



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: Brodley & Kirsten McEwen

Name of organisation (if applicable): Lilybank Co. Ltd

Email: [Redacted]

Postal Address (or alternative method of contact): [Redacted]

[Redacted]

Telephone: [Redacted]

I wish do not wish (circle preference) 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 / I could not (circle one) gain an advantage in trade competition from this submission

I am / 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: [Signature] Date: 1/5/20
(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')

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We oppose Plan Change 7 (PC7) completely and want it cancelled.

We understand the Otago Regional Council (ORC) can process water permit applications under the existing plan until new plans are notified. There is no need for an interim plan to be put in force.

Decision we want the ORC to make.

We want the ORC to cancel the proposed PC7.

We are new farmers who are just starting our career in farming with our first farm. We are in the Manuherikia catchment and have straight away incurred costs with applying for a new permit for our irrigation water. Considerable work has been done on obtaining scientific evidence based reports and employing consultants to get our application up to the requirements of the existing ORC rules. Our application is just about ready to be submitted, but if proposed changes in PC7 are adopted, all this work will have to be altered at considerable expense.

Our farm has wild flood irrigation and hard hose gun irrigation. We have plans to make using this allocated water more efficiently. This means we will need to put on a pivot and make a water storage dam. We have attached an email from our banker with what the idea of adopting 6 year permits would result in.

As per this email we would not be able to invest in infrastructure while the 6yr permit was in place. We are also worried about at the end of the 6 yr permit what will the new conditions be then. We need to have a 25 yr permit so we can move forward.

Re limiting irrigation area based on a single year

We will be hampered by the farm management practice of the previous older owners of the farm

Re no increase in irrigated area

With our plans of becoming more efficient with our allocated water, by stopping the wild flood practice and converting to pivot application (as per ORC advice) we could then take advantage of the efficiency of a pivot. This means we would be able to water more land than we do at the moment.

We need to be able use new technologies which will benefit everyone.

By using the take and volume limits based on the maximum use of 2012-2017 years will seriously hold us back on making improvements.

The irrigated area based on the irrigation year of 2017/18 is questionable with that year being declared an adverse event – drought year by MPI. Levels of irrigation water had been reduced by 50% in December 2017 and were about to go to stock water at the end of January 2018. Therefore the water available that year was not a lot.

We have a young family and spend countless hours with our children at the Manuherikia River. The water is clear and the kids have a great time in it. We feel the river has been well managed and provides a recreation area for all our community.

AP & BJ Groundwater

From: "Craig Burns" <craig.burns@westpac.co.nz>
Date: Thursday, 30 April 2020 3:24 p.m.
To:
Subject: Consent

Further to our discussion this morning my view on the proposed 6yr consent term for irrigation rights by ORC in a Banking context are as follows;

- This length of term is very short and does not provide the Bank with sufficient comfort that the capital cost of the development could be adequately funded over the term of the consent, hence it would be more difficult for customers to successfully source funding for an irrigation development project.
- If funding was successful the terms of the approval would be very difficult to meet given the Bank would require full repayment of the capital cost within the term of the consent, it is considered it would be very difficult for a farm operation to meet this repayment term given the capital cost could be upwards of \$1m which would therefore require minimum \$166,000k of debt repayment per annum.
- If the repayments cannot be made within the term of the consent the funding will not be considered by the Bank:

For this reason I would believe a minimum consent length of 25yrs would be required to allow the Bank to provide development funding for the industry.

Thanks Craig

Craig Burns
 Corporate Agribusiness Manager
 Agribusiness

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It's time. 

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30/04/2020