

3 May 2016

Otago Regional Council
Private Bag 1954
Dunedin 9054



Attention: Tom DePelsemaeker

Dear Tom

re **PROPOSED PLAN CHANGE 5A: LCG LEGAL SUBMISSIONS**

1 Please find **enclosed** Legal Submissions on behalf of the Lindis Catchment Group.

Yours faithfully

WEBB FARRY

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IN THE MATTER

Of the Resource Management Act 1991

AND

IN THE MATTER

Of Proposed Plan Change 5A (Lindis: Integrated Water Management) to the Regional Plan: Water for Otago

FOR SUBMITTER

THE LINDIS CATCHMENT GROUP

LEGAL SUBMISSIONS

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LEGAL SUBMISSIONS

Introduction

- 1 Proposed Plan 5A document ("PC5A") and the section 32 report both introduce the plan change for the 'Lindis: Integrated Water Management' as:
 - Setting a management regime (allocation limits and minimum flow) for surface water and connected ground water in the Lindis Catchment;
 - Setting maximum allocation limits for specified Aquifers within the Bendigo Tarras Basin (Ardgour Valley, Bendigo, and lower Tarras Aquifers);
 - Mapping the minimum flow catchment boundaries and monitoring site associated with the Lindis River in the B-Series of the Water Plan Maps; and
 - Mapping the boundaries of the Bendigo-Tarras Basin Aquifers and amending the boundaries of the Lindis Alluvial Ribbon Aquifer and the C-Series of the Water Plan Maps.

- 2 The Section 42A Report introduces the overall approach of PC5A as proposing:

"An integrated approach to the management of the ground water and surface water resources of the Lindis Catchment and the ground water of the Bendigo-Tarras Basin, recognising the hydraulic connections between these water bodies and the inter-dependence of the values and ecosystems they support."

- 3 Against the background of current water use, which is heavily reliant on water rights provided in mining privileges, the introduction of the management regime has catchment wide consequences for all water users. The plan change has a wide focus, setting a new, more restrictive, integrated water management regime for water use across the Lindis catchment.

Consultation Process

- 4 The extent of impact of the proposed changes was recognised by Council and a lengthy consultation process undertaken with water users and the wider community. Six workshops were held over five years and a series of more focussed meetings including a think tank were held to review the options for water management. All were very well attended.

- 5 Over a series of workshops from 2010-2014 and in the consultation draft of PC5A dated April 2014 the Schedule 2A maps showing the Lindis catchment followed the natural catchment boundaries. In 2015, three months before notification of PC5A an artificial line excluding the Tarras Creek area was drawn on the Schedule 2A maps to be included by PC5A.

The ambit of Plan Change 5A

- 6 The starting point for studying the ambit of PC5A is considering the extent of change from the current management regime to the proposed new management regime. The second step is to consider the scope of matters raised in submissions, and then subsequently a check may be performed to ensure that certain submissions are 'on' the plan change to ensure they can be adopted without prejudice.

Decisions on submissions

- 7 In *Countdown Properties (Northlands) Limited v Dunedin City Council (1994)* NZRMA 145 the full Court concluded that in deciding whether a plan amendment was properly made:

"The local authority or tribunal must consider whether any amendment made to the Plan Change as notified goes beyond what is reasonably and fairly raised in submissions on the Plan Change."

- 8 It is submitted that the proposals, to include Tarras Creek area in the B series maps, and the transitional arrangements proposed to tailor a specific management response for the Lindis catchment, as reviewed in Mr Logan's advice to the Otago Regional Council, are fairly and reasonably raised in the submission of LCG and other submitters.

- 9 In *Royal Forest and Bird Protection Society v Southland District Council [1997]* NZRMA 408 (HC) Justice Panckhurst stated:

"The process of public notification, submissions, and hearing before the Council is quite involved. Issues commonly emerge as a result of the participation of diverse interests and the thinking in relation to such issues frequently evolves in the light of competing arguments. Thereafter the Council must determine whether changes to the Plan are appropriate in response to the public's contribution. Against this background it is important that the assessment of whether any amendment was reasonably and fairly raised in the course of submissions, should be approached in a realistic workable fashion rather than from the perspective of legal nicety."

