FURTHER SUBMISSION ON VARIATION 1 TO THE PROPOSED CANTERBURY LAND & WATER REGIONAL PLAN

To:

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Environment Canterbury

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Submitter:

New Zealand King Salmon Company Limited

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The New Zealand King Salmon Company Limited (NZ King Salmon) makes further submissions on Variation 1 to the Proposed Canterbury Land & Water Regional Plan ("Variation 1") in the **attached** table.

NZ King Salmon confirms it is a person who has an interest in the proposal that is greater than the interest the general public has (it is affected by the content of a submission).

NZ King Salmon would like to be heard in support of its further submission.

If other persons make a similar further submission then NZ King Salmon would consider presenting joint evidence at the time of the hearing.

A copy of this further submission has been served on the original submitters to which this further submission relates.

Mark Gillard

For and behalf of the New Zealand King Salmon Company Limited

Dated this 4th day of June 2014.

The submission supported or opposed	The particular parts of the submission supported or opposed are:	The reasons for support or opposition are:	Support or oppose
Ellesmere Irrigation Society Inc c/- C M Barnett Lakeside	Submitter 52210 Submission point V1pLWRP-910 Table 11(c): Selwyn Waihora Minimum Flows and Partial Restriction Regime for A Permits	The submitter has requested the deletion of the minimum flow levels for A permits for the Lee and Tentburn Rivers, and requested a replacement level of 700 L/s for the Lee River.	Support in part
R D 3 Leeston 7683		New Zealand King Salmon relies on the diversion of surface water from these rivers augmented by stream depleting groundwater takes for its hatchery operations. The proposed minimum flows in Variation 1 for these rivers may limit its ability take water at the same rate of take or volume at the time of reconsenting.	
		The submission is therefore supported in part insofar that accurately derived minimum flows should be adopted for the Lee and Tentburn Rivers, which take into account the existing level of consented abstraction, while at the same time continuing to prevent additional abstraction so as to protect instream values.	
		Higher minimum flows should only be introduced once the positive effects on river flows from upper catchment water storage, and reductions in groundwater use are known.	
Director General of Conservation Private Bay 4715	Submitter 52225 Submission point V1pLWRP- 244	The submitter has requested that non-compliance with the minimum flow and partial restriction regime in Table 11(c) under condition 3 of rule 11.5.32 be a prohibited activity under Rule 11.5.36 (instead of non-complying).	Oppose
Christchurch Mail Centre Christchurch 8140	Rule 11.5.35	Prohibited activity status for non-compliance with the minimum flow regime would be inappropriate. Non-complying status provides greater flexibility by allowing for staged increases in minimum flows over time where there will be a significant loss of reliability for existing water users. (as recognised by proposed policy 11.4.29).	