



# SUBMISSION FORM – Proposed Plan Change 7(Water Permits) to the Regional Plan: Water for Otago

Form 5, Clause 6 of Schedule 1, Resource Management Act 1991

Office use only

Full name of submitter: Mark Groundwater

Name of organisation (if applicable): Beggs Creek Station

Email: [Redacted]

Postal Address (or alternative method of contact):

Telephone: [Redacted]

**wish** /  **do not wish** (circle preference) to be heard in support of my further submission.

If others made a similar submission, I **will** consider presenting a joint case with them at a hearing.  
(Delete if you would not consider presenting a joint case)

**Trade competitor's declaration** (if applicable)  
I could /  could not (circle one) gain an advantage in trade competition from this submission

I am /  I am not (circle one) directly affected by an effect of the plan change that  
(a) Adversely affects the environment; and  
(b) Does not relate to trade competition or the effects of trade competition.

Signature of submitter: [Signature] Date: 1/5/20  
(Or person authorised to sign on behalf of person making submission.  
Signature not required if you make your submission by electronic means)

**Please note that all submissions are made available for public inspection.**

**State what your submission relates to and if you support, oppose, or want it amended:**  
(e.g. support rule 'x', or amend policy 'y')

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We oppose Plan Change 7 (PC7) completely and want it withdrawn.

The Otago Regional Council (ORC) can process water permit applications under their existing framework and do not need to establish an interim planning framework.

We have paid a considerable amount of money employing consultants to prepare our water permit application under the existing rules. Science reports have been included that have been backed up with fact based evidence. If the ORC goes ahead with PC7 all this work will have to be changed to meet these new proposals at more considerable cost, with no benefit to us or to the ORC.

The question has to be asked if we have had sufficient time to complete our application to renew our water permits why hasn't the ORC got systems in place to process them.

Over the 7 years we have owned our property we had listened to the ORC re using our water allocation efficiently. We therefore have invested considerable money in putting in fixed irrigation poles (we have considerable winds so discarded the idea of a pivot) the development was expensive and will take many years to recoup. If 6 yr permits are brought into force, as per attached email from our banker, we will not be able to meet the criteria to do any more infrastructure work. Once the ORC have 6 years in place what will the ORC plans be in the future for issuing permits. We need 25 yr permits in place so we can progress with our infrastructure plans for the farm. In 6 yr time, we would have to spend more money applying for permits – duplicating what we have already done. Bearing in mind this is a considerable cost to our operation. If for some reason we had to sell our property, these short term permits, would discount the price.

Our farm has extensive hill country and we need to have irrigated land to balance our farming operation.

We do not agree with limiting irrigation areas to be based on a single year.

Every year farming is different. Irrigation is dependant on the rainfall the area gets each year and at what time of the year this rain falls. The year 2017/18 was a drought year and irrigation water was not available even if we wanted it.

Efficiency of water usage should be the prime reason behind policy.

It is questionable with the take and volume limits in PC7 being based on years 2012 to 2017 while the irrigated area would be based on one solitary year.

The volume of water ORC is projecting to issue will be less than what we have used efficiently in the past. They have not been able to tell us why. Unreliable historical data is being proposed to be used when ORC staff have told us at public meetings that the data isn't any good. At a meeting at Omakau presentations were made and Pete Ravenscroft and Roddy Henderson both said the 2014-14 data was no good for modelling.

Over the summer our family uses the Manūherikia River a lot for swimming and fishing. We enjoy the family time there along with other locals from the community.

It appears the objective of PC7 will not be met. It is not promoting the transmission to long term management of water resources in Otago

## AP & BJ Groundwater

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**From:** "Craig Burns" <craig.burns@westpac.co.nz>  
**Date:** Thursday, 30 April 2020 3:24 p.m.  
**To:**  
**Subject:** Consent

Further to our discussion this morning my view on the proposed 6yr consent term for irrigation rights by ORC in a Banking context are as follows;

- This length of term is very short and does not provide the Bank with sufficient comfort that the capital cost of the development could be adequately funded over the term of the consent, hence it would be more difficult for customers to successfully source funding for an irrigation development project.
- If funding was successful the terms of the approval would be very difficult to meet given the Bank would require full repayment of the capital cost within the term of the consent, it is considered it would be very difficult for a farm operation to meet this repayment term given the capital cost could be upwards of \$1m which would therefore require minimum \$166,000k of debt repayment per annum.
- If the repayments cannot be made within the term of the consent the funding will not be considered by the Bank.

For this reason I would believe a minimum consent length of 25yrs would be required to allow the Bank to provide development funding for the industry.

Thanks Craig

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**Craig Burns**  
 Corporate Agribusiness Manager  
 Agribusiness

Tel: 03 2039237 (Ext:31037)  
 Mob: +64 27 4526005  
 Email: [craig.burns@westpac.co.nz](mailto:craig.burns@westpac.co.nz)

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 36 Mersey Street, Gore  
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30/04/2020