- 10 In that case the High Court found that taking a realistic approach and applying the “fairly and reasonably” test enabled an amendment to a provision in a separate section of the plan, which had not been amended in the notified form of the plan change. The Court found that the relevant amendment represented the best method of addressing an issue raised in a submission, and of fitting the proposal introduced by the plan change into the framework of existing plan provisions.
- 11 It is submitted that this case law requires a realistic approach to be taken confirming the new management regime for the Lindis, to respond to the issues raised in submissions and also to ensure it fits with the existing policy framework in the RPW.

Submissions ‘on’ a plan change

- 12 There is a check on how far a submission may go in seeking relief that may over extend the subject matter of a plan change. The “Clearwater test” (as it has become known in subsequent case law) provides a principle to carry out this check if required.

The Clearwater test

- 13 The test is set out in the High Court decision *Clearwater Resort Limited v Christchurch City Council* (High Court Christchurch AP 34/02 14 March 2003). This case considered a variation to a proposed plan which amended the wording of a single policy. That policy relied on a noise contour line which restricted residential development near the Christchurch Airport. The ambit of the variation was limited in that it only amended the policy and not the noise contour line. The Court’s comments regarding a variation can also be applied to a proposed plan change.
- 14 On the Court’s preferred approach it found:
- “1 *A submission can only be fairly regarded as “on” a variation if it is addressed to the extent to which the variation changes the pre-existing status quo.*
- 2 *But if the effect of regarding a submission as “on” a variation would be to permit a planning instrument to be appreciably amended without real opportunity for participation by those potentially effected, this is a*

powerful consideration against any argument that the submission is truly “on” the variation.”¹

15 In respect of the first consideration, the Court in Clearwater rejected a literal interpretation which might suggest only the wording contained in the plan change document were open for challenge. Instead the first inquiry is to closely consider the extent to which the variation changes the pre-existing status quo. The Court considers this general evaluation is in conformity with the scheme of the Resource Management Act 1991, which obviously contemplates a progressive and orderly resolution of issues associated with the development of proposed plans.²

16 The Court preferred a pragmatic approach to the subject matter of a plan change. The purpose of the inquiry should be directed towards finding a practical resolution of the substantive issues that the plan change is seeking to address in shifting from the status quo.

17 Clearly for a plan change with a wide ranging impact that inquiry will necessarily have a wider ambit than a plan change seeking to resolve a narrow issue.

18 In respect of the second consideration an important comment is made by the High Court in the Clearwater decision at paragraph 69:

“It is common for a submission on a variation or proposed plan to suggest that the particular issue in question be addressed in a way entirely different from that envisaged by the local authority. It may be that the process of submissions and cross-submissions will be sufficient to ensure that all those likely to be effected by or interested in the alternative methods suggested in the submission have an opportunity to participate. In a situation, however, where the proposition advanced by the submitter can be regarded as coming out of “left field” there may be little or no real scope for public participation. Where this is the situation, it is appropriate to be cautious before concluding that the submission (to the extent to which it proposes something completely novel) is “on” the variation.”³

19 It is submitted that the second Clearwater test is predominantly directed to submissions which seek the adoption of an unexpected and completely novel proposal. A novel proposal that is not obviously within the subject matter of the plan change could result in a member of the public being prejudiced by its

¹ *Clearwater Resort Limited v Christchurch City Council* para 66

² *Ibid* para 68

³ *Ibid* para 69, following *Halswater Holdings v Selwyn District Council* (1999) 5 ELRNZ 192

adoption, because they could not have expected it to come within the ambit of the relevant plan change.

Subsequent case law

- 20 Subsequent case law applying the Clearwater test has considered the Clearwater test almost solely in respect of land use activities managed by territorial authorities. There is no case law which considers the Clearwater test in respect of provisions to manage water allocations. It is submitted that these cases dealing with narrow changes to rules governing land use activities cannot be directly applied to the circumstances of PC5A.
- 21 A land resource is more directly defined than a water resource. A water resource can only be defined by its catchment. A catchment is a much larger unit with complex ecological and hydraulic connections.
- 22 This subsequent case law also solely deals with small scale changes to territorial plans. For example, in *Palmerston North City Council v Motor Machinists* [2014] NZRMA 519 the High Court considered a submission which focused on the rezoning of two residential lots with a total land area of 1,619 m².
- 23 In the majority of these cases the submitters were seeking to a new spot zone or to extend a zone to enable land uses that provided more profitable development opportunities.
- 24 It is noted that in *Palmerston North City Council v Motor Machinists*⁴ the Court suggests one way of analysing the first limb of the Clearwater test is to ask whether the management regime in a District Plan for a particular resource is altered by the plan change.
- 25 In respect of PC5A the water resource is the whole of the Lindis catchment. LCG has submitted that the natural catchment is the Freshwater Management Unit for the purposes of analysis and assessment under the National Policy Statement. This plan change has a broad focus and the issues it must address encompass a large resource with imprecise edges and complex environmental, cultural, social and economic matters.
- 26 Unless a relevant submission could be said to be unexpected, or 'left field' then the inquiry as to whether a member of the public could be prejudiced by its adoption is unnecessary.

