

Make Submission

Consultee	mr grant miller (52170)
Email Address	grant.miller@xtra.co.nz
Address	State Highway 75 R.D.2 Christchurch 7672
Event Name	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Submission by	mr grant miller
Submission ID	V1pLWRP-93
Response Date	21/03/14 12:19 PM
Consultation Point	7. MANDATORY INFORMATION - HAVE YOUR SAY (View)
Status	Submitted
Submission Type	Letter
Version	0.2
To Be Heard	
Please select the appropriate option from the following:	I DO NOT wish to be heard in support of my submission; or
If so	

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Address	State Highway 75 R.D.2 Christchurch 7672
Event Name	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Submission by	mr grant miller
Submission ID	V1pLWRP-56
Response Date	20/03/14 10:45 PM
Consultation Point	Map 10 (View)
Status	Submitted
Submission Type	Web
Version	0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Support

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Whilst supporting the establishment of the Kaituna Groundwater allocation zone I request an amendment to add McQueens and Gebbies Valleys to this zone. Page 130 of section 32 report states "the new Kaituna Groundwater Allocation Zone is hydraulically isolated from the main gravel dominated plains aquifers". This is also true of the neighbouring McQueens and Gebbies Valleys where local experience has been of clay and volcanic type rock when sinking wells. Smiths Welldrilling Ltd who have drilled numerous wells in this vicinity support this position (written support held by me and can be forwarded to ecan when required). They state that the ground conditions are volcanic rock and clay not alluvial gravels. I have available spoil samples from the last well drilled in Mcqueens Valley which also supports McQueens and Gebbies being a part of the Hydraulically isolated deep volcanic aquifer Kaituna zone. A more logical boundary for this zone would be the old course of the Halswell river which also neatly ties in with the local authority boudaries.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

A change in the Kaituna groundwater allocation zone to include McQueens and Gebbies Valleys, with the new boundary being the old course of the Halswell river. This would also require a small increase in total allocation to allow for existing consent holders in McQueens and Gebbies Valleys plus the 10% allowed.

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Address	State Highway 75 R.D.2 Christchurch 7672
Event Name	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Submission by	mr grant miller
Submission ID	V1pLWRP-59
Response Date	20/03/14 11:34 PM
Consultation Point	Section 11 - Selwyn Waihora Section 11 - Selwyn Waihora (View)
Status	Submitted
Submission Type	Web
Version	0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

I oppose the prohibition of new takes in the Selwyn Waihora Zone and also the reduction in total volume. I oppose this for two reasons.

Firstly and in my mind most importantly Ecan has made no attempt to address the inequity of water allocation. The past history of first come first served has resulted in some landowners being unfairly disadvantaged. The implementation of new take prohibition in effect legislates landowners into either water winners or losers, with considerable financial disadvantage to the losers. To take the path of "well the horse has bolted we can't do anything about it" and "well thats just the way it is, bad luck" is morally wrong. As a part of implementation of this plan Ecan needs to address allocation of water in the Selwyn Waihora Zone. The option of buying a water consent is a very poor mechanism especially with the requirement to relinquish 50% back to Ecan. This will likely have the effect of doubling the cost of consent per cubic metre further compounding the inequity onto the non consent holder.

Secondly the operation of central plains water is likely to lead to increased levels of groundwater in the selwyn waihora zone. Whilst this is one of the goals of the plan a secondary consequence could be too much water in the selwyn waihora zone. The flexibility to issue consents where groundwater pumping could be advantageous to the environment should be considered.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

An amendment to the prohibition of new takes with a full review of equity of allocation of water. This review should have, but not be limited to, the following terms of reference: historical allocation models, current allocation levels, future sustainable allocation levels (including the effects of CPW), mechanisms for distribution of water consents (a range of models which should also include equitable redistribution of existing consents if current volume is at maximum level). The outcome of this review should be a process where non consent holders are able to access the right to use water at an equitable cost.

This issue is one that is fundamental to the plan but as yet has not been addressed in a way that has gathered support from the non consent holder community.