

**Submission on Proposed Waipara Catchment  
Environmental Flow and Water Allocation Regional Plan**

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Canterbury \* the organisation that this submission is made on behalf of.  
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Signature: [Signature]  
 (Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note: (1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

**Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991**

- ☐ Tick this box if you do not wish to be heard in support of your submission;  
☐ Tick this box if you do wish to be heard in support of your submission; and,  
☐ Tick this box if you would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing.

Return your signed submission by Monday 14th June 2010 to:

Freepost 1201  
 Proposed Waipara Catchment Environmental Flow and Water Allocation Regional Plan  
 Environment Canterbury  
 P O Box 345  
 Christchurch  
 Email: mailroom@ecan.govt.nz

(1) The specific provisions of the variation that my submission relates to are: (Specify page number and subsection numbering for each separate provision).

See attached sheet

(2) My submission is that: (State concisely: the nature of your submission, and clearly indicate whether you support or oppose each separate provision being submitted on, or wish to have amendments made, giving reasons.)

See attached sheet

(3) I seek the following decisions from Environment Canterbury: (Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)

See attached sheet

**A) 1. (Specific Provisions) Page P9 and 14 Policy 1.4, P 22 Part 9 Definitions**

Relates to hydraulically connected ground water.

**2. My submission is that:** In discussions with ECan staff abstractors have been lead to believe that takes from river gravels that are 3L/s or less would be regarded as the same as ground water takes with stream depleting effects and allowed to continue below the minimum flow cut off. It is unreasonable that ground water takes with same calculated stream depleting effects be allowed to continue, while those from galleries and open bores are subject to minimum flows.

**3. (Seek the following decisions from ECan)** To allow takes from such galleries and open bores that are for 3L/s or less to operate without a minimum flow restriction.

**B) 1. (Specific Provisions) Page 14, Policy 1.8**

**2. My submission is that:** I oppose this as it is stated. Where an expiring consent has allowed for development that has been planned but not yet undertaken, it is unreasonable to limit the amount of water to that which has actually been taken and used under the previous consent.

**3. (Seek the following decisions from ECan)** To allow for such planned development in the new consent so long as the amount of water is not more than that allocated in the earlier one.

**C) 1. (Specific Provisions) Page 14, Policy 1.10(b) + Page 18 Rule 2.2 (i)(b) + (ii)(b)**

Relates to the minimum flow for existing A blocks when takes are changed to frost fighting or storage.

**2. My submission is that:** I oppose this policy and the rules. These regulations discourage storage and the use of water for frost fighting, which is counter-productive and unfair. Some people have put in small amounts of storage to help during periods of low flow restrictions and this will penalise them. Raising the minimum flow for both activities would require putting in larger storage than would otherwise be the case.

**3. (Seek the following decisions from ECan)** Delete these rules and references to frost and A block storage on P21.

**D) 1. (Specific Provisions) Page 16, Policy 3.5 + Page 17 Explanation**

**2. My submission is that:** I oppose these provisions. The imposition of partial restrictions is inconsistent with objective 5 on page 12, which I agree with. ECan has had 6 or more years to investigate the pros and cons of this topic and it is unreasonable to prolong uncertainty for consent holders.

**3. (Seek the following decisions from ECan)** I request the removal of the subject of partial restrictions (ie delete the section on partial restrictions on pages 16 + 17)

**E) 1. (Specific Provisions) Page 17, Policy 3.8**

**2. My submission is that:** I oppose this. Limiting the duration of new and replacement consents is unreasonable, especially given the likely accelerated time frame for decisions on this plan now ECan council has been dismissed. Applications for resource consents are time consuming, expensive and stressful and should not be made more frequent.

**3. (Seek the following decisions from ECan)** To allow the duration of new consents to be determined by the RMA's and ECan's existing rules. Therefore remove policy 3.8.

**F) 1. (Specific Provisions) P 20 Lower Waipara**

AA Block takes of 20 l/s is mentioned but does not state point of uptake. This proposed new take was discussed with current consent holders with ECan and agreed this would be below their points of abstraction.

**2. My submission is that:** I support this but only if it is specified that the point of abstraction is below current abstractors.

**3. (Seek the following decisions from ECan)** Specify clearly what point of abstraction for future community water supply is below current existing takes.

**G) 1. (Specific Provisions) Pages 20 and 21. Table 1 Minimum flows**

**2. My submission is that:** A huge amount of work has been put into establishing what are the appropriate minimum flows and I strongly support those outlined in Table 1.

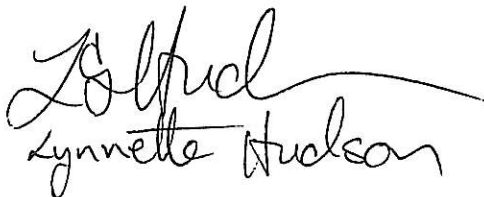
**3. (Seek the following decisions from ECan)** Retain the minimum flows shown in Table 1

**H) 1. (Specific Provisions) Page 16, Policy 3. Transfers.**

**2. My submission is that:** I generally strongly support the policy of transfers which will enable a sensible use of a limited resource. The total ban on surface water transfers between sub-catchments is, however, too rigid and allowance should be made to permit transfer of up to 3L/sec between these zones. This amount is so small it would produce little significant difference to the flows. None-the-less, it is sufficient to be useful for irrigation.

**3. (Seek the following decisions from ECan)** To endorse policy 3 with the addition that up to 3L/sec be allowed to be transferred between sub-catchments.

**Signed By:**

  
Synnëtte Hudson

**Date:**

11/6/2010