⁴ Para 91(d)

Tarras creek

The existing management regime

27 The Regional Plan: Water ("RPW") provisions governing current water use in the Lindis refer to the catchment as a whole. This is an important point for the initial inquiry as to the extent that PC5A changes the status quo..

28 Policy 6.4.2 is amended by PC5A. It sets the primary allocation for water takes from the Lindis river, providing:

To define the primary allocation limit for each catchment, from which surface water takes and connected groundwater takes may be granted, as the greater of:

(a) That specified in Schedule 2A, but where no limit is specified in Schedule 2A, 50% of the 7-day mean annual low flow;

(b) The sum of consented maximum instantaneous, or consented 7-day, takes of:

(i) Surface water as at:

(1) 19 February 2005 in the Welcome Creek catchment; or

(2) 7 July 2000 in the Waianakarua catchment; or

(3) 28 February 1998 in any other catchment; and

(ii) Connected groundwater as at 10 April 2010

29 The Lindis catchment is not currently subject to minimum flows. It therefore presently comes within the ambit of Policy 6.4.4:

For existing takes outside Schedule 2A catchments, minimum flows, for the purpose of restricting primary allocation takes of water, will be determined after investigations have established the appropriate minimum flows in accordance with Method 15.9.1.3. The new minimum flows will be added to Schedule 2A by a plan change and subsequently will be applied to existing takes in accordance with Policy 6.4.5(d).

30 Both these policies which are at issue in PC5A refer to the 'catchment'. Catchment is not defined in the RPW nor the Resource Management Act 1991. At present then, this rule can be understood by applying the natural

meaning of 'catchment', which is the Lindis catchment defined by its natural boundaries, including the Tarras creek area.

- 31 The current water management regime in these and other RPW provisions apply to the Lindis catchment as it is defined by its natural boundaries. The status quo is that the Lindis catchment includes the Tarras creek area.
- 32 The change proposed by PC5A in the B series maps suggests a new definition of the Lindis catchment which excludes the Tarras area.
- 33 The starting point for considering the ambit of the plan change is set between these two approaches.
- 34 There are many other provisions in the RPW that refer to the catchment. Issue 6.2.5 and the related Objective 6.3.5 and Policy 6.4.5 deal with transfers of water between catchments. It is submitted that for consistency the Lindis catchment should be defined in the B series maps in line with its natural meaning to ensure consistency of interpretation across the plan.

Submissions

- 35 A wide range of submissions were made on PC5A. Several submissions, including by the Lindis Catchment Group ("LCG") seek that the B-series maps containing the artificial line excluding the Tarras creek area are rejected and the natural catchment boundaries shown. The Lindis Irrigation Group ("LIC") also submitted on this issue. LIC represents all the water users taking water from the existing water race network.
- 36 Specifically in relation to the Tarras creek area, the Tarras water race delivers water to water users in the Tarras Creek area. The LIC owns and operates this water race. Water users who obtain water from this race are members of LIC. They are all also members of LCG.
- 37 The members of these groups are the majority of water users in the Lindis catchment. Membership lists for both entities are provided with these submissions.
- 38 Members make regular contributions to group costs. For LCG members these contributions have been applied to the substantial costs of preparing the LCG proposal and expert evidence in support of this proposal for the hearing of PC5A.
- 39 It is submitted that the advice given to Mr Logan was incorrect. Water users across the catchment are fully aware of the impact of PC5A on their water.

This plan change has a substantial impact and consequences for water users. All have been aware of and involved in the process for six years.

