BEFORE INDEPENDENT HEARING COMMISSIONERS

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Proposed Variation 1 (Selwyn-Te Waihora) to the Proposed Canterbury Land and Water Regional Plan

MEMORANDUM OF COUNSEL FOR DUNSANDEL GROUNDWATER USERS ASSOCIATION INCORPORATED AND IRRIGATION NEW ZEALAND INCORPORATED

Dated: 4th November 2014
MEMORANDUM OF COUNSEL FOR DUNSANDEL GROUNDWATER USERS ASSOCIATION INC AND IRRIGATION NEW ZEALAND

1 The purpose of this Memorandum is to provide the Commissioners with:

1.1 a list of references referred to in the Statement of Evidence of Ian McIndoe on behalf of Irrigation New Zealand Incorporated and Dunsandel Groundwater Users Association Incorporated; and

1.2 confirm the reference to "14%" in paragraph 47(c) of the Statement of Evidence of Andrew Robert Curtis on Behalf of Irrigation New Zealand Incorporated dated 29 August 2014.

2 Mr McIndoe refers to the following sources:

2.1 Clark, D. 2012: Cumulative allocation in the Selwyn Catchment; Internal memorandum, Environment Canterbury dated 1st October 2012, 12 p


2.5 Morgan, M. Bidwell, J., Bright, J., McIndoe, I. and Robb, C. 2002: Canterbury Strategic Water Study. Lincoln Environmental Report No 4557/1, Lincoln University, New Zealand.


3 Mr McIndoe did not refer to any sources in his Rebuttal Evidence.
Mr Curtis has reviewed his notes again and confirms the reference to "14%". He notes that the overall levels of reduction expected on top of GMP varied between 12.5% and 14% depending upon what version of the Look Up Table was in use. The level of reduction is 12.5% in the ZIP addendum but this then increased to 14% due to an update in the modelling process.

Dated this 4th day of November 2014

A C Limmer / C J McCallum