

Submission on Canterbury Water Management Strategy

From Hurunui Water Project Limited

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Introduction

The Hurunui Water Project is a project that has been in conception and researched for the past nine years. It is the brain child of a group of farmers, landowners, Ngai Tahu Property and MainPower, and represents the desires of the North Canterbury Community to try and find a way to make the district work for them, both in life-style and well-being. It is also the result of a significant amount of research into the available options, and these have been investigated alongside, and in tandem with much of the work conducted by the Canterbury Water Management Strategy. The fact that HWP is a limited company is a function of the available means to raise funding to accommodate the intellectual development. It has succeeded in reaching the point where a viable project has been designed. It has been accepted as a project for resource consent, but it has yet to go to hearings to find if it is successful. Unfortunately, it has been the subject of a huge amount of controversy based largely on misunderstanding and misrepresentation by a minority of environmental stakeholders who are not keen on any development on the river at all. It is the strongest desire of the Hurunui community that the project has a chance to be considered in any shape or form, and it is for this reason that the project is promoting itself as an opportunity for the Canterbury Water Management Strategy to allow the Hurunui catchment to test itself as a Zonal Committee. If the process works, we will find the best solution for the district, and there will be buy-in for the process.

It is with this in mind that the Hurunui Water Project suggests the following changes, or improvements, to the Canterbury Water Management Strategy. It is very supportive of the strategy in general, and would like to see it work, especially since it offers a collaborate process, and itself represents the mindset of the Canterbury Region at large.

Addressing comments in the order that the strategy is laid out, the following amendments are suggested with respect to the Vision and Strategy in Section 1 :

1. The "Hurunui Integrated Option" is first introduced on page 14. This terminology is misleading, and does not express the full complement of options for North Canterbury. Although the South Branch and Lake Sumner are mentioned on page 131 in Annex J as North Canterbury Options, they are completely ignored in Table 1, p.133 as Potential Strategic Options. In discussion with various people, a lot of them consider that the "Hurunui Integrated Option" excludes the HWP as an option. Clearly, it is difficult to support a strategy that does not allow for this option to be considered at all. We would like to see the Integrated Option more clearly defined, with the South Branch of the Hurunui River, and Lake Sumner as considered options. This is especially true since there are no other North Canterbury options that have been viable in any respect up to this point, and to dismiss the HWP option is to effectively shut down irrigation for the district with the associated increase in well-being and economic value.

2. North Canterbury in the Hurunui District only has a tiny proportion of irrigated land, and for the most part, the land is dry land, does not have access to any water for any cost, and does not have some of the inherited problems of over-allocation, land-intensification during a time of poorly understood environmental impacts, or unhealthy river problems (other than those introduced by careless fishermen and boat users). It seems unreasonable that it should have to suffer for the historical situation of other regions of Canterbury when the knowledge today of best-practices is at such a high level that all of the known negative issues associated with irrigation can be eradicated with strict controls. It therefore seems harsh that North Canterbury should be subjected to the same stringent level of water priorities as the rest of the region. Surely, it is a first priority for North Cantabrians to have access to reliable water, and it goes without saying that it will be used efficiently and productively. The visionary order on page 20 just does not apply when there is practically no water to begin with.

Annex G, Targets in Detail:

1. **General point** – it is not clear that it is up to the zonal committees to determine the finer details and account for local issues regarding targets. For example, the Hurunui River has a different starting point to other rivers as it is minimally adapted today. Any change is likely to impact nitrate levels even though they might still end up as the best in the Region. Or, what would happen if it is decided by the Zonal committees that it is necessary to consider treated water for drinking water even though it is against the goals in the targets. Is there any ability to interpret these guidelines? If so, where does it say that?
2. **Irrigated Land Area, goals** – the goals for irrigated land are not compelling for under-irrigated areas where there are potential projects already underway. It would be good to see clearer targets for 2015 or 2020 with increasing levels of irrigated land by this stage. The numbers in the strategy suggest that we have ten to twenty years of environmental research before construction or irrigation storage is underway. That is too long.
3. **Irrigated Land Area, reliability** – a goal of 95% reliability is too vague to be meaningful. It needs to state over what time period it is referring to as 95% could mean 50% reliability for one year in five, which is effectively 80% on average. A suggestion here would be to state 95% in critical months, or in any one year otherwise it is not helpful.
4. **Ecosystem Health/biodiversity** – The wording “no loss of natural wetlands” should read no net loss of natural wetlands. To avoid any loss would effectively close down most water storage developments and is not consistent with RMA standards.
5. **Ecosystem Health/biodiversity, birds** – please specify which water dependent birds are at risk, otherwise we will have to avoid declines in populations of any birds, including pests.
6. **Water use efficiency** – to state “no decline in the efficiency of water use” assumes that all regions start from the same place. In a region where there is currently limited irrigation, there are potentially multiple different uses of water, and not all uses employ water at the same efficiency, it could be penalising to use one measure. It would be good to see a measure that incorporates the multiple types of land usages and makes adjustments accordingly.