- 40 The question for any person in deciding whether to make a submission is whether they wish to have a say on the proposed new management regime and on relief sought by other submitters. If they elect not to make a submission then they have turned down the opportunity to be involved and must accept any logical management regime which is reached through the plan change process.

Evidential basis for inclusion

- 41 The Tarras Creek area has obtained its water through races originating high in the Lindis catchment for more than fifty years. Exclusion of the Tarras Creek area is artificial for practical, historical and cultural reasons. It does not reflect the long term connections that farmers in the Lindis have with the Tarras Creek area. Submitters gave evidence that families based in the catchment share a school and are together one community.
- 42 The Tarras Creek area has strong links with the Lindis catchment. Water is provided to water users through the LIC races at present. It is submitted that these water users would expect to be the subject to the same rules and regulations as water users elsewhere in the natural Lindis catchment.
- 43 The effect of the artificial line excluding the Tarras Creek area is that the consenting processes for water users in this area differ from the regime applicable to water users within the mapped Lindis catchment. This results in a more complex process to obtain a new consent, and will increase costs in an area where farmers are already under considerable pressure. If it is uneconomic for the Tarras Creek area water users to renew their water consents then this could jeopardise the planned group water management scheme.
- 44 If it was the intent of the Council in drawing this artificial line to encourage water users in this area to rely on aquifers in preference to Lindis River water, evidence has been heard that this is not possible because the ground conditions mean that effective bores cannot be sunk to access these water sources.

Summary

- 45 The present management regime in the RPW follows the lines of the natural boundaries of the catchment, which incorporates the Tarras Creek area. The

artificial exclusion of the Tarras Creek area for the purposes of applying certain rules of the RPW is illogical and unjustified. The Tarras creek area has practical, cultural and historical links with the Lindis catchment which would result in its separate treatment being awkward and could create misunderstandings and inconsistencies. Retention of the natural boundaries of the catchment on the B series maps will also support the water sharing approach that will facilitate the best environmental outcome for the catchment, and provide corresponding cultural and social benefits.

- 46 This is not an unexpected or left field proposal. It is an approach that was taken by the Council for five years prior to the notification of PC5A. It is a logical submission and also ensures consistency of interpretation of the Lindis 'catchment' across the RPW.

Transitional Arrangements

- 47 The proposed transitional arrangements are intended to address effects and consequences of the new management regime as they have been demonstrated in evidence as being specifically pertinent in the Lindis catchment. The transitional arrangements enable the intent of the plan change to be achieved at the same time as preventing significant adverse effects on the community and water users who are being called on to accept substantial limits on their access to reliable water in the future.
- 48 In his advice to the Otago Regional Council regarding the proposed Transitional Arrangements Mr Logan considers the majority of the proposed provisions are 'on' PC5A and therefore the relief sought by LCG may be adopted by the Committee.
- 49 Mr Logan notes in his advice that he provides a tentative view as he does not have a full understanding of the substantive issues before the Committee or of the evidence heard.⁵ It is submitted that the two provisions which he is not clear are sufficiently 'on' the plan change respond to specific substantive issues and the Committee will therefore be in a better position to appreciate that they are not unexpected or 'left field' proposals in the context of the evidence they have heard.
- 50 Moreover, the proposed transitional provisions are intended to apply and implement the wider policy directions contained in the RPW. For example, new policy 4 is intended to support and facilitate the type of group water management promoted by Policy 6.4.0B of the RPW.

⁵ Paras 50 and 52, advice dated 20 April 2016, Proposed Plan Change 5A – Transitional Arrangements
SMC-475558-4-201-V3:SMC

