



SUBMISSION FORM – Proposed Plan Change 7(Water Permits) to the Regional Plan: Water for Otago

Form 5, Clause 6 of Schedule 1, Resource Management Act 1991

Office use only

Full name of submitter: Ken Gillespie

Name of organisation (if applicable): Hawkdun Idaburn Irrigation Co

Email: [Redacted]

Postal Address (or alternative method of contact):

[Redacted]

Telephone:

[Redacted]

I **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.
(Delete if you would not consider presenting a joint case)

Trade competitor's declaration (if applicable)

I could not (*circle one*) gain an advantage in trade competition from this submission

I am not (*circle one*) 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: ...Ken Gillespie.....30/04/2020..... Date:

(Or person authorised to sign on behalf of person making submission.
Signature not required if you make your submission by electronic means)

Please note that all submissions are made available for public inspection.

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

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

We strongly oppose this Plan change 7, and we request it be withdrawn because of potential detrimental effects to the Community and economy of Central Otago.

Plan change 7 is the short term solution for the Otago Regional Council to recover from inadequate preparation in previous years, and is a reaction to the Skelton Report of 2019, and the subsequent letter from Minister David Parker.

But in addition, to overcome that shortfall of preparedness, Otago Regional Council drafting Staff, have included many operating principles, which are very negative for the secure future of irrigation water supply, which causes significant concern and even distrust of future water management by the Council.

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

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

We request that the deemed permits to be replaced by October 2021, be considered under the current operative plan. Our submission will support the Otago Water Rights Users Group, and our right to be heard may be waived in favour of that Group.

We could not obtain a benefit from this submission.

Give reasons for the decision you want made:

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

10A .2.1 We oppose the use of the word AVOID in the heading paragraph, as the use of that term precludes any reasonable discussion as to renewal conditions. It does not allow any discussion upon the real values to that consent holder, their economic circumstances, or the value to their district of permanent work opportunities, and immediately sets an adversarial attitude to two way communication.

10A.2.1. Policies.

We absolutely oppose [b]. There is no increase in the area under irrigation, if the abstracted water is used for irrigation.

This is a ridiculous notion that the irrigation area is directly related to perceived problems being imposed by office bound Staff.

There is no evidence that the area irrigated has a direct effect on the environment , and this clause has no reasoning why there should be a limit put on the irrigated area .

In practise, many factors determine the changing annual footprint of irrigation area.

The first would be the mix of paddocks under cultivation that year within the irrigation footprint. The second and most relevant would be the variable weather of that season, and the availability of irrigation water supply.

This inclusion makes a mockery of clauses under 10A 3.1.1 and 10A [1v] relating to efficiency of use.

To achieve this level of efficient application of irrigation water, the Otago Regional Council has failed to consider the huge on farm costs, possibly exceeding \$1.m by completion, of storage dams, purchases and installing centre pivot or K line irrigation systems, reinstatement of all fencing and stock water systems, re sowing of pastures, for the efficient use by livestock of the crops grown.

They have also completely ignored the fact that Farmers and consent holders have to actually pay all the costs associated with these improved irrigation systems. And the only way Farmers repay loans required , and justify this huge undertaking, is through increased efficiency and reliability of summer production.

That is also why long term consents are absolutely required, 35 years being a reasonable expectation, as it is well established that short term consents as security, are not a bankable proposition to long term lenders.

And of course, we pay substantial off farm costs of water harvesting, storage of water and delivering to our farm boundary, through annual operating and maintenance charges to our Irrigation Company's
Does any other party contribute to these costs ??

Another, is the agricultural production cycle responding to the market signals for farm produced products, as the farm gate return is derived from the expected market return, by that processor. Overseas market signals determine all decisions by Farmers, as it is by producing marketable products that Farmers and other productive industries, horticulture and viticulture as good examples, fund their survival and provide full time work for rural communities.

10A.2.1

[e]

We request that this clause be withdrawn.

