

## Morag Hamilton

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**From:** Herb Familton <hfamilton@doc.govt.nz>  
**Sent:** Friday, 30 January 2015 3:40 p.m.  
**To:** Mailroom Mailbox  
**Cc:** 'Andrew Curtis (acurtis@irrigationnz.co.nz)'; Ian Mackenzie (akaunui@clear.net.nz); Laura Hull; lhume@fedfarm.org.nz; Sue Ruston (sue.ruston@fonterra.com); 'Lucy Johnson (Lucy.Johnson@synlait.com)'; Sally Jones; Chris Coulter  
**Subject:** TRIM: DOCDM-1550729 - Hinds Variation 2 further submission 23-08-2013  
**Attachments:** DOCDM-1550729 - Hinds Variation 2 further submission 23-08-2013.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**HP TRIM Record Number:** C15C/10735

Enclosed is the DG Submission On Variation 2 Hinds/Hekeao.

I have cc 'd relevant submitters by way of service as per Schedule 1 section 8 A RMA.

Herb Familton  
RMA Planner

South Island RMA Shared Services  
Policy and Regulatory Group  
Department of Conservation | *Te Papa Atawhai*  
Phone: 03 371 3751 | VPN 25 5451 | 027 2906025  
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Department of Conservation  
*Te Papa Atawhai*

DOCDM-1550729

30 January 2015

Sarah Drummond  
Plan Administration  
Environment Canterbury  
P O Box 345  
CHRISTCHURCH 8140

Dear Sarah,

**Further Submission on Proposed Variation 2 Land and Water Plan – Hinds/ Hekeao**

Please find enclosed a copy of the Department of Conservation's (DOC) further submission in respect of Proposed Plan Variation 2 Hinds/ Hekeao.

If you have any further questions, please contact me at – 03 371 3751 / hfamilyton@doc.govt.nz

Yours sincerely

A handwritten signature in black ink, appearing to read 'Herb Familyton'.

Herb Familyton  
**RMA Planner**

Department of Conservation *Te Papa Atawhai*  
Christchurch Shared Services  
Private Bag 4715, Christchurch Mail Centre, Christchurch 8140, New Zealand  
[www.doc.govt.nz](http://www.doc.govt.nz)

**RESOURCE MANAGEMENT ACT 1991**

**FORM 6**

**FURTHER SUBMISSION IN SUPPORT OR OPPOSITION TO, SUBMISSION ON PUBLICLY NOTIFIED PROPOSED PLAN VARIATION 2 – HINDS / HEKEAO ECAN LAND AND WATER PLAN**

Clause 8 of Schedule 1, Resource Management Act 1991

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**TO:** Environment Canterbury

**FURTHER SUBMISSIONS ON:** Plan Variation 2, Land and Water Plan

**NAME:** Director General of Conservation

**ADDRESS:** Planning and Permissions (RMA Group)  
Department of Conservation  
Private Bag 4715  
Christchurch 8140

**CONTACT PERSON:** Herb Familton

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**STATEMENT OF SUBMISSION BY THE DIRECTOR GENERAL OF CONSERVATION**

This is a further submission in support of (or in opposition to) a submission on Proposed Plan Variation 2 (Hinds / Hekeao) Land and Water Plan.

I, Sally Jones, Conservation Partnerships Manager (South Canterbury) of the Department of Conservation, acting under delegated authority from the Director General of Conservation, make the following further submissions in support or opposition to the submissions on Proposed Plan Variation 2.

1. **I support or oppose the submissions of** those persons and/ or organisations listed in the second column headed "Submitter Name" of the table in the attached.
2. **The particular parts of the submission I support or oppose are** identified in the third column headed "Submission".
3. **The reasons for my support or opposition are** set out under the fifth column headed "Reasons" of the table.
4. **The particular aspect of the Plan that the further submission relates to are:** set out in the first column headed "Plan Reference".
5. **In relation to those submissions I support I seek that that submission is allowed.**
6. **In relation to those submissions I oppose I seek that the part of the submission I oppose is disallowed.**

7. I do wish to be heard in support of this submission.
8. If others make similar submissions I will consider presenting a joint case with them at the hearing.