Evidential basis for inclusion

- 51 Evidence was heard by the Committee that in order to deal with the new management regime required by the imposition of minimum flows and also as a result of the impending expiry of mining privileges, water users in the Lindis Catchment (including Tarras water users) were working towards a group water sharing scheme best method to ensure that the races are disestablished and water takes moved downstream to the optimal location.
- 52 Evidence also showed that the positive effects of shifting the water takes and providing for a water sharing framework provided substantial beneficial effects, including environmental, cultural, social and recreational benefits. This context is important for consideration of PC5A. The transitional arrangements proposed by LCG are provisions that seek to facilitate the process of change to this new scheme and also to address effects and consequences of the new management regime proposed by PC5A.
- 53 The following rules and policies are proposed to deal with the specific consequences of this plan change. The provisions are not intended to extend beyond the Lindis catchment and the water sources practically and economically available to these water users.
- 54 The specific provisions are reviewed in the order proposed in Ms Dicey's evidence.
- 55 New policy 1 is addressed to the timeframe within which minimum flows are implemented. As noted by Mr Logan it is within the ambit of the plan change and no person could be prejudiced by its adoption.
- 56 New policy 2 excludes the application of residual flows to the Lindis River and has clear links to the minimum flows to be imposed by PC5A. As noted by Mr Logan it is within the ambit of the plan change and no person could be prejudiced by its adoption.
- 57 Mr Logan also considers that new policy 3 is within the ambit of the plan change and no person could be prejudiced by its adoption. Evidence at the hearing showed that there will be substantial beneficial effects resulting from the decommissioning of the water races and shifting of takes downstream. In the light of this evidence this new policy is clearly understood to be within the ambit of the plan change and its general aim to improve the Lindis River environment.

- 58 New policy 4 is also better understood in the light of evidence provided by submitters. The LCG submission seeks a tailored response to the circumstances of the Lindis catchment and a holistic package of provisions for river management. Proposed new policy 4 provides for and recognises that water is currently managed in races owned and operated by LIC. Future use of water following the implementation of minimum flows and expiry of mining privileges requires new water sharing arrangements to be found.
- 59 Water users across the catchment are seeking a plan provision that will assist with and facilitate a group water sharing approach in the future. This policy will provide more flexibility and better enable the group water sharing approach to be formulated, consented and built. It also furthers the existing aims of the RPW to encourage group water use as recorded in Policy 6.4.0B of the RPW.
- 60 It is submitted the support for new policy 4 can be found in the issues considered in evidence as directly responding to the aims and consequences of PC5A. The policy is within its ambit of the plan change and given the water is currently group managed a policy supporting a new group management approach is not 'left field' and would not prejudice any person.
- 61 New Rule 1 provides for water takes from the Clutha. Because the Council has sought to encourage water takes from sources other than the Lindis River, and evidence has been provided to show that the aquifers are impractical alternatives options, this rule seeks to enable the only other realistic alternative source available to water users in the lower Lindis. The parties affected by this rule lodged submissions, have been fully involved in this process and had full notice of LCG's submission and evidence presented at the hearing.
- 62 New Rules 2 and 3 address the activity status of primary allocation takes from the Lindis River which is clearly a matter within the ambit of the plan change. These rules provide for a specific activity classification within the proposed new water management regime and as noted by Mr Logan are within the ambit of the plan change and no person could be prejudiced by their inclusion.
- 63 A new rule is also proposed to enable limited channel management works. This is not a gravel extraction rule. It is intended to provide opportunities to enable connectivity of the water flows in the lower Lindis. The Committee heard evidence that connectivity was an important issue for Iwi and also that connectivity will provide better fish passage as sought by Fish and Game.
- 64 The channel management works are proposed to shift gravel accumulations in that block water channels. These works would be limited in scope and only

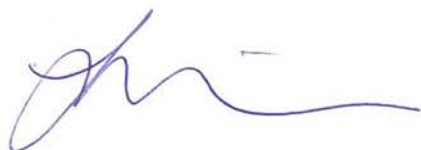
undertaken where necessary. It is not proposed that the gravel would be extracted, simply that it would be moved to enable connectivity.

Conclusion

- 65 Every water user is interested in PC5A which introduces new rules governing their use of water. This is a plan change with a broad impact for businesses reliant on water. It is a plan change with a wide ambit, across the whole of the Lindis catchment and community.
- 66 The plan change process must find a sensible solution for moving forward. The case law supports a pragmatic approach. The final form of even the simplest plan change is rarely confirmed exactly in the same form as it was originally notified.
- 67 A comprehensive range of submissions were made on PC5A. LCG represents almost all of the water users in the catchment and the Committee also heard from many of the water users in person. The Committee can be confident that the community has been fully involved in this process.
- 68 In order to facilitate the optimal future outcome in environmental, cultural, social and recreational terms, LCG's proposal seeks that the same consenting regime is applied to the whole of the natural Lindis catchment.
- 69 LCG's proposal also seeks specific provisions to provide certainty for water users and facilitate a future water sharing approach. Provisions are also proposed to deal with specific environmental issues in the Lindis, such as the huge gravel shifts which occur periodically.
- 70 Until the parameters of the new management regime are finalised work cannot begin on a new water sharing scheme and applications cannot be made to shift the water takes. These steps are necessary in order to provide the extensive environmental, cultural and social benefits anticipated from the decommissioning of the water races.
- 71 It is only matters which could be described as 'unexpected' that the Committee needs to consider further in determining whether there may be a prejudicial effect in accepting a submission. There are no unusual or 'left field' proposals put forward by LCG.
- 72 The provisions proposed by LCG, including the mapping of the Lindis catchment along its natural boundaries, provide an effective and appropriate management of the water resource across the Lindis catchment and are fully

