

From: [Tony Howey](#)
To: [Mailroom Mailbox](#)
Cc: [Allister Todd](#); [Donald & Sandy Little](#); [Tom Denton](#)
Subject: Plan change 7 Submission
Date: Friday, 13 September 2019 3:23:14 PM
Attachments: [20190913163306530.pdf](#)

SUBMISSION ON PROPOSED PLAN CHANGE 7 TO THE CANTERBURY LAND AND WATER REGIONAL PLAN

Clause 5 First Schedule, Resource Management Act 1991

TO: Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

Environment Canterbury
PO Box 345
Christchurch 8140

By email: mailroom@ecan.govt.nz

Name of submitter:

1 Name: Meadowlinks Residents Ass
Address: 16 Meadowlinks Lane, RD 4, Timaru 7974
Contact: Tony Howey
Email: tony@viberi.co.nz

Trade competition statement:

2 I, Tony Howey, could not gain an advantage in trade competition through this submission.

Proposal this submission relates to is:

3 This submission is on proposed Plan Change 7 (PC7) to the Canterbury Land and Water Regional Plan (PC7).

Wish to be Heard:

4 I wish to be heard in support of this submission.

5 I would be prepared to consider presenting a joint case with others making similar submissions at the hearing.



Tony Howey

Date: 13 September 2019

Submitter: Tony Howey, Manager; Meadowlinks Residents Ass.

Background;

Meadowlinks is a small subdivision incorporating up to 13 homes, a walk way, a wetland area and a 12 hectare deer enclosure. In 2007 a consent was granted to take 7 litres per second to provide potable water to the 13 homes and to provide irrigation water to the deer enclosure and common areas. This consent was based on the current regime of a 30 day pump test to determine the stream depletion effect.

Submission

Bore Stream Depletion Effect on Existing bores

5.123 sets out the rules around the stream depletion effect but there is no mention in the plan that the way this will be measured for the OTOP area is fundamentally different to the current plan. While it's not mentioned in the plan, we understand that the existing pumping test regime of 30 days will change to 150 days. This will potentially make hundreds of existing bores redundant and irrigated properties being forced to reduce the groundwater take significantly or stop pumping altogether. Such a significant change should have been discussed with affected parties and an economic assessment be carried out based on the impacts to the individual farmers, community water users and to the region as a whole.

While there are separate provisions in the Plan for Community Water schemes, there is only one well for Meadowlinks Association for both potable water for the homes and the irrigation of the deer park, so we understand that our take would be caught by this new measurement regime putting into question the future of the well for both uses.

For the Opihi and the Opuha rivers, below the Dam, it could be well argued that this will make no difference to minimum flows as if there is any improvement in stream depletion as a result of these new rules then the releases from the Dam would simply account for these.

We seek the following decisions from Environment Canterbury: On the basis that the changes of this rule for the OTOP area have not been even mentioned in the plan, there has been no consultation with affected parties, there has been no analysis of either the hydraulic benefit or the economic hardship this rule change will have for this catchment area, we submit that the measurement regime should remain as per the current plan. This might be a consideration for a future plan change after engineering studies and consultation has occurred.