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**Further Submission in Support of Submission on Publicly Notified Proposed Policy Statement
or Regional Plan under Clause 8 of Schedule 1 of the Resource Management Act 1991**

To: Proposed Canterbury Land and Water Regional Plan
 Environment Canterbury
 P O Box 345
 Christchurch 8140

EMAIL: mailroom@ecan.govt.nz

Name of submitter: Rangitata Water Limited
 C/- Rooney Earthmoving Limited
 P O Box 2159
 Timaru 7940

Attention: Gary Rooney
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 Email: Gary.Rooney@rooneygroup.co.nz

1. This is a further submission in support of submissions on Proposed Canterbury Land and Water Plan by Rangitata Water Limited ("RWL").
2. RWL has an interest greater than the public generally as it is an entity directly involved in irrigation in the Canterbury Region and the Policies and Rules submitted on in the identified submissions directly affect RWL and its operations. RWL is currently constructing a significant scheme between Arundel and the coast. The scheme will harvest flood waters from the Rangitata River, store and reticulate the water for farmland irrigation over a command area of approximately 30,000 hectares. As a result of receiving access to water, the RWL shareholders are investing significant capital in the development of farmland in the region. The RWL irrigation scheme is playing a critical role in the future economic and social well-being of the local communities and surrounding towns. It also provides a more sustainable future irrigation water supply in an area that is currently considered as a red zone in the Canterbury Natural Resources Regional Plan.
3. RWL wishes to be heard in support of their submission and would consider presenting this further submission in a joint case with others making a similar submission at any hearing.
4. RWL supports the submission of:
 - a. MainPower New Zealand Limited
 P O Box 346
 RANGIORA 7440
 Submission Number: 164

5. RWL supports the submission of MainPower New Zealand Limited ("MP") in its entirety, with particular regard to submission 1 on Policy 4.68, titled 'Efficient Use of Water and Sharing of Water.

6. Policy 4.68 limits the ability to grant additional or back up water permits. The policy is:

Water allocated to a consent holder for abstraction, but which is not used over the time period specified in the water permit, is not further allocated through the granting of an additional or back-up water permit.

7. RWL agrees with the submission of MP that policy 4.68 will restrict the efficient use of water in Canterbury and we further submit that a negative outcome of the policy is that it does not enable the full potential associated with the sharing of allocated water to be realised.

The effect of the allocation water that is already part of a consented allocation but is not being used by the original consent holder has already been considered when determining whether the allocation regime will adversely affect the environmental regime.

RWL submits that the outcome of the policy is that it does not provide for the full potential of consented water to be shared with another authorised party if it is not being used by the original consent holder.

To share the consented water elsewhere via other consented parties will have no negative environmental effects.

RWL supports the submission that providing for a greater sharing of water will better achieve the efficient and effective economic use of water in Canterbury.

8. RWL agrees with the relief sought by MP, this being:

b. delete Policy 4.68.



Rangitata Water Limited

14 November 2012

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 Environment Canterbury
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