7. **Natural Character, process and ecological health of braided rivers** – The first sentence should be modified to say “The braided character of Canterbury’s braided rivers is maintained as far as possible.” The current wording excludes the ability to use any water from braided rivers.
8. **Natural Character, process and ecological health of braided rivers** – The wording “No new dams on the mainstem of major alpine braided rivers” pre-empt the final decision of the Hurunui Water Conservation order, does not allow for the current resource consent process to be heard, and excludes using any water from lake Sumner unless it is considered that the semi-permanent weir proposed in the HWP is NOT a dam. The **clarification of the word “dam”** needs to be made, and the Hurunui River is not considered to be a major braided river by everybody, especially if you consider the mean flow. The Hurunui has only a quarter the flow of the Rakaia, even at its fullest point at the Mandamus confluence. The North branch is one tenth the size of the Rakaia, and the South Branch is one twentieth.
9. **Natural Character, process and ecological health of braided rivers** – goals by 2015. You need to clarify the meaning of “protection” of habitats and introduce some aspect of reasonableness such that they are not closed for any development, even if they are replaced elsewhere by like habitats.
10. **Recreational Activities** – Goals in 2010 should include the wording “No significant loss of existing diversity and quality of water based recreational opportunities”. There needs to be some admission that there could be some change, even though there should not be a net loss in opportunities. Likewise in 2020, the environmental flows should enable a mix of recreational use. A typo in 2040: remove “has been restored”.

Annex H: Integrated Management Framework

1. **Zone implementation programme** – this section needs clarification to account for existing projects. It does not appear to offer more than a stock-take of the existing framework, and will effectively stop progress on any infrastructure project for the first year while the committee reviews existing legislature. Clearly some of this has to be done, but it would be useful to see some real progress made in the first year, to test out the viability of the programme. It does not fit with the stated CWMS to work on implementation programmes in the first 0-5 years (page 38). Nor does it take into account any existing projects that might have already covered many of these stocktaking issues. New projects need to see if their opportunity fits within the zonal strategy. There needs to be a recognition that there are active projects already in progress, and that these need to be absorbed into the strategy at different stages of development.
2. **Zone implementation Programme** – While we understand the need for local participation in the zonal committee, and support that, it is not clear how representation of existing live projects, such as HWP, will be included.

Appendix to Annex I:

1. **High Country Lakes** – What does “avoid level controls (eg weirs) and other barriers to connectivity” mean? Does “avoid” mean “prohibit” or is there room for movement if it can be proven that fish passage is maintained and that the health of the river is improved or not

deteriorated as a result? This sentence is concerning with regards to HWP as it could effectively shut down any option to develop the Lake Sumner aspect of the project, which is potentially the cleverest solution to minimal environmental effect water storage that is available. The word “avoid” is also use with regard to fish passage in braided rivers, even though there are potential mitigation solutions that could overcome the issues with some species of fish and in certain conditions. Clarification is needed.

2. **Reference to the water conservation order** – on Pages 131 and 134. It is not made clear that the South Branch option on the Hurunui River is still an option under the WCO recommendation.

Conclusion and Summary

To conclude, the HWP would like to stress its support for the concept of the Canterbury Water Management Strategy overall. It has real potential to create a more collaborate approach for water management in future, and offers an olive branch to the adversaries in the WCO and resource consent process on the Hurunui River. There does need, however, to be more transparency in the contents of the targets such that we are all clear that we are agreeing to the same thing. Provided that this is done, we are likely to be very keen to pursue the notion of the Hurunui catchment as a pilot for the zonal committee approach, and we anticipate an interesting year ahead.



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