

EC 206782  
 TRM C14C/195774  
 SubID: 56687

v2 pLWRP-44  
 Plan/Hind/IP/6SU/2



## Submission on Proposed Variation 2 to the Proposed Canterbury Land and Water Regional Plan

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EC 206782

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

Return your signed submission by 5.00pm Friday 24 October 2014 to:

Freepost 1201 Variation 2 to pLWRP  
 Environment Canterbury  
 P O Box 345  
 Christchurch 8140

Full Name: CRAIG FLEMING Phone (Hm): (03) 3037004  
 Organisation\*: ASHBURTON HINDS DRAINAGE RATING DISTRICT LIASON COMMITTEE Phone (Wk): \_\_\_\_\_  
 \* the organisation that this submission is made on behalf of  
 Postal Address: 17 TAPRAS ROAD, RD3 ASHBURTON Phone (Cell): 0274 380 937  
 Postcode: 7773  
 Email: Flemingfamily@farmside.co.nz Fax: \_\_\_\_\_  
 Contact name and postal address for service of person making submission (if different from above): \_\_\_\_\_

### Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

- I could not gain an advantage in trade competition through this submission; or
- I could gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:

- I am directly affected by an effect of the subject matter of the submission
- I am not directly affected by an effect of the subject matter of the submission

Signature: [Signature] Date: 17/10/14

(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.

<input type="checkbox"/>	I do not wish to be heard in support of my submission; or
<input checked="" type="checkbox"/>	I do wish to be heard in support of my submission; and if so,
<input checked="" type="checkbox"/>	I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing



## **Ashburton Hinds Drainage Rating District Liaison Committee**

The groundwater levels in the drainage district have fallen due to loss of border dyke recharge and increased use of groundwater takes. The drainage area south of the Hinds River has seen its groundwater levels reduced due to the impact of loss of border dyke recharge while the area north of the Hinds River has been affected by the increase in groundwater abstractions.

The change to spray irrigation from border dyke irrigation has led to groundwater levels falling back to where they were prior to the commencement of border dyke irrigation. This has resulted in improved farming practices in the drainage district over the last ten years that has enabled farming activities, such as sowing and harvesting, to be carried out on time, rather than having to wait for suitable dry ground conditions.

While MAR could prove to be the answer for reducing groundwater nitrate levels, farmers on the heavier, less draining soils of the drainage district are concerned that MAR will reproduce high groundwater levels restricting normal farming practices. The landowners in the drainage district would prefer drain flows were raised by Targeted Stream Augmentation, rather than by MAR. We believe that by using the lowest nitrate water available to supplement a specific drain the chances of lowering nitrate levels in the drain would be greatly enhanced.

For many farmers in the drainage district, drain water is their only source of irrigation water. Many of these farms have tried accessing groundwater through well drilling only to find none, or be severely restricted by sand amongst the gravels.

Some changes need to be made to the proposed variation 2 provisions that would enable the key outcomes of stream flow and nitrate levels listed in the zone plan to be achieved.

13.4.9 d: We are concerned with the use of MAR as a source to increase drain flows, and what effect the potentially elevated groundwater levels will have on our farms.

13.4.10: What drains are referred to in this section

13.4.14: We are concerned with the proposed use of MAR as a means to increase drain flows, and how in (f) the adverse effects on people and property from raised groundwater levels will be judged.

13.4.16: We oppose this provision as it doesn't allow for some farms to access water off farm by using the drains as a means of conduit.

13.4.19: We believe that the minimum flow and allocation limits, as listed in table 13(e) should continue until there is a collaborative agreement achieved on individual drains by the Working Drains Party.

13.5.31 (1): We believe this policy should read: The groundwater take shall be used on the same property as the existing resource consent and there is no increase in the proposed annual volume; and



**13.5.36 (4): We oppose this as too restrictive for well placement and discharge that have no adverse effects.**

**13.5.36 (5): We believe irrigation needs to be added as a purpose.**

**Schedule 24a-Farm Practices (b) Winter grazing of intensively farmed livestock (ii): We oppose the 3m vegetative strip rule as there are many instances where alternative practices are effective in preventing nutrients and soil from entering waterways.**

**Schedule 24a-Farm Practices (b) Cultivation (iii): We oppose the 3m uncultivated strip required rule as there are many instances where other alternative practices are effective in preventing soil from entering waterways.**

## Hinds Drainage Scheme History

- 1867-1870 Direct cut made to sea by use of horses, scoops, and shovels for a distance of 6.4km
- 1870-1884 Open drains were formed as extensive areas were still too wet some into the Hinds river, the majority direct to the sea via existing coastal gullies. By 1884, 150 miles of drains had been dug.
- 1884-1903 Tile drains system was enacted to soak up seepage water that was interrupting or completely preventing arable operations. By 1900, 150 miles of tile drains had been laid.
  
