

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO,
SUBMISSIONS ON THE PROPOSED NATIONAL POLICY STATEMENT
FOR FRESHWATER MANAGEMENT**

To: The Chairperson
Board of Inquiry
NPS for Freshwater Management
PO Box 10362
WELLINGTON 6143

Attn: Sefulu Sione
Executive Officer

Name of Submitter: Hurunui Water Project Limited (*HWPL*)

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1. This is a further submission in support of, or in opposition to, submissions on the Proposed National Policy Statement for Freshwater Management. Details of the further submission and relief sought from the Board of Inquiry (*the Board*) are contained in the attached table.
2. HWPL wishes to appear before the Board to speak to its submission.
3. HWPL would be prepared to consider presenting its submission in a joint case with others making a similar submission at any hearing.


Chris Hansen
Authorised Agent for the
Hurunui Water Project Limited

14 April 2009

FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSIONS ON THE PROPOSED NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT

1.0 Overview

The Hurunui Water Project Limited (*HWPL*) is a working group consisting with representation from Enterprise North Canterbury, the Hurunui Irrigation and Power Trust, Ngai Tahu Property, MainPower and the owner of Eskhead Station.

The HWPL has a particular interest in the Proposed National Policy Statement for Freshwater Management.

The HWPL is centered on an area of around 42,000 hectares in the Hurunui and Upper Waipara catchments in the Canterbury region. It is investigating the feasibility of setting up a water storage scheme for irrigation and hydro- generation in the Hurunui District. The Hurunui District has the potential to boost its productive capacity if a reliable irrigation scheme can be established. Currently, only a small proportion of the district is irrigated and very little of this has a secure supply. The project is investigating possibilities for a water storage scheme which would provide a secure water supply for the district's farmers and producers.

2.0 Further Submissions

Please refer to the table attached.

Number	Name of Submitter	Position	Submission Detail	HWPL's Submission	HWPL's Reason	Relief Sought by HWPL
General						
5	Environment Canterbury	Support In Part	<p>Environment Canterbury recognises that there are a number of important policy issues more appropriately addressed at the national level through a NPS. However, it is considered that the proposed NPS needs significant amendment to provide key policy tools and guidance needed by local authorities managing water resources.</p> <p>RELIEF SOUGHT Areas where additional guidance could assist local authorities include:</p> <ul style="list-style-type: none"> - integrated management of resources - ability for managing cumulative effects - explicit provision for a precautionary approach to freshwater management - additional tools to manage over-allocated freshwater resources 	Support in part	Agree in principal that additional guidance to assist local authorities would be useful.	Accept relief sought by submitter as listed.
8	Mackenzie District Council	Support In Part	<p>Notable values are not identified, and there is not clear guidance on how local authorities should manage outstanding freshwater resources. Council roles unclear.</p> <p>RELIEF SOUGHT Clearly outline the different roles and responsibilities of regional and territorial authorities to avoid duplication.</p>	Support	Agree that different roles and responsibilities of regional and territorial authorities need to be outlined.	Accept relief sought by submitter.
11	Local Government New Zealand	Support In Part	<p>The principle of 'first come first serves' applied to water take applications,</p>	Support	Agree priorities being made for the users of water are necessary.	Accept relief sought by submitter.

Number	Name of Submitter	Position	Submission Detail	HWPL's Submission	HWPL's Reason	Relief Sought by HWPL
			<p>regional councils should be able to establish priorities for water use, with domestic and municipal water supply having priority over all other uses. The National Policy Statement should give direction for prioritising uses.</p> <p>RELIEF SOUGHT:</p> <p>- Add new Policy 12 as follows: "(b) Regional councils may, in their regional plans, identify priorities for other uses (subject to appropriate water conservation and demand management) and adopt objectives, policies and methods for the purposes of establishing those priorities, taking into account the following considerations: (i) The availability of water to meet the reasonably foreseeable domestic and municipal water supply requirements of individuals and communities and animal drinking water requirements. (ii) Sufficient water to meet instream requirements during periods of water shortage (iii) The assimilative capacity of water bodies (v) Maintenance of the benefits derived from the generation of renewable energy."</p>			
11	Local Government New Zealand	Support In Part	<p>RELIEF SOUGHT Central government guidance is requested on: - circumstances in which central</p>	Support	Agree with the central government guidance suggested.	Accept relief sought by submitter.

Number	Name of Submitter	Position	Submission Detail	HWPL's Submission	HWPL's Reason	Relief Sought by HWPL
			<p>government will submit on key projects</p> <ul style="list-style-type: none"> - circumstances in which central government will use call-in power - funding for the cleanup of waterbodies - circumstances in which NES will be developed - circumstance in which changes to the RMA will be made 			
11	Local Government New Zealand	Support In Part	<p>Need to provide certainty over how to determine outstanding freshwater resources.</p> <p>RELIEF SOUGHT</p> <p>Add new policy 6 as follows:</p> <p>"(a) Regional councils shall identify the outstanding freshwater resources in the region, and the values associated with those freshwater resources, in their regional plan.</p> <p>(b) Outstanding freshwater resources shall be identified by reference to the following criteria:</p> <p>(i) The presence of significant indigenous vegetation and/or significant habitats or indigenous fauna; (ii) The presence or association of the freshwater resource with areas of outstanding natural character; (iii) Whether the freshwater resource have quality and/or quantity (levels or flows) characteristics that make the freshwater resource outstanding for economic or social (including recreational) values; (iv) Whether the freshwater resource is of significance to tangata whenua; (v) Whether the freshwater</p>	Oppose	Oppose the relief sought, particularly the criteria to determine 'outstanding freshwater resources' used the term 'significant' with no reference to whether such significance is national, regional or local.	Oppose the relief sought and seek that NPS be retained in its current form, or that the relief sought be reworded to ensure a national significance is reflected.

Number	Name of Submitter	Position	Submission Detail	HWPL's Submission	HWPL's Reason	Relief Sought by HWPL
26	Christchurch City Council	Support In Part	<p>resource is a principal source of water to aquifers/lakes/estuaries/wetlands</p> <p>(c) Regional councils shall adopt policies and methods (in addition to the policies and methods identified in Policy 10) for the purposes of protecting outstanding freshwater resources in the region."</p> <p>There is little guidance on how to manage demand conflicts, and policies generally reiterate the RMA.</p> <p>RELIEF SOUGHT</p> <p>Establish a hierarchy of uses, defining which freshwater value are important to the 'well-being' of current and future generations, embedding a 'precautionary approach' to the consumptive use of freshwater, and/or directing regional council's to refuse consents that breach allocation limits set for freshwater resources.</p>	Support in part	Agree need for guidance on how to manage demand conflicts and establishing a hierarchy of uses.	Accept relief sought by submitter.
37	Clark, Walter C.	Support In Part	<p>The submitter states that due to inadequacies of the RMA, namely the 'first come: first served' basis, and 35 year permits, huge problems are now faced in determining priorities in water allocation.</p> <p>RELIEF SOUGHT</p> <p>- That the policy produced by the Board shall contain specific requirements relating to the taking and use of water, and any resource consents issued to take water shall also specify conditions relating to the discharge of water into the environment.</p>	Oppose In part/Support in part	Disagree that 35 year permits have caused huge problems determining priorities in water allocation; Agree priorities being made for the users of water are necessary.	Accept relief sought by submitter.