Again, like the use of the word AVOID , reasonable discussion is prohibited by this absolute rule, and we respectfully request that [e] be removed ..

10A3.1.1 [iii]

This clause also pre-determines that an historical period is used to determine an activity, where for various reasons changes have occurred, none of which have been non complying, yet efficiency of application, or improved methods of irrigation, will automatically be penalised. How honest is that approach ? If annual information is to be gathered, surely you would place more value on immediate past information,

We respectfully ask that this be removed.

10A3.1.1 [v1]

We oppose the averaging of water taken over any period, and in particular a 5 year period, as this is clearly another method called the sinking lid policy, whereby consent holders are stripped of a portion of their entitlement by administrative manipulation. We request that this proposal be abandoned.

10A .4.1

This methodology for calculation requires significant re drafting, by removal of all reference to averaging of take over any number of years. Remove all reference to averaging of annual takes.

The same request applies to 10A.4.3 and 10A 4.4

The injustices included in this proposed plan 7, in addition to the short term of 6 years, lead to a reduced confidence in the Otago Regional Council, as we believe that the delay with progressing the replacement of deemed permits by October 2021, is not the fault of farmer inaction in this matter. Farmers will prove that they have this renewal process well in hand, and lodge their applications on time. We need the Regional Council to reconsider their negative attitude to the use of water for irrigation. We have great concerns about the unintended impacts such a restrictive plan change will have on our region , our people and the environment . Irrigators are doing a good job , and we should celebrate the extraordinary performance of the Irrigation Company's in ensuring a continuous flow of water during each season. This is a big responsibility.

We note the reliance of the Central Otago community on intensive production enterprises, whom collectively are significant fulltime and seasonal employer. Who do provide valuable export produce, which the New Zealand Government has stated, is essential to our financial recovery, following the covid19 pandemic lock down.

And we are critical of the Iwi Management plan

Sec 5.3.

We believe that the clauses within this section , point to a lack of consideration and the responsibility being shouldered by Irrigation Companies, and Farmers.

It is not reasonable or logical to totally ban 35 year terms for consents .The cost of frequent renewals and uncertainty of midsummer supply of irrigation water, all add uncertainty for future planning and investment.

The inclusion of efficiency of application as proposed in points 26 – 29, all pre suppose that the Farmer could construct a storage dam [suitable location] , and that the water delivered during his rostered irrigation term, is sufficient to justify that expense. Not all irrigation allocations are equal, being from multiples of 24 hour days, to just one day in a 15 day roster.

The Otago Sports Fish and Game Management Plan 2015 – 2025.

Sec 6.2.8

We believe their reference to a “strategic and hands on approach to managing water allocation in these catchments, if mainstream values are to be satisfactorily restored “ gives us little confidence, that they understand daily variables in water harvesting and allocation.

Their following point 6.4.19 which includes a passing reference to water storage, could be a positive , if off season re filling of on farm storage dams was adopted.

We also were disappointed in the general conclusions of the Skelton report, and believe it did not add to the knowledge of Councillors, regarding allocation and use..

About the Hawkdun Idaburn Scheme

The Hawkdun Idaburn scheme has 65 shareholders, comprised of sheep , beef and deer farmers within a 70,000 ha catchment area. That isn't 70,000ha of irrigation just the command locality. There are no dairy farms within our catchment. Our reliability isn't high enough to support dairy farms. We are considered the scheme that provides good spring water and essential on farm stock drinking water.

For many the irrigation water is the only water coming on to the farms. Ours is a very dry area with annual rainfalls varying throughout the scheme area from 300 to 500 mm per year .

Some shareholders rely on the scheme supply for stock and domestic supply, as does Naseby township and Ranfurly in an emergency supply .

SUBMISSIONS MUST BE RECEIVED BY 5.00 PM ON Monday 4 May 2020

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Deliver to

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- 70 Stafford Street, Dunedin
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Online at

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Please note:

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.