

Name of submitter: Rangitata Water Limited

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18th June 2013

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This is a further submission in support of submissions on Proposed Canterbury Land and Water Plan by Rangitata Water Limited ("RWL").

Experience

- 1 My name is Gerard Richardson; I have been employed by the Rooney Group as a Technical Manager & Project Manager since 2008.
- 2 I have 30 years experience in the civil construction industry throughout New Zealand, Australia and the UK working for both consultants and contractors.
- 3 The majority of my experience has been in the construction of water retaining structures –hydro, drinking water and irrigation dams as well as canals, water races and tailing dams.
- 4 At Rooney Group I assist our consulting division with investigating, scoping and pricing irrigation schemes and other civil projects. I also administer many of the Rooney Group consents required to build and construct our schemes and on-farm infrastructure.

Rangitata Water Limited Background

- 5 Rangitata Water Limited (RWL) is a wholly owned entity of Rooney Earthmoving Limited (REL) which itself is major part of The Rooney Group (TRG) of companies. RWL was created to develop, construct and fund the Rangitata South Project.
- 6 The Rooney Group has used other company entities to develop irrigation schemes in the past including the \$11 million, 6,600ha, 3.0m³/sec Acton irrigation scheme just South of Rakaia
- 7 RWL & REL has an interest greater than the public in general 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.
- 8 RWL is currently constructing a major irrigation scheme between Arundel and the South Canterbury coast. The scheme will harvest flood waters from the Rangitata River, store

and reticulate the water for farmland irrigation over an irrigated area of approximately 14,000ha out of a command area of approximately 30,000 hectares.

- 9 As a result of receiving access to water, RWL is investing around \$100 million in the development of the scheme and farmland in the region. The users of this water are also spending an equivalent amount of money on their on-farm irrigation systems.
- 10 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.

Submission Support

- 11 RWL supports the submission of MainPower (MP) New Zealand Limited, Submission Number: 164, in its entirety, with particular regard to submission 1 on Policy 4.68, titled 'Efficient Use of Water and Sharing of Water.'
- 12 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.
- 13 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.

RWL Submission on policy 4.68

- 14 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 that water is not being used by the original consent holder.
- 15 The effect of the allocated water that is already part of a consented allocation but is not being used by the original consent holder, has already been considered during the consent process when determining whether the allocation will adversely affect the environmental regime.
- 16 The transfer of water between two locations within one source body **should** be enabled by the plan.

A hypothetical example of the type of water sharing RWL envisage is as follows:

- Two irrigation schemes on the Rangitata River, Scheme A and Scheme B and both have consented takes from the Rangitata River.
- If scheme A is able to extract water under its consents but does not choose to then Scheme B should be able to utilise Scheme A's unused allocation providing that an agreement is in place between the consented schemes.
- The rationale here is that the total water volume available to the schemes has been allocated via consent and therefore the effects of the abstraction on the environment have also been considered and approved.

- 17 The effect on the river and its environs has been protected through the consenting process. We should not be concerned with **how** the water is being shared between consented parties.
- 18 RWL consider that the restriction that Policy 4.68 imposes on the use and sharing of water that has already been allocated to a consent holder for abstraction is, in itself a restriction on the efficient & effective use of the Canterbury water resource.
- 19 During the consenting process any existing consent(s) are considered before new consents are issued. During this consideration ECan assume 100% utilisation of the existing consents. The reality is that 100% utilisation is often not the case and there is considerable scope for un-used water to be effectively utilised elsewhere.
- 20 The process of issuing additional or backup consents does not need to be a difficult process as the assessment of effects on the environment has already occurred as part of the consenting process. The main thrust of the additional permit would revolve around record keeping between consents to ensure the correct allocation is fully complied with.
- 21 The **efficient** and **effective** use of the Canterbury water resources should mean that this type of water transfer is possible, and RWL believe the current consenting and assessment of effects on the environment process is sufficiently robust and thorough enough to enable this to occur, without further regulation.
- 22 RWL has a strong commitment to developing the Central South Island and we believe the management of water allocation is of major importance to the area. We believe that consented water that is un-used can be developed for use without over allocation increasing and with the correct management in place, the existing over- allocations can be reduced and eventually eliminated.
- 23 RWL submits that the ability to share the consented water elsewhere via other consented parties will have no negative environmental effects and will provide for a greater sharing of water that will better achieve the efficient and effective economic use of water in Canterbury.
- 24 RWL agrees with the relief sought by MP, this being: b. delete Policy 4.68.

RWL Submission on policy 4.75

- 25 This policy seeks to limit the period of time that resource consent holders have to enacted the consent. The policy states:
Resource consents to abstract water shall be given effect to within two years unless a longer let period is justified to give effect to the consent due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" requires the installation of infrastructure, water meter and use of the water is proposed.
- 26 RWL submits that the timeframe of two years for a consent holder to "give effect" to a consent is manifestly too short and there is no justification for this reduced period.
- 27 RWL's industry experience indicates that some large water abstraction schemes can take up to five years after consenting to have sufficient infrastructure developed to extract water. The two year period may mean that developers will have to create a special extraction of a portion of water just to meet the requirements of policy 4.75.

Special construction can be an expensive diversion to a normal construction programme and potentially cause time delays and cost overruns elsewhere on the project.

28 The Resource Management Act provides a standard period of five years to give effect to a resource consent and Policy 4.75 is not necessary to implement the objectives within this Plan and furthermore, it is adding an unnecessary layer of restriction to the consent process.

29 The submitter seeks the following relief: a. Delete Policy 4.75.

