

Supplementary Information for a Submission on an Application for Resource Consent under Section 96 of the Resource Management Act 1991

To: **The Commissioners, Central Plains Water Trust and Ashburton Community Water Trust Resource Consent Hearing**

From: **Members of the Paparua Water Race Irrigators Group.** (list of names and addresses previously appended)

Address: c/- AM Nicol, Old West Coast Road, RD 1, Christchurch

Date: 24 July 2008

Representation

I, Dr Alastair Nicol, represent an informal group known as the Paparua Water Race Irrigators (PWRI)

Background to the Paparua Water Race Irrigators Group

As a component of their Resource Consent to take water from the Waimakariri river Selwyn District Council (SDC) can allocate up to 800 l/sec (0.8 m³/s) for purposes of irrigation from its Paparua stock water race system. Some 55 properties, representing about 2000 ha, have irrigation allocations from this scheme through SDC. Almost all of these properties are east of the area covered by CPWT proposals.

The cost of water to users of this scheme on an annual basis is \$260/l/s and rising.

Like all run of river schemes we are subject to partial water restrictions as the Waimakariri flow at the Old Highway Bridge reduces from 60 to 41 cumecs and total restriction below 41 cumecs.

These restrictions have resulted in last two years in an annual average of 68 days of total restriction and a further 124 days of partial restriction (reduced days per week) out of a total of 272 days a year. SDC loses income from the scheme through rebates to users for non-irrigating days.

Basis of submission

General support

As irrigators we support the overall concept of CPW but we have specific concerns about the impact of CPW on the PWRI scheme and unless these are resolved we, as a Group, cannot support the CPWT Resource Management applications.

Specific concerns

The concerns of the PWRI are of 3 types:

- 1) Detrimental impact of CPW on the number of irrigating days per year for PWRI
- 2) The potential disruption to PWRI during construction and from by-washes affecting the PWRI intake from the river
- 3) Potential for a wider community benefit of CPW through augmentation of PWRI

Impact of CPW on the number of irrigating days for PWRI

It is clear from the AEE and particularly from Cliff Tippler's response to Leo Fietje (7 Dec 2007, copy attached) that the number of Waimakariri river low flow days of a short (5-10 days) duration will increase 2 fold with CPW in operation. Any *increase* in the number of low flow days means a *reduction* in irrigation days available to PWRI. We do not have the resources to make a full analysis of the impact of CPW on our scheme. However, using the last two year's data (which are not necessarily typical, but we do not have access to a longer time series), even a 50% increase in the number of low flow days would have reduced the proportion of irrigation days available to PWRI from 52% of potential to 29%. Such a reduction in irrigating days would likely result in irrigation from the PWR being neither biologically nor economically viable. As a group PWRI, and SDC in terms of their income from irrigation, we will be severely disadvantaged by CPW and therefore we cannot support the scheme in its present form for this reason.

Potential disruption to PWRI during construction of CPW

I suspect our concerns (indicated in our submission) about disruption to PWRI during construction and operation of CPW will be addressed and concerns about by-wash affecting the river will be protected by ECan so we are less concerned now about this aspect of CPW than in our initial submission.

Potential for a wider community benefit of CPW through augmentation of PWRI

We believe there could be positive benefits of CPW to PWRI through augmentation of the PWR system from by-wash. We understand continuous by-wash passed the last farmer will be a feature of CPW and reports refer to 'discharge into existing stock water

rates', although the only one specifically identified is at Sandy Knolls which is not part of the main PWR system, the intake of which is close to the planned Halkett discharge.

We can find no reference in any report to the actual volume of water involved in this surplus flow, but even a small augmentation (say, 0.4 m³/sec) of the main PWR system during low flow periods would probably help considerably to offset the increase in low flow days and maintain the integrity of the PWR system. We note that applying by-wash water to ground is the preference of Ngai Tahu. We believe this opportunity must be investigated by CPWT in terms of its commitment to the wider community benefit

Summary

In summary, before the PWRI Group can support CPWT Resource Consent applications, we need:

- 1) acknowledgement by CPWT that PWRI will be disadvantaged by CPW and that some compensation will be required.
- 2) a commitment from CPWT, that serious consideration will be given to augmenting the PWR to:
 - a. offset the disadvantages to PWRI of reduced irrigation days due to CPW
 - b. increase the impact of CPW by extending the irrigatable area associated with the scheme
 - c. demonstrate CPWT commitment to the wider community benefit.