulative entire zone scale;
- Land holders within CLVMA s and River Zones will have major costs attributed to them e.g. relating to FEP's, riparian planting, Harts Creek and Irwell River examples;
- Provisions of PLWRP and the Selwyn District Plan already provide significant protection of cultural sites;
- There was no consultation by CRC regarding the CLVMA with those land holders directly affected;
- River zones maps were not publically 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. Waikewai Stream example.

What works well

- Direct consultation between land holders and various interested parties e.g. Waikewai Stream agreement with Te Taumutu Runanga and land holders. This resulted in Variation 1 provisions being appropriate and suitable for both parties;
- Non-regulatory approach to riparian management e.g. Harts Creek and Boggy 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.
