

[Redacted]

From: Otago Regional Council <notifications@engagementhq.com>
Sent: Monday, 4 May 2020 3:50 pm
To: [Redacted]
Subject: Anonymous User completed Submission 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

Eric Grant Ludemann

Name of organisation (if applicable)

Challenge Farm Trusts Partnership

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?

No

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')

I Oppose the conditions relating to the 6 year term of consent as this does not allow enough time to make capital investment in efficient irrigation. I oppose the average allocation take over a 5 year period being the years 2012 to 2017, we purchased a farm with a consent in 2016 and it had poor utilisation of consent prior to 2016 under the previous ownership. We have spent considerable money on centre pivots and Variable Rate Irrigation and now face the risk that there will not be enough water to operate this infrastructure. It should be remembered the average amount of water used depends on the amount of rainfall received. Instead of the average of the 5 years being taken the maximum in one year should be used as the baseline, as this is the amount likely required in a dry year.

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

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

That consents are issued for a minimum of 20 years to reflect the investment in infrastructure. Also that instead of the average use, the maximum of the 5 year period be taken into account, or if a farm or consent has changed hands during that period of time then the highest amount used is taken as the baseline figure.

Give reasons for the decision you want made:

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

To allow economic decision making for capital expenditure especially related to improving irrigation efficiency and to maximise productive value of the assets post COVID-19.