

**BEFORE THE INDEPENDENT COMMISSIONERS**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the proposed Variation 2 of the  
Proposed Canterbury Land and Water Regional Plan,  
Section 13, Ashburton

---

**STATEMENT OF REBUTTAL EVIDENCE OF SRI SAMANTHA DEWI HALL  
ON BEHALF OF ASHBURTON DISTRICT COUNCIL**

Dated 29 MAY 2015

---



## **Qualifications and Experience**

1. My full name is Sri Samantha Dewi Hall. I have over 18 years' experience in planning and resource management.
2. I hold a Master of Science (Hons.) in Geography from the University of Canterbury and a Diploma in Business in Human Resources Management from the Christchurch Polytechnic, Institute of Technology.
3. I am a Principal Environmental Consultant with Opus International Consultants Ltd and have held this role since February 2012. In my current role, I am predominantly involved in the resource management of water related projects.
4. Prior to this, I worked for the London Borough of Lambeth, United Kingdom, as a Senior Planner between 2006 and 2011, and in various planning roles for Environment Canterbury between 1996 and 2006.
5. In my role as a Consents Team Leader for Environment Canterbury, I had delegated authority to decide resource consent applications, particularly for water permits and land use consents.

## **Expert Witnesses Code of Conduct**

6. I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note. This evidence has been prepared in accordance with it and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

## **Scope of Evidence**

7. Ashburton District Council (Council) made submissions in opposition to the following proposed rules in Variation 2 of the Proposed Canterbury Land and Water Regional Plan:
  - Rule 13.5.31
  - Rule 13.5.33
  - Rule 13.5.34
8. The S42A report proposes changes to the wording of the above rules which do not meet the outcomes sought by the Council.
9. The Hearing Commissioners' Questions on the S42A report at para. 10.226, questions whether the report addresses the Council's submission summarised at 10.222.
10. In accordance with Council's submission, the S42A report does not address the Council's concerns.

11. The Council has been working towards a strategy to rationalise the stockwater network across the Ashburton district to meet both the objectives of the Ashburton Zone Implementation Programme (ZIP) and Policy 13.4.1. The Policy seeks that the Council reduces their surface water abstraction for stockwater use from the Ashburton River by 1 July 2023.
12. The proposed rules in Variation 2 will directly impact on Council's ability to meet the objectives of the Ashburton ZIP and Policy 13.4.1. Further, the proposed rules appear to conflict with Policy 13.4.5.
13. The water currently supplying the open race stockwater network has been identified as a potential resource to address catchment over-allocation of water. As currently proposed, the rules would compromise the Council's ability to return water to the Ashburton River.
14. The ability to transfer water permits is an essential part of Council's strategy to rationalise the stockwater network. Council is currently working with irrigation companies within the district to determine the logistics of handing over responsibility for provision of stockwater to those companies, and is negotiating commercial terms of such a transfer. The potential future delivery of the service being via a piped network.
15. With a number of irrigation schemes now having piped networks or considering piping, supplying stockwater through the schemes provides a significant opportunity to transfer water to the schemes. Such an approach would make an important contribution towards achieving regional regulatory objectives to reduce the impact of water abstractions on sensitive rivers.
16. The terms of the transfer proposed between Council and the irrigation schemes includes the stockwater required to service users within their command areas, plus an additional volume of water which could be used for irrigation. The latter would offset the schemes' costs to provide stockwater, so that the transfer was cost-neutral to the Council. Meetings have been held with the irrigation companies to determine what volumes would be required for this to proceed. An agreement has yet to be reached with discussions ongoing.
17. In general, the schemes have indicated they are positive to the consideration of the proposal, but stress that the volume of water to be transferred for irrigation use must be sufficient compensation to cover capital costs and maintenance for a stockwater service.
18. It is imperative that the Council is able to transfer the stockwater requirements as part of those arrangements together with additional water for irrigation use in consideration for the impact on the irrigation companies infrastructure and operation. If successful, these transfer arrangements may

yield significant volumes of surface water returned to the environment (i.e. no longer taken), at limited, or no cost to the community.

19. The rules as currently proposed would severely compromise Council's current strategy in relation to rationalisation of the network, and may ultimately reduce volumes that could potentially be made available in future for managed aquifer recharge initiatives.

#### **Decision Sought**

20. The Council requests that the rules be reworded such that the Council is exempt, to allow the Council the flexibility to meet the objectives of the Ashburton ZIP and Policy 13.4.1. In particular, it wishes to have the flexibility to transfer surface water to other users, to enable the taking of groundwater to substitute surface water and to allow a change in the use of water from stockwater to irrigation.

Sri Samantha Dewi Hall  
29 May 2015