

**Submission on Proposed Water Permits Plan Change (Plan Change 7)
to the Regional Plan: Water for Otago**

*(Form 5, Clause 6 of the First Schedule, Resource Management Act 1991 – Submission on Publicly
Notified Proposal for Policy Statement or Plan)*

To: **Otago Regional Council**
policy@orc.govt.nz

Name of submitter: *Gorge Creek Flats LTD*

Contact person: *Rowena Joan McDiarmid*

Address for service: [REDACTED]

I **wish / do not wish** to be heard in support of my further submission.

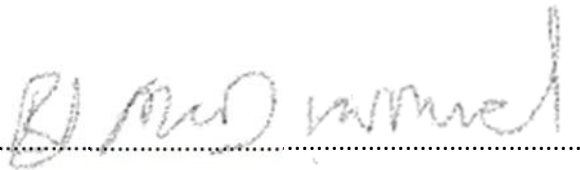
If others made a similar submission, I **will** consider presenting a joint case with them at a hearing.

Trade competitor's declaration (if applicable)

I ~~could~~ / could not gain an advantage in trade competition from this submission

I am / ~~am not~~ 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: 

Date:3-5-2020.....

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

We oppose the whole of PC7, as detailed in the following pages.

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

We seek:

- (a) Rejection of PC7 entirely or:
- (b) We seek the urgent and 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, economic and social impact assessments. This is a continuation of the existing work in the catchment prior to notification of PC7.
- (c) We support and adopt the submissions of the Omakau Area Irrigation Co, Otago Water Resource Users Group, Falls Dam Company Limited and the Manuherikia Catchment Group on Proposed Plan Change 7, including the reasons for those submissions and the relief sought in those submissions.

Give reasons for the decision you want made:

The reasons for the decisions sought by us are set out in the following pages:

Summary of Submission on PC7

1. This submission relates to Plan Change 7 in its entirety.
2. We oppose Plan Change 7 in its entirety.
3. The key reasons for my submission is;
 - a. Plan Change 7 is not required. The operative Otago Regional Council *Regional Plan: Water for Otago (RPW)* already provides a mechanism for the replacement of deemed permits in a way which ensures long term sustainable management of natural resources.
 - b. There are alternative methods, such as the Manuherikia Limit Setting plan change which would deliver better outcomes for both the environment and irrigators as opposed to adding a further period of 6 years of uncertainty for the catchment.
 - c. We consider PC7 to be completely unnecessary and will create a significant cost burden in having to proceed through two consenting processes within a 6 year timeframe, which is an inefficient use of resources, that could be better spent on farm efficiencies and environmental improvements.
 - d. The objectives and policies of PC7 do not give effect to Part 2 Resource Management Act (RMA).
 - e. PC7 fails to give effect to the National Policy Statement Freshwater Management 2017 (NPSFW).
 - f. PC7 also fails to give effect to the Regional Policy Statement.

Thank you for the opportunity to provide feedback on proposed Plan Change 7 to the Regional Plan: Water for Otago.

Gorge Creek Flats is a third generation family farming operation in both Ida and Manuherikia Valleys. We pride ourselves on being innovative through testing times.

Water is the life blood of our community without it Farming in Central Otago could look very different. We currently irrigate over 200ha under Kline irrigation with at the Idaburn, and 140ha of Pivot, and other spray irrigation at Loop Rd Becks..

We have invested heavily on irrigation because of a ORC directive (ORC water plan road show 2002) where it was stated spray irrigation was the future of effective and efficient irrigation and that it (the ORC) wanted all water users to be using spray irrigation by 2020.

We are very concerned about the unforeseen impacts Plan Change 7 could have on our community and surrounding region. In the same way the reforms of the late 1980's led to the birth of the NZ dairy boom, this reform will have unintended consequences not yet realised.

It is important to us that the whole community is recognised through this process.

There is a whole industry in our region that surrounds the use of irrigation. What will the effects be on the service providers, and what will the unintended effects be on our regional towns?

We believe this plan change stifles any future growth for the Otago region, both economic and social.