

[Redacted]

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**From:** Otago Regional Council <notifications@engagementhq.com>  
**Sent:** Thursday, 30 April 2020 5:47 pm  
**To:** [Redacted] Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water

Anonymous User just submitted the survey 'Submission Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water' with the responses below.

**Full name of submitter**

Roger Lane

**Name of organisation (if applicable)**

Blackstone Irrigation Company

**Email**

[Redacted]

**Postal Address (or alternative method of contact)**

[Redacted]

**Phone number**

[Redacted]

**Do you wish to be heard in support of your submission?**

*(Being 'heard' means speaking at a hearing)*

Yes

**If others have made a similar submission, would you consider presenting a joint case with them at a hearing?**

Yes

**Could you gain an advantage in trade competition from this submission?**

No

**Are you 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

I am

**State what your submission relates to and if you support, oppose, or want it amended:**

*(e.g. support rule 'x', or amend policy 'y')*

1. Our submission relates to the whole PC7. We oppose the whole of it. We would like PC7 declined

**State what decision you want the Otago Regional Council to make:**

*(e.g. amend policy 'y' to say....)*

2. As a group of 5 farming families who have been using water from the Manuherikia for household, stock water and irrigation for over 100 years we feel the ORC has got it all wrong with PC7. The existing framework for permit replacement that we had been working under if it was allowed to be completed is more than adequate and has better outcomes for the community. So we say keep the existing pathway  
3. Blackstone Irrigation would implore the ORC to continue the work on the allocation and minimum flows in the Manuherikia based on sound hydrological, ecological, cultural and social assessments. This is work that we and others in the community have been striving to complete up to now.

**Give reasons for the decision you want made:**

*(e.g. I want policy 'y' changed because...)*

4. Our group of Farmers have been working towards deemed permit replacement for over 10 years. This includes the investment of over \$6,000,000.00 in infrastructure for better ecological outcomes and efficiency gains. This has benefitted not only us but the community as a whole. We have also spent around \$50,000.00 directly on getting our application for permit replacement ready. PC7 would render that spend obsolete and require us to do it again 2x over to meet new rules and the old framework as well.  
5. The new rules in PC7 will make our permit replacement process exceptionally difficult and costly. Two things that PC7 was supposed to avoid. For example the granting of a 6 year water permit is untenable and will cause all future development to stall. Banks will not lend to projects that might take 2 years to complete and then only 4 years of life in a permit. Such projects might have big efficiency and environmental gains. Farms will become unsaleable. So we will be forced to apply for a non-complying activity consent.  
6. Another unworkable part of PC7 is that the irrigation area cannot be bigger than the area irrigated in 2017/18. It effectively hamstring us. This stops all future efficiency and environmental gains for no apparent reason. Again we will be forced to apply for a non-complying activity consent. Most of our farmer shareholders have made new developments [\$2,500,000] since 2017/18 under the existing ORC and RMA rules and now PC7 virtually makes us criminals. So again we have to apply for a non-complying activity consent.  
7. The PC7 approach to water data collation and analysis in determining future allocation has huge implications to us as individual farmers. Our analysis of the potential new rules are that we will lose 50% of our present consented allocation. This is unthinkable and will result in severe hardship. The data from 2012/17 is not a full data set. It doesn't take into account any technical glitches. The data set does not allow for wet years where we didn't use as much or dry years when we go on voluntary irrigation restrictions. The most recent years data should be used to reflect a more accurate picture. So again we have to try our luck in getting a non-complying activity consent.  
8. PC7 will for us five farming families result in a costly and convoluted process which is the exact opposite of its 'intent'.