

[Redacted]

From: Otago Regional Council <notifications@engagementhq.com>
Sent: Monday, 4 May 2020 3:36 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

Peter and Margaret Hore

Name of organisation (if applicable)

Glenshee Station Ltd, Cornaig Farms Ltd, Gidding Downs.

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 PC7 in its entirety. We oppose all of Plan Change 7. 2.Relief Sought: a. We ask that it be removed. b. We seek the urgent but robust completion of the limit setting plan change for the Manuherikia Catchment, including both a minimum flow and allocation limit, based on robust hydrology, ecology information, analysis of reliability of supply, and completed cultural and social impact assessments. This is a continuation of the existing work in the catchment prior to notification of PC7 3.We support and adopt the submission of the Otago Water Resources Users Group submission on Proposed Plan Change 7, including the reasons for that submission and the relief sought in that submission.

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

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

As above

Give reasons for the decision you want made:

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

We are sheep and beef farmers in the north of the Manuherikia catchment. We share a water permit from the Dunstan creek, a tributary of the Manuherkia. The ORC needs to stop moving the goal posts. Farmers are making business decisions all the time. For the last three years we had been preparing our permit applications under the current plan. We had also been making business and development decision under the current plan. We need to know we are making business decisions on information that is fair, robust and the planning framework generally consistent. In the case of our own family business Peter and I made an undertaking to get our irrigation water sorted for our adult children, we felt confident about attaining this goal until PPC7 was brought in. Our two sons are now farming in our business and are managing their properties with their young families with us as support. Successful succession planning is very important to us. We can not plan well for our future when the ORC is incapable of managing a wise regulatory framework for us to operate to. Our experience in replacing water permits with balanced environmental and cultural outcomes is substantial. Our original home farm is located in the Kyeburn Catchment. The Kyeburn catchment irrigators were issued 35years permits by commissioners in 2017 and the permits retained their as 35year term through an appeal to the Environment Court in 2018 2019. As a group we started by filling in the ORC's application forms (Form 4s) and over the following 15years developed it into a very comprehensive group (with sub groups) application with strong hydrology, ecology and community cooperation. Our replacement consents included the minimum and residual flows, adaptive management monitoring, freshwater species protection plan and proof of efficient use against the Aqualinc guidelines In return we got 35year permits. In 2009 we purchased Gidding Downs, which has a share of the Downs Irrigation Scheme that takes water from Dunstan Creek. We then became part of the Manuherikia Catchment. At this stage we were impressed how the catchment had managed and shared water at low flows with the amazing ability of their race manager who also worked on maintaining the minimum flow at Ophir. The community has come a long way and achieved so much. It concerns us that the ORC does not recognise the quality of: the hydrology, ecology, community consultation, sub catchments that work together to understand how each water scheme, creek and mainstem are the Catchment Group. There has been a lot of time and money spent in preparing the water permits applications. As advised by ORC the permits will be ready to lodge before the end of 2020 and they will include all the information currently required. Including addressing the National Policy Statement for Freshwater. It is completely unreasonable that all this information is wasted and we are issued with 6 or even 15 year terms. There has already been a lot of work done by the Manuherikia Catchment Community towards our application to renew water rights. We need to

be able to get on and make it work for the viability of families, farm and community. In good faith, we have the preparation done to put the application in to ORC. The rules keep changing. We understand the minimum flow and the need for residuals for the Community to manage the catchment. We do care about the health of our rivers, streams and creeks, our whole community. There are responsibilities that are part of a water right. The continual maintenance and improvements that are allowed for in farm budgets and loans when needed. It is a lifeline to our farms to winter proof and drought proof them in our harsh climate. Technology and machinery are key to this. With the technology of telemetry into remote and difficult sites it has allowed us to understand, manage and share the water with reference to the ORC flow sites. Manuherikia like Kyeburn have embraced this. For us we could see our flows on the computer for our Kyeburn (Glenshee Station) sites in 2012 and Dunstan Creek (Gidding Downs) in 2013. Size of irrigated areas are not constant across the years. They vary with seasons, types of crops, and as efficiency of use improves. Linking our consents to the area irrigated in one year back in 2017-2018 is a nonsense. We now talk of litres per sec (not heads) + telemetry, volume per year, water harvesting and storage. Our seasons dictate the litres per sec we take not the amount written on paper. The importance to us to have a 35year water right is demonstrated by our Kyeburn property, Glenshee Station. In our application we wrote “Improvements to the irrigation system have been ongoing since 1978. Pipe and K-line systems have been introduced, storage ponds for irrigation and stock water have been developed, as well as stock water troughs on the lower terraces. Further development is planned as there is an ongoing commitment to spray irrigation. Some contour irrigation will remain as it fits within the farm’s system and water availability profile. The continued development of dams is a crucial aspect of maximising the efficient use of water.” Now there are two new on farm dams (for water harvesting) and security of water for 2 new pivots. The bank was not prepared to loan money for irrigation improvements until we had the long term security of the water right. The dams mean we are able to leave the required residual flows and also handle the drop in surety of supply that will come with the introduction of the minimum flows. These on farm decisions and actions were made possible by clarity of processing by ORC, environmental gains and long term permits. We ask that ORC remove PC7. That a standard method for assessing water take data and efficiency of use that has been drafted by an irrigation expert be adopted. That will leave the Manuherikia Catchment water users to get on with the replacement of the permits with long terms. ORC should also stop wasting time with the Manuherikia minimum flow plan change and finally start to adhere to the timeframes they keep setting but then failing to meet.