

[Redacted]

From: Otago Regional Council <notifications@engagementhq.com>
Sent: Friday, 1 May 2020 2:47 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

Nick Davison

Name of organisation (if applicable)

Davison Agriculture Ltd

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 not

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

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

Davison Agriculture Ltd (DAL) is in the process of developing an application to replace a deemed permit that expire in 2021. DAL has been working on this issue in good faith in accordance with the terms of the existing Regional Plan: Water for Otago (RPW). DAL considers proposed Plan Change 7 to be unnecessary and that it is unreasonable for the Otago Regional Council to propose a new policy framework at this late stage with which our application will need to comply, and which will incur DAL significant additional cost. Policies The proposed Policy 10A.2.1(b) that there is no increase in the area under irrigation will result in no new agriculture, horticulture, and viticulture activity in the Company's command area. This will incur significant financial cost for a number of Pisa Irrigation Company shareholders who have plans at various stages of advancement to expand and diversify their farming activities. The proposed Policy 10A.2.1(e) that there is a reduction in the volume of water allocated for abstraction will require the company to reduce the water allocations of its members, the result of which will be that at key times of the growing cycle and particularly in dry years there will be insufficient water available for the successful production and finishing of their various crops. The proposed Policy 10A.2.2 that would limit new resource consents for the take and use of water to no more than six years will have potentially disastrous impacts on the economy and social life of the community in the Company's command area. The value of properties that rely on water from the Company will collapse as without secure access to water for irrigation, stock and household supply the land has minimal value. Investment to improve irrigation efficiency, which often has positive environmental flow-on effects, is generally not bankable with such a short surety of water supply. The proposed Policy would also mean the Company will have to incur significant additional expense when applying to renew its consents in six years time. Taken together the policies in the proposed Plan Change 7 will have the effect that land in the Company's command area and in the wider Central Otago district that could be made productive with access to irrigation will not be developed and existing activities may need to be curtailed. The negative economic and social costs of this for our Company and district are significant at a time when every effort needs to be made to support activities that will help our community overcome the impacts of the COVID 19 disaster. Rules The Pisa Irrigation Company opposes Rule 10A.3.1 because of the limit it imposes on the area of land able to be irrigated and the methodology that it is proposed be used to calculate the rate of take and volume of water. Our reasoning re limits on irrigable area is set out above. The methodology set out in Schedule 10A.4 we consider to be seriously flawed. Particular concerns included that rates of take and volume limits will be based on averages calculated over a period for which the Company does not have complete data,

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

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

DAL supports the relief sought in the Otago Water Resource Users Group submission, namely and in order of preference: Option 1: That PC7 is declined in its entirety. This is our preferred option Option 2: That PC7 is declined in its entirety, and amendments are made to existing policies and methods in the RPW. Option 3: That PC7 is declined in its entirety, and is replaced with: i Simple transitional objectives and policies ii Implemented by a permitted activity rule; and iii Supporting methods An explanation of each of these options is set out in the OWRUG submission

Give reasons for the decision you want made:

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

I want the decision to change to PC7 declined for all the reasons above in 11. I strongly believe the basis for this change to be tremendously inaccurate and will severely impact the district economically, socially and

environmentally . We are extremely fortunate to have a fantastic resource which can is and still can be managed to the benefit for the whole country. From my perspective I have improved my water efficiency by swapping from flood irrigation to overhead spray. This has enabled us to reduce leaching of nutrients and cover a larger area with the same amount of water. By changing to PC7 will greatly limit the ability to borrow money to become more efficient and new technology comes along. Gaining finance for improving water use needs to have a viable length of consent time to be viable.