
From: Georgina Hamilton <georgina.hamilton@tp.co.nz>
Sent: Friday, 30 January 2015 4:44 p.m.
Subject: V2 pLWRP - Further submission by Valetta Irrigation Limited
Attachments: VIL Further submission on Variation 2 PLWRP.pdf

EC305318
EC339425

Dear Sir/Madam

Please find **attached** a further submission by Valetta Irrigation Limited on Variation 2 to the proposed Canterbury Land and Water Regional Plan.

Kind regards,

Georgina Hamilton | Associate



We have merged with Tavendale and Partners Limited effective 1 October 2014. Please note my email address has changed to georgina.hamilton@tp.co.nz. All other details remain the same.

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**FURTHER SUBMISSION IN SUPPORT OF, OR OPPOSITION TO, A SUBMISSION ON
VARIATION 2 TO THE PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN**

Clause 8 of the First Schedule, Resource Management Act 1991

TO: Environment Canterbury
Freepost 1201
Variation 2 to the Proposed Canterbury Land and Water Regional Plan

By email: mailroom@ecan.govt.nz

Name of Further Submitter: Valetta Irrigation Limited (**VIL**)

1 This is a further submission in support of a primary submission on:

Proposed Variation 2 to the Proposed Canterbury Land and Water Regional Plan – Section 13 Ashburton (**Variation 2**).

2 Status of Further Submitter:

2.1 VIL has an interest in Variation 2 that is greater than the general public has because it made a primary submission on Variation 2 and operates the Valetta Irrigation Scheme (**Scheme**), which lies within the Hinds/Hekeao Plains Area to which Variation 2 relates.

3 Primary submission that this further submission supports:

3.1 This further submission supports aspects of VIL's primary submission on Variation 2 (Submitter ID 56723) and seeks to clarify aspects of that primary submission.

4 Particular aspects of VIL's primary submission that this further submission supports:

4.1 VIL supports the aspects of its primary submission relating to the provisions of Variation 2 concerning the Valetta Groundwater Allocation Zone (**Valetta GAZ**) (at paragraphs 20 to 24 of its primary submission).

5 Reasons for VIL's support are:

5.1 The amendments proposed under Variation 2 to Table 14: Ashburton Groundwater Limits¹ relate only to the A allocation limit for the Mayfield-Hinds Groundwater Allocation Zone (**Mayfield-Hinds GAZ**). Variation 2 seeks to maintain the existing allocation limits for the Valetta GAZ.

5.2 As set out in its primary submission on Variation 2 (at paragraph 23.4), VIL wishes to increase the allocation limit for the Valetta GAZ.

5.3 The following aspects of VIL's primary submission are affected by this further submission:

¹ Which is proposed to be renamed 'Table 13(f): Ashburton Section Groundwater Limits/Targets' under Variation 2.

- 5.3.1 VIL's opposition to the provisions in Variation 2 that reduce groundwater allocation limits in the Valetta GAZ (at paragraph 21 of VIL's original submission).
- 5.3.2 The reasons for VIL's opposition to those provisions (at paragraphs 23.1 and 23.2 of VIL's original submission).
- 5.3.3 VIL's request for the following relief (at paragraph 24.4 of VIL's original submission):²

"Delete the changes in Table 13(f) so the A allocation limit is increased up to the level at which environmental outcomes for water quantity can be achieved and water availability maximised. This level is at least 148 (million m³/yr) but may be more."

- 5.4 VIL's intention was that Variation 2 provide for an increase in the allocation limit for the Valetta GAZ consistent with the environmental outcomes sought in its primary submission, particularly in respect of water quality, through amendments to Table 13(f). The following amended relief more accurately reflects that intention:

"Delete the changes in Amend Table 13(f) so the A allocation limit is increased up to the level at which environmental outcomes for water quality can be achieved and water availability maximised. This level is at least 148 (million m³/yr) for the Mayfield-Hinds Groundwater Allocation Zone and 96.6 (million m³/yr) for the Valetta Groundwater Allocation Zone but may be more."

- 5.5 As set out in its primary submission, VIL considers that a higher allocation limit for the Valetta GAZ is more appropriate to give effect to the objectives of the Proposed Land and Water Regional Plan.³

6 Decision sought by VIL:

- 6.1 VIL seeks the following decision:

- 6.1.1 That the relief sought at paragraph 24.4 of VIL's primary submission (Submission Point ID V2 pLWRP-686), as amended in the manner set out below to reflect VIL's intention to provide an increase in the allocation limit for the Valetta GAZ, be accepted:⁴

"Delete the changes in Amend Table 13(f) so the A allocation limit is increased up to the level at which environmental outcomes for water quality can be achieved and water availability maximised. This level is at least 148 (million m³/yr) for the Mayfield-Hinds Groundwater Allocation Zone and 96.6 (million m³/yr) for the Valetta Groundwater Allocation Zone but may be more."

² Environment Canterbury Submission Point ID V2 pLWRP-686.

³ At para 23.4 of VIL's original submission.

⁴ Amendments shown in tracked changes.

7 **VIL wishes to be heard in support of its further submission:**

7.1 If others make a similar submission, VIL would consider presenting a joint case with them at any hearing.

Dated this 30th day of January 2015



T W Evatt / G C Hamilton
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