within the ambit of PC5A. There would be no prejudicial effect from their adoption by the Committee.

Dated at Dunedin this 2nd day of May 2016



S M Chadwick

Counsel for Lindis Catchment Group

LCG MEMBERSHIP LISTING

FULL MEMBERSHIP	COST	# MEMBERS
ASSOCIATE MEMBERSHIP	\$75 GST Incl	20
	\$25 GST Incl	4

CONTACT NAME	TRADING NAME / PROPERTY	MEMBERSHIP
Bruce Jolly	Ardgour Family Trust	FULL
John Perriam	Begg Race	FULL
Jayne Rive	Cloudy Peaks	FULL
David Emmerson	Forrest Range	FULL
Matt & Jo McCaughan	Geordie Hill Station Limited	FULL
Pete Jolly	Kotiti	FULL
Rebecca & Gus Chapman-Cohen	Lindis Downs Limited	FULL
Lindis Irrigation Company	Lindis Irrigation Limited	FULL
Tim Davis	Longacre Station	FULL
Adam & Anna Spiers	Merryland & Lindis Crossing etc	FULL
Gordon & Spin Lucas	Nine Mile Pastoral Ltd	FULL
Terry Cooke	Shepherd Creek	FULL
Alastair Rutherford	The Point Partnership	FULL
Sam Lucas	Timburn Station	FULL
Lesley Purvis	Cluden Station	FULL
Mark Davidson	Lindis Crossing Limited	FULL
Beau & Ann Travathan	Lindisvale	FULL
Robbie Gibson	Malvern Downs	FULL
Michael Hayman	Pukemara	FULL
Alistair Madill		FULL
Graeme Martin	Independent Chairman	ASSOCIATE
Brett O'Sullivan		ASSOCIATE
Justin Willson		ASSOCIATE
Michael Stroud		ASSOCIATE

Lindis Irrigation Company

ShareholderName1	ShareholderID	Type
Malvern Downs Limited	86	Irrigation
Mr PW Jolly	84	Irrigation
Maryland Tarras Ltd		Irrigation
Mr NG Trevathan	98	Irrigation
D P Nyhon Holdings Ltd	85	Irrigation
D P Nyhon Holdings Ltd	121	Irrigation
Cluden Station	74	Irrigation
Lindis Crossing Ltd	179	Irrigation
Mr BDS Jolly	72	Irrigation
Mr PHJ Parcell	89	Irrigation
T J Cooke	117	Irrigation
Spiers Holding Ltd		Irrigation
Mr AA Rutherford & Mrs SE Rutherford	93	Irrigation
E Whittleston	99	Irrigation
Wainui Pastoral Ltd		Irrigation
Cloudy Peak Pastoral Ltd	195	Irrigation
T J & J Cooke	180	Irrigation
The Michael & Felicity Hayman Family Trust	80	Irrigation
A & J Statham	188	Irrigation
Dry Creek Enterprises Limited	82	Irrigation
Mark Davidson	76	Irrigation
A Madill	127	Minimum
Kent Mcelrea	183	Minimum
Grant Henderson	184	Minimum
Peter Gibbons	185	Minimum
GM & CJ Williams	186	Minimum
Ardgour Adventures	187	Minimum
Ambrose Bisschops	196	Minimum
Frank Avis	189	Minimum
Tarras Golf Club	96	Irrigation
M Stroud/T Dennison	122	Minimum
W Pilgrim,L Miller, Polson Higgs,	181	Minimum
Jarrard Cowie	190	Minimum
R J Johnston	182	Piped
Read/Halsgrave	95	Irrigation
P J Beauchamp	70	Irrigation