

[REDACTED]

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**From:** Otago Regional Council <notifications@engagementhq.com>  
**Sent:** Monday, 4 May 2020 1:17 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 Barrett

**Name of organisation (if applicable)**

Linnburn Station Ltd

**Email**

[REDACTED]

**Postal Address (or alternative method of contact)**

[REDACTED]

**Phone number**

[REDACTED]

**[REDACTED] 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?**

No

**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')*

Proposed Plan Change 7 (Water Permits)

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

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

Extend Permit terms from 6 years, change date ranges and approaches to analyzing data out to 30 June 2020 if the data is available

**Give reasons for the decision you want made:**

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

See attached and below 1.1 Term of 6 years In 2012 we put water meters in creeks and water takes as per ORC's request at a cost of \$65,000 and ever since I have been having them maintained and calibrated at an approximate cost of \$7000 per annum so I have spent approximately \$140,000 implementing & metering to date. Now the goal posts have been moved. It is not right to require people to measure as you did then change the rules. If you look at our website [www.linnburnstation.co.nz](http://www.linnburnstation.co.nz) you will see that soil health is our focus. We have done everything you required of us and we are good caretakers of the land. Now to say that we get to capitalise this expenditure and future expenditure over six years is not rational or fair. I will now have to transfer our deemed permit to a primary take at cost significant then be granted six years only to have to spend further money doing exactly the same thing in addition to all the other things you will require us to spend funds on. This is not commercially correct. You need to bring a commercial mindset to this process and enable the capital expenditure made historically and in years to come to be bankable? Six years does not achieve this and would not encourage me to implement solutions that would last thirty years as I may never get to realise their benefit. 1.2 Irrigation area cannot be bigger than the area irrigated in 2017-18 We battle to understand how increasing area translates to more environmental issues. Yes if one uses synthetic fertiliser however if you farm with long pastures and no synthetic inputs and your focus is on increasing soil carbon and you use less water doing so as you progress through the years then you should be allowed to increase the area you irrigate as long as you are increasing soil carbon doing so. 1.3 Allocation will be granted based on average maximums of records from 2012 to 2017 We feel a pragmatic approach needs to be taken where all the data needed to be analysed and manual adjustments made if necessary. We installed meters in 2012 by David Boraman the expert you told us to contact & use and he installed them in the bounds of the distance that ORC required of the main water course only for you to require that they be moved further away from the water course in approximately 2017 so the data I have from this time on is very important. It should all be taken into account out to 30 June 2020 and rational decisions made on the data available.

**Please attach any additional information.**

# Linnburn Station Ltd Submission to Plan Change 7 (Water Permits)

Company name: Linnburn Station Ltd [www.linnburnstation.co.nz](http://www.linnburnstation.co.nz) Contact person: Peter Barrett <https://nz.linkedin.com/in/peter-barrett-aa006023>

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## Contents

1.0 Controlled Activity Pathway .....	1
1.1.1 Term of 6 years .....	1
1.2 Irrigation area cannot be bigger than the area irrigated in 2017-18 .....	1
1.3 Allocation will be granted based on average maximums of records from 2012 to 2017 .....	1

## 1.0 Controlled Activity Pathway

### 1.1 Term of 6 years

In 2012 we put water meters in creeks and water takes as per ORC's request at a cost of \$65,000 and ever since I have been having them maintained and calibrated at an approximate cost of \$7000 per annum so I have spent approximately \$140,000 implementing & metering to date.

Now the goal posts have been moved. It is not right to require people to measure as you did then change the rules. If you look at our website [www.linnburnstation.co.nz](http://www.linnburnstation.co.nz) you will see that soil health is our focus. We have done everything you required of us and we are good caretakers of the land. Now to say that we get to capitalise this expenditure and future expenditure over six years is not rational or fair.

I will now have to transfer our deemed permit to a primary take at cost significant then be granted six years only to have to spend further money doing exactly the same thing in addition to all the other things you will require us to spend funds on.

This is not commercially correct. You need to bring a commercial mindset to this process and enable the capital expenditure made historically and in years to come to be bankable? Six years does not achieve this and would not encourage me to implement solutions that would last thirty years as I may never get to realise their benefit.

### 1.2 Irrigation area cannot be bigger than the area irrigated in 2017-18

We battle to understand how increasing area translates to more environmental issues. Yes if one uses synthetic fertiliser however if you farm with long pastures and no synthetic inputs and your focus is on increasing soil carbon and you use less water doing so as you progress through the years then you should be allowed to increase the area you irrigate as long as you are increasing soil carbon doing so.

### 1.3 Allocation will be granted based on average maximums of records from 2012 to 2017

We feel a pragmatic approach needs to be taken where all the data needed to be analysed and manual adjustments made if necessary. We installed meters in 2012 by David Boraman the expert you told us to contact & use and he installed them in the bounds of the distance that ORC required of the main water course only for you to require that they be moved further away from the water course in approximately 2017 so the data I have from this time on is very important. It should all be taken into account out to 30 June 2020 and rational decisions made on the data available.