- 1935-1945 Lack of maintenance on the scheme led to drains becoming clogged and weed infested causing an increasing area of water-logged ground.
- The lower 27km of the Hinds river also had become choked with willows causing over flows above Maronan road affecting some 14000 ha during floods.
- Production in the area during this period fell 50%
- 1939 Alarm amongst farmers in the area over the water logging led them to petition the Ashburton County Council to declare a drainage district for the purpose of undertaking drainage work.
  
- 1944 Drainage district declared by council, 3 rating areas determined
- 1945 Control of scheme passes to South Canterbury Catchment Board
  
- Scheme managed by Ecan area engineer Daniel Harrison
- Yearly maintenance budget approximately \$225,000/ year
- Maintenance includes mechanical cleaning, spraying, rebattering, silt/ shingle/ tree removal, spoil removal, drop structure and hayman protection etc.
- Reserves of half a years expenditure is kept in case of damage to infrastructure during exceptional flood or storm events.

DM

TRIM - C14C/197235-02  
EC - 152660  
SubID -

V2 plwkp-

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**From:** Jolene Oldman  
**Sent:** Friday, 24 October 2014 4:20 p.m.  
**To:** Mailroom Mailbox  
**Cc:** 'flemingfamily@farmside.co.nz'  
**Subject:** Ashburton Hinds Drainage Committee - Hinds submission  
  
**Categories:** Orange Category

EC336136

Hi mailroom

I have been contacted by Craig Fleming who is the Chairman of the Ashburton Hinds Drainage Committee. He explained that he has already submitted on the Hinds Plan on behalf of the Rating District but would like to add some points to his submission and can't do it personally because he is overseas at the moment. I have record his request below and he asked that I submit this on his behalf. I have cc'd him in to this email, so if required he can be contacted to confirm this request when he returns early next week.

**Additional points:**

**Section 13.5, page 10, Rule 13.5.27 (excavation of find sediment for habitat restoration) – Oppose: Support subject to recommended amendments**

**Request:** We seek the inclusion of an additional condition to this rule that requires written permission is obtained from the organisation responsible (TA/CRC) for the flood/drainage management of the waterway. We ask that the activity shall only be classified as Restricted-Discretionary if this condition is met.

We also seek the addition of a matter of restricted discretion to allow for consideration on 'the effects on erosion, bank stability and waterway capacity' as these are key effects on the environment and neighbouring land owners that could occur following excavation in a waterway.

**Reason:** This will align the LWRP with the protection afforded to the Drainage Network under the CRC Flood Protection and Drainage Bylaw. Many drains/waterways in the Hinds Catchment are CRC managed assets under the Bylaw and this inclusion would ensure that any proposed works under this rule will not adversely affect the community managed drainage network. Consideration should also be given to adding a note under any activity rule that will not be deemed as fully discretionary that separate authority is required under the Bylaw. All permission requirements need to be made clear to potential applicants as otherwise it can be confusing.

**Section 13.5, page 12, Rule 13.5.36 (discharge associated with augmentation) – Oppose: Support subject to the recommended amendments**

**Request:** We seek the inclusion of an additional condition that requires that written permission is obtained from the organisation responsible (TA/CRC) for the flood/drainage management of the waterway. We ask that the activity shall only be classified as Restricted-Discretionary if this condition is met.

**Reason:** A focus of the Ashburton Hind Drainage Rating Committee is to ensure that the drains maintain their drainage function. This inclusion provides certainty that the effects of any augmentation on the drainage function can be carefully considered.

Kind regards  
Jolene

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Jolene Oldman

Engineering Planning & Advisory Officer  
Rivers, Parks and Survey  
027 706 5332

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