

SUBMISSION FROM THE NORTH CANTERBURY FISH AND GAME COUNCIL

SUBMITTER: North Canterbury Fish and Game Council
3 Horatio Street
Christchurch

CHRISTCHURCH CITY COUNCIL: **Freepost 178**
Our Community Plan
Christchurch City Council
Christchurch 8003

This submission is made in reference to the Christchurch City Council's *Our Community Plan, Christchurch O-Tautahi 2004/14*.

Fish and Game Councils are Statutory Bodies with Functions (*inter alia*) to:

'manage, maintain, and enhance the sports fishery and game resource in the recreational interests of anglers and hunters

' to maintain and improve the sports fish and game resource by maintaining and improving access; ...

' In relation to planning, -

'To represent the interests and aspirations of anglers and hunters in the statutory process, ...and

'To advocate the interests of the Council, including its interests in habitats...'

Section 26Q, Conservation Act 1987

Submission

Section: Central Plains Water Limited, Vol 2, p144

Position: Oppose

Comments

The North Canterbury Fish and Game Council (NCF&G) is opposed to the involvement of CCC in Central Plains Water (CPW). We are also opposed to CCC supporting applications for CPW resource consents.

The aim of the scheme is to supply water for irrigation to 84,000 hectares in the Central Canterbury Plains. Anecdotal evidence suggests that this figure is over inflated and the area serviced by the scheme will be as much as 25% less than projects figure of 84,000 ha which includes un-irrigable land such as buildings, driveways and roadways. This has implications for the so-called economic benefits of the scheme.

Advocates of the scheme are promoting it as one of enhancement. In contrast, environmental groups are concerned with the impacts on the natural environment. NCF&G have concerns with impacts on the aquatic environment including fisheries and lowland streams. We also have concerns with the land use associated with the scheme development. It is widely accepted that agriculture has had a profound, negative effect on waterways in Canterbury. A scheme such as CPW has huge potential to significantly impact on water resources in Canterbury. It seems ironic to NCF&G that the city council is promoting a scheme which has the potential to impact on its constituent's drinking water and health.

Scheme advocates describe CPW as a "water management scheme" that will "enhance ecological and recreational values." In real terms the proposed scheme is an irrigation reservoir designed to take all water available above the limits set by the Rakaia Water Conservation Order (RWCO) and the proposed Waimakariri River Regional Plan (WRRP). To label it an "enhancement scheme" is misleading and euphemistic. Both the Rakaia and Waimakariri Rivers support outstanding recreational fisheries; this cannot be improved or replaced by a man-made reservoir. The reservoir will not be able to support a fishery nor will the water quality be suitable for contact recreation for some time. Recreation is likely to be unavailable from December to August - the peak recreational season.

The CPW timeframe has long run overdue and costs have increased in the time. The steering committee predicts that the consenting phase for CPW will be completed by April 2005. The scheme was expected to be operational by the 2008 / 09 irrigation season, yet further delays and demands on ratepayers money have continued.

Concerns of Fish and Game

NCF&G have many concerns regarding the CPW proposal. Dewatering of rivers is a key concern, particularly for rivers such as the Rakaia and Waimakariri, which are of local, national and international importance. Initial assessments indicate that the Waimakariri fishery will be affected by the scheme. It is predicted that salmon fishing days will drop from 11 to 7 days per year on average. Upstream salmon passage will also be disrupted by low flows and mixing of water.

Secondary impacts arising from resultant land use include contamination of waterways from fertilisers, increased sediment, nitrates and other chemicals. Pollutants from transport, effluent and discharges to land will have significant impacts on Canterbury's waterways.

The flows in lowland rivers such as the Avon, Irwell, LII, Heathcote and Harts Creek are expected to increase due to the displacement and discharge of water from the scheme. The effects of this are unknown; however there are likely to be implications for the ecology, amenity and recreational values of these rivers. Given that the water source will be from irrigation, we are concerned with the quality of this run off.

It is not clear from the Community Plan what 'raise \$4.5 million in capital' means and there is no indication of where that money will come from. The CCC needs to give people more information and assurance that rate payer's money will not be misdirected. However, Fish and Game take a stronger view and oppose the CCC involvement in the scheme. In the long-term, the agricultural impacts of this scheme could be far greater and far more expensive to remove than the net gains of a dairy-farm covered Plain.

Outcome sought

NCF&G do not wish to see CCC support an irrigation scheme that will be of benefit to a few and no benefit to the majority of ratepayers. We maintain that the CCC should support diversification of economic growth and not economic development based on unsustainable water abstraction. The potential threats to the regional environment and water resources far outweigh the benefits of an irrigation scheme that will service a few. To this end, we believe that it is inappropriate for CCC to hold shares in Central Plains Water irrigation scheme and they should withdraw from the process.

We wish to be heard in support of our submission

Rochelle Hardy,
Environment Officer
04 May 2004