

**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)

**Form 5**

**Submission on publicly notified proposal for policy statement or plan**  
Clause 6 of First Schedule, Resource Management Act 1991

To: Otago Regional Council  
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*This is a submission on the following proposed plan change:*  
Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water for Otago.

We could not gain an advantage in trade competition through this submission.

I am 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.

The specific provisions of the proposal that our submission relates to and the decisions we seek from Council are as detailed on the following pages.

We wish to be heard in support of our submission.

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

I wish to be heard in support of my further submission

3 May 2020

We are against the plan change

We oppose the 6-year permit as it is too limiting for a business economically, very hard to plan for future development or make improvements.

It would be very hard to have bank security with such a short time frame.  
It would make selling and buying properties almost unmarketable.

Cost of replacing multiple permits will be costly as we will need to do it twice in quick succession. The work that has gone into getting permit applications ready has been extensive. As advised by ORC we have employed consultants, and it has been a long process and an expensive one with science work and preparation of consents being undertaken. To have to repeat this process every 5 years is cost prohibitive.

Due to progress with science and technology our irrigating platforms are functioning very efficiently, and farmers have been working hard to ensure that the environment is always a major consideration in decisions on our properties, I am unsure of the benefits of such a short water permit.

I oppose the 2017-2018 no further irrigation allowed.

Taking one year as a snapshot of a farming business is not an adequate indicator of our property. In our case we have installed more efficient systems since 2017 -18 and so our area is slightly different. If we were cut back then our investments would be totally wasted.

One year does not indicate if it was an above average rainfall year or a drought year. These factors have a huge impact on the area we can irrigate. Each year is different in how you manage your property, good farming practising impacts the decisions on what paddocks we crop, or re -grass, or in Lucerne stands this clearly influences irrigation data.

Our water use data is also influenced during times we installed infrastructure, or replaced pipe or experienced unavoidable break down. These practical impacts need to be taken into consideration when assessing water allocations. Every year with better infrastructure, measuring technology and access to service providers our water use data has improved. It is an evolving and improving aspect of our farming business.

I oppose the method in schedule 10 A.4 to access rates and volumes of water over specific years, 2012 to 2017

Our allocated water under PC7 would be greatly reduced compared to the current ORC methods. This would have the effect of taking our water we have actually abstracted and have been using which would be a drastic result for our farm. The adverse effects on the economy of our farm would be substantial we estimated loss of earnings could be approximately up to 45% of our yearly income.

I oppose taking using 2017 – 2018 as the area irrigated as the criteria of a rule to assess our water permits.

We have put infrastructure in with accordance to our 55 lt/sec deemed water permits, which is required to run our spray systems which are k-lines and a Gun irrigator. But every year's water take varies due to climatic conditions, farm block management, infrastructure maintenance and renewal, using a one year record statistically would be a poor judge of how we manage and use our water, especially with the development that has been occurring with infrastructure. We are using the water strategically and efficiently already.

We have followed and complied with the regional councils rule in what the process would be to replace our consents, for many years and we have worked in good faith to prepare for this, but at the final hour the council has effectively changed the rules. During this ongoing process, we were not told that there were going to be a set of specific dates that the Council would use, The assumption was we had the time that our deemed permit was valid to complete infrastructure and that should be acknowledged in our water data Using this method does not acknowledge that meters have been put in at different times for different properties, it does not acknowledge that some properties have had problems with faulty or poorly performing meters.

This method does not consider properties efficient infrastructure improvements that have been done since meters were installed. We have made considerable investments on farm, close to a million dollars, in building an irrigation system with efficient infrastructure. We have put in Dams for each of our takes to manage our water for the benefit of our farms ability to be an economical unit whilst mitigating adverse results to waterway biodiversity and native fish. These plan changes do not recognise or acknowledge that our irrigation can be done working alongside the environment.

It appears that any data exceeding the limit on permit is treated as zero, which affects the final volume assessment.

ORC is not analysing properties data; I think that this leads to a lot of confusion depending on people's capabilities with excel to carry out this analysis.

It is unclear of the actual allocation in the Taieri. It is known under the current plan as fully allocated not over allocated.

It is unclear the method or policy of how the council will assess efficiency in PC7.

PC 7 stating the fish passage will be a criteria is confusing. Where will this be? from the point of take or past the point of take. It is also unclear what fish are being provided for, is the provision protecting the galaxiid populations. In some cases trout passage will be detrimental to the native fish.

## Section 32

Regarding section 32 evaluation, we did not complete the ORC online survey as we felt that it was very biased and poorly framed.

The Focus group was hand selected and stakeholder groups were given no say in who attended or who represented them, this doesn't appear to be a very democratic process for those of us directly impacted in the decisions.

Regarding the Environmental cost setting no minimum or residual flow: I believe will have an impact going forward on the environment. Most properties have a plan for protecting freshwater species or a residual flow already in their management of water ways, but if not, it could impact greatly. This detail has been included in our application which has been lodged as part of the Strath Taieri Water Users Group.

The infrastructure that our farm has put in to mitigate environmental damage, stock water reticulation, Pipes, meters, Dams, soil moisture technology, and good farming practice are not being acknowledged in this plan. The Controlled activity rule the pathway is a very high bar for us to jump over and still only gives up to 15years permits.

The claim in the Section 32 that PC7 will have no economic impact on irrigators is clearly false. Economically, there will be increased costs of multiple permits, also more costs associated with more science and monitoring programmes.

Short term consents will disadvantage our property's ability to securing finances from banks.

A reduction in allocation by using the methodology in PC7 schedules, is clearly going to have an economic effect on properties, it would mean a drop in our stock unit capacity impacting on our balance sheet substantially by. This could have a detrimental effect environmentally as we won't have the same financial stability and efficiency improvements may not occur, and also the unintended consequences of PC7 may mean that instead of a mainly all grass system, properties may add crops to utilise the reduction in allocation.

It seems an inconsistent stance that there will be no social costs compared to the status quo, as the minute there are economic effects there is automatically social impacts.

The less income will affect expenditure and then jobs will flow onto not only small rural business but the businesses that we deal with in larger centres.

Poor mental health is at an all-time high for rural people, I feel the social impacts of this policy change is already having an impact on rural communities in a negative way.

An alternative proposal would be going forward regarding renewing water permits, is to have residual flows on waterways that is consistent with that waterway, this will ensure there is less environmental impact to natives and biodiversity.

Properties are permitted the amount of water in relation to the infrastructure that they have built their irrigation scheme on and they have been using as assessed fairly and practically

When there is a higher water flow, a supplementary take to allow water storage dams to be filled.

This will have a very positive impact on keeping properties as economically viable units, whilst protecting biodiversity and native fish.

It will encourage farmers to continue to update infrastructure, monitor and put resources into ensuring that they are irrigating in the most environmentally, sustainable way while ensuring their agriculture business is the best it can be.

For this to be done, the length of water permits would preferably be a term up to 35years. As issued by commissioners for the Kyeburn permits two years ago. All of this can be done under the current plan. There is no need for PC7 in the Strath Taieri.

Having the confidence of long-term investment for families in rural properties is hugely important, the agriculture industry is a valuable contributor to the New Zealand's economy and our people.

Thank you for taking the time to read our submission.