

ASHBURTON DISTRICT COUNCIL

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In reply, please quote:

If calling, please ask for:

2nd October 2009

Dear Sir/Madam

Draft Canterbury Water Management Strategy

The Council endorses the vision for a sustainable framework to water management in the Canterbury region and supports the principles developed for the strategy.

With both the Mayor and Chief Executive being on the Mayoral Forum, the Council has a commitment to the draft strategy.

To reflect the integrated approach to water management proposed it is important that the Council continues to be involved with representation on the Zone Water Management Committee covering Mid Canterbury. The Council supports the proposed boundaries of the Ashburton Water Management Allocation Zone, incorporating the catchments of the Rakaia and Rangitata Rivers.

The key issues referred to in Section 2 of the draft strategy are most prevalent in Ashburton District. As exemplified in Figure 3 (Summary Map of Supply and Demand Situation in Canterbury) water resources in Mid Canterbury are under greater pressure than elsewhere in the region. It is therefore important that the Council is represented on the Regional Water Management Committee.

Engagement with stakeholders over the last 12 months demonstrates that the process has been well informed. It is hoped that the Ashburton District community takes the opportunity to comment on the draft strategy at this time.

Importance of Irrigation to Ashburton District

While Canterbury has 70% of the irrigated land in New Zealand, Ashburton District has the greatest share within the region. The importance of irrigation to the Canterbury economy has been highlighted in a Ministry Of Agriculture and Forestry report which states "For much of the Canterbury Plains, farm-based production is the basis of the communities and likely to remain so in the foreseeable future...Irrigation, rather than tourism or any other economic stimulus, is likely to make a more defining difference to communities in Canterbury than (other areas)".¹

Irrigation enables farmland to be more productive, supports a wide range of support and processing industries and services, provides strong economic multiplier impacts and enables both rural and urban communities in Canterbury to thrive. These benefits will no doubt be highlighted in the economic assessment currently being carried out as part of the CWMS and it is important they flow through to the final strategy document. The draft strategy refers to farm gate returns only and this underplays the important shared economic and social benefits that flow to the regional community and that will provide a basis for developing a regional vision for

¹ The Economic Value of Irrigation in New Zealand April 2004: MAF Technical paper 04/01

sustainable water management in Canterbury that encompasses the urban and rural communities of Canterbury.

Reforms to the Resource Management Act

The Council recognises the need for an integrated approach to water management and while the Government reforms to the RMA will be influenced to provide for delivery of the strategy (p33), there is a concern that the time scales for these reforms may delay the implementation of the strategy. If existing RMA mechanisms are used as suggested in the draft (p47), the Implementation programmes may not be delivered as quickly as envisaged subject to the phase 2 amendments to the RMA.

It should be recognised that the Regional Policy Statement and Regional plans may need to be reconciled to give effect to the Water Strategy and Implementation programmes. The effectiveness of delivering the strategy will also be dependent on appropriate weight being given to the proposed Regional and Zone Implementation programmes if existing RMA mechanisms are not used. How these fit into the existing framework of resource management documents is also a key issue that needs to be addressed without leading to a plethora of plans as recognised on p47.

The Council therefore supports a process that enables delivery of the strategy in a timely manner.

Targets

The goals set to reflect the principles of the Water Strategy are generally acceptable to the Council. The identification of activities is beneficial to all stakeholders, although some activities do not have a lead agency identified. The other agencies responsible for delivering the targets should also be included to ensure there is an understanding of responsibilities, and accountability amongst stakeholders

In the tables of activities, there are actions that District Councils have an important role in implementing, for example, 'management of land-use adjacent to rivers to protect/ enhance aquatic biodiversity'. This should be recognised in the final document.

The following comments relate to the specific categories of targets–

- Drinking Water
There are some non-council community water supplies that may fall outside the goals of the strategy – i.e. do not meet drinking water standards and are not treated. These small schemes need to be treated on the same basis as individual well supplies.

In the table of activities, TLAs are identified as the lead agency for a number of actions. Further advice on how these are taken forward is sought in implementation of the strategy, and specifically, methods for specific land use controls over 'hot spots'.

- Ecosystem health/ biodiversity
To reflect work already underway, the Goals from 2010 should include the restoration of O Tu Wharekai (Ashburton lakes/Upper Rangitata river),
- Water use efficiency
With regard to the target for all irrigation, stockwater and industrial/ commercial use in Canterbury to operate according to best practice, efficient water use may not be achievable unless best practice becomes a requirement. It is therefore recommended that best practice on water use is given effect to in water supply agreements.

There should also be a more explicit reference to the gains from more efficient use of water in urban areas.

Implementation

Collaboration and a willingness on the part of all stakeholders is critical, and it is therefore important that outside the formal structures proposed, there are early and ongoing discussions with key stakeholders to address concerns that may otherwise cause delays later in the process.

The options have been reviewed and a combination of the options as put forward by the subgroup for mid Canterbury (p91) is supported by the Council -

- Strategies supporting targeted initiatives for environmental protection (Option B)
- Reconfiguration of resource consents and infrastructure over the long term to provide for efficiencies in water use (Option C)
- Initial development of small scale infrastructure (Option D) leading to larger scale infrastructure in the longer term

The sustainability appraisal of the options is commended for the approach to assessing the options.

Section 5 of the strategy (p49) indicates the costs associated with implementation will be incurred in the early stages, and will be met by ratepayers. While the Council recognises the importance of delivering the strategy, there needs to be a strategic regional approach to funding so that the rate burden is fair and reasonable.

While the Council appreciate that the infrastructure projects identified in Section 5 (p50) have not been subject to a detailed assessment, it is important there are other 'back-up' options available, should the projects on the shortlist not be consistent with the principles and targets of the strategy. Early discussions with District Councils on the infrastructure proposed will be important to ensure incorporation into District Plans.

Water Governance Structure

Council supports the proposed governance structure and supports the principle of subsidiarity guiding the structure with decision-making being made at the local level within a regional framework.

The establishment of Zone Water Management Committees is supported as is the general requirement that members of zone committees should live within the zone. In

terms of the options available for establishment of committees, appointment of chairperson and payments to committee members this Council submits the following:

- The process of initial formation should be undertaken through an appointment process with a subcommittee being established from members of the Steering Group for each zone to provide recommendations to the Steering Group and then to the Mayoral Forum and Minister for approval. Council supports the proposal for committees to comprise specified members and representative members as proposed in the strategy
- The proposed process of regeneration is supported.
- Appointment of chairperson should be undertaken by the Zone Water Management Committee
- Committee members should be paid a meeting allowance and be fully paid for additional work undertaken if this is not covered by their employer. This will be necessary to ensure there are no barriers to achieving the desired range of representation on the committees.
- This Council will support appropriate servicing of the committees by Council staff.

Council supports the proposed composition and functions of the Regional water Management Committee as outlined in the strategy.

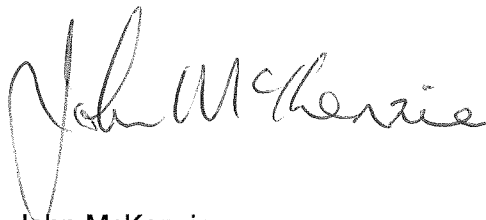
Summary

The Council support the vision and principles of the strategy and recognise the challenges that need to be addressed to enable the strategy to be implemented. It is important there is continuing engagement and agreement from all key stakeholders to the strategy to ensure it is delivered in a timely manner.

Yours faithfully



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Democracy and Community Services
Manager



John McKenzie
Environmental Services Manager