

## WAIRARAPA REGIONAL IRRIGATION TRUST

### SUBMISSION TO GWRC PNRP – WATER ALLOCATION

1. My name is Bob Tosswill. I am the Chair of Wairarapa Regional Irrigation Trust.
2. WRIT was formed in 2007 with the purpose of fostering irrigation development in Wairarapa including via storage at a scheme or farm scale.
3. Water is of critical importance to the Wairarapa Community. Being able to store water and use that for beneficial uses including irrigation will both assist economically and environmentally. This will only increase in importance as climate change impacts kick in.
4. The basis of our original submission is that nothing in the PNRP should undermine the view expressed in the Regional Policy Statement that water storage (off channel) is a key tool to drive water use efficiency.
5. This remains our view.
6. We are aware of the detailed and technical submissions made by organisations such as Federated Farmers and Wairarapa Water Users Society and we support them.
7. We will use this hearings process to make our point of view known at a higher level.
8. As a point of principle, we would assert that given the role of the Whaitua process in the GWRC planning processes, it seems to undermine that role for the PNRP to make significant changes to parameters such as flows and allocations prior to the Whaitua reaching their conclusions and expressing them in a draft Whaitua Implementation Plan.
9. Throughout the Whaitua activity there has been community engagement and it is presumed that the WIP will reflect the values expressed by the community.
10. By making changes, the PNRP is pre-empting and in fact undermining the community engagement process.
11. We would ask that the PNRP where it relates to allocation policies and rules make no change to the existing Fresh Water Plan and instead acknowledges that the policies and rules will be established by the Plan Change process to formalise the Ruamahanga Whaitua WIP.

12. We note some new issues raised in the Officer's S42 report that provide us with some concern.
13. It is our strong view that the use of stored water is outside of core allocation limits as it has been harvested at times of good rainfall and is released when needed when the rivers are at low flows. This is the whole purpose of water storage.
14. This particularly applies to the rivers with mean flow less than or equal to 5m<sup>3</sup>/sec as Policy P117 now only allows 10% of the supplementary flow to be available. We would ask for filling storage to be exempt.
15. Potentially this provision would make all farm dams redundant if put in place.
16. It also would place community-infrastructure scaled development in jeopardy as while the primary water source is likely to be from a river with over 5m<sup>3</sup>/sec flow, the storage catchment is highly likely to contain small streams that fall into this policy. We would suggest that community water supplies are also exempt.