

## Gay Gibson

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**From:** Sheryl Rielly <srielly@eanetworks.co.nz>  
**Sent:** Friday, 24 October 2014 1:12 p.m.  
**Subject:** Submission  
**Attachments:** Submission on Variation 2.docx

Good afternoon,

Please see attached submission sent on behalf of John Tavendale.

Kind regards,  
Sheryl Rielly  
Accounts Officer



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## Environment Canterbury

### *Submission on variation 2 to the proposed Canterbury Land and Water Regional Plan – Section 13 Ashburton*

1. I support in principal the objection of Federated Farmers NZ to this plan.
2. I personally submit in regard to rule 13.5.32

“The tabling and use of groundwater that does not meet one or more of the conditions of Rule 13.5.31 is a prohibited activity”

The words “prohibited activity” often used in the variation report are draconian. Acceptable wording for 13.5.31 would be to replace the words “is a prohibited activity” with “requires a resource consent”.

This still allows Environment Canterbury not to grant a resource consent, but would allow landholders where there was a justifiable reason to apply for a resource consent.

By way of example, I am a shareholder in land where a simple boundary adjustment allows neighbours to water more efficiently using “centre pivot irrigation”. One neighbour will use the Mayfield Hinds Scheme Water, for a new pivot, the other would increase the area watered by an existing pivot by changing the centre points and extending the pivot length. However this requires increased capacity from an existing well to achieve the efficiencies which this boundary change achieves. This is a “prohibited activity” under the proposed variation.

I submit that as farmers within this district move to Spray Irrigation, many boundary adjustments will occur to achieve improved water efficiency. I submit that as a result many landowners will be restricted by clause 13.5.31 and will be unable to achieve these efficiencies.

I submit that the need to apply for a “Resource Consent” will be just as effective as a “Prohibited activity” in achieving the objectives of the plan.

3. I personally submit that the words “prohibited activity” be replaced with the words “requires a resource consent” within the proposed variation 2 to the proposed Canterbury Land and Water Regional Plan – Section 13 Ashburton.
4. I personally submit that the rules for the Upper Hinds Catchment are unduly restrictive. The limits imposed should be abolished and objectives as for the remainder of the catchment be established.

John Tavendale  
RD6  
Ashburton