Dated at Twizel , this 30th day of January 2015



Sally Jones  
Conservation Partnerships Manager,  
South Canterbury District  
Acting pursuant to delegated authority

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18 - 32 Manners Street, Wellington 6011

**Address for service:**  
RMA Shared Services  
Department of Conservation  
Private Bag 4715  
Christchurch Mail Centre 8140  
Attn: Herb Familton  
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Phone: 03 3713751

PLAN REFERENCE	SUBMITTER NAME	SUBMISSION	SUPPORT/ OPPOSE	REASONS
<b>Variation 2</b>				
Policy 13.4.6	Irrigation New Zealand	V2 ptWRP-172 52278	Oppose	<p>Surrendered water should not be reallocated as it will exacerbate existing over-allocation. This would be inconsistent with Part II of the Act, the NPS Freshwater, the CWMS, and the Land and Water Plan.</p> <p>One exception could be made in this Policy 13.4.6 “unless the surrendered water is transferred to groundwater and used for targeted stream augmentation”.</p> <p>Support the inclusion of targeted stream augmentation in the Policy, especially in subsection d)</p>
Policy 13.4.9	Irrigation New Zealand	V2 ptWRP-171 52278	Support in Part	
Policy 13.4.14	Fonterra Co-operative Group Limited	V2 ptWRP-780 52333 54491	Support	Support inclusion of “enhancing in-stream habitat” as it gives effect to Part II of the Act and supports targeted stream augmentation and Director General Original submission point 3.9 new method 13.5.38
Policy 13.4.16	Synlait Milk Ltd	V2 ptWRP-236 54491	Support in Part	Support the reasonable use based on “existing” irrigated areas and rates as it will better enable targeted stream augmentation rather than ones calculated under method 1 in Schedule 10, which will be insufficient for targeted stream augmentation purposes.
Policy 13.4.16	Federated Farmers Combined Canterbury Branch	V2 ptWRP-295 51457	Support in Part	Support the qualifier “unless there is an environmental benefit in doing so”, as it will enable targeted stream augmentation.
Policy 13.4.18	Eiffelton Community Group Community Irrigation Scheme Inc	V2 ptWRP-1040 56799	Support in part	Support the development of a collaboratively developed replacement to table 13 to allow the effects of managed aquifer recharge and targeted stream augmentation to be fully assessed and a subsequently appropriate flow and allocation regime.

PLAN REFERENCE	SUBMITTER NAME	SUBMISSION	SUPPORT/ OPPOSE	REASONS
Rule 13.5.31	Eiffelton Community Group Community Irrigation Scheme Inc	V2 ptWRP-1103 56798	Support in part	<p>Agree that this rule could be amended to allow transfer of surface water to groundwater.</p> <p>Specifically, this rule should specifically provide for a condition 13.5.31. 2 (New condition):</p> <p>“2. The groundwater take permit is transferred to a community irrigation scheme so that ground water take permit can be abstracted and discharged to surface water downstream for targeted stream augmentation and to supply irrigation water to points downstream.”</p>
Rule 13.5.32	Federated Farmers Combined Canterbury Branch	V2 ptWRP-353 51457	Support in Part	<p>Support an exemption for transfers of groundwater to enable targeted stream augmentation and to supply irrigation water to points downstream as sought in proposed Director-General’s submission on rule 13.5.31 new condition 2 .</p> <p>This could be worded “unless transferred in accordance with 13.5.31.2.” at the end of the rule.</p>
Rule 13.5.33	Federated Farmers Combined Canterbury Branch	V2 ptWRP-354 51457	Support in Part	<p>Support an exemption for transfers of groundwater to enable targeted stream augmentation and to supply irrigation water to points downstream as sought in proposed Director- General’s submission on rule 13.5.31 new condition 2.</p> <p>This could be worded “unless transferred in accordance with 13.5.31.2.” at the end of the rule.</p>