

**From:** Otago Regional Council <notifications@engagementhq.com>  
**Sent:** Monday, 4 May 2020 4:23 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**

Andrew & Tracy Paterson

**Name of organisation (if applicable)**

Matakanui Station Ltd

**Email**

info@matakanui.co.nz

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

1524 Moutere Disputed Spur Road, Omakau 9376

**Phone number**

0272247511

**Do you 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?**

Yes

**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')*

Oppose PC7 in its entirety.

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

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

1. We want PC7 abolished completely; and 2. We want the completion of the limit setting plan change for the Manuherikia Catchment, including both a minimum flow and allocation limit based on good hydrology ecology information, analysis of reliability of supply, and full cultural, economic and social impact assessments. 3. We want the plan change to provide for long term consents of 25 years plus.

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

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

1. Un-bankable consents. We have been upgrading our irrigation infrastructure over the last 10 years from flood and border dyke to spray. 100% of our private deemed permit water has now been converted to gravity fed efficient spray irrigation (pivot and gun at a cost of \$2m -2012-15) and 50% of our company water (OAIC) has just been converted (Dec. 2019) to efficient spray irrigation (pivot and gun at a cost of \$650k). We have asked our bank if we can borrow to complete the remaining 50% of our OAIC water irrigation system upgrade (\$1m). Rabobank said that it could not lend to us as the water supply was not secure enough. They explained that the current permits were due to expire and the short term consents being proposed by the ORC were too short as the lending term would be longer than the consents. 2. PC 7 will have detrimental outcomes for water quality. This has an effect on water quality as we identified that the border dyke irrigation remaining is where our elevated E.coli levels come from. 3. We were also looking to make our private irrigation system more reliable by installing a large dam to capture the water when there is surplus i.e. when we are not full irrigating and between the seasons. We needed to borrow \$1.2m and we got the same response. We were told that we had to do all irrigation development in the short term out of cash flow! 4. The Skelton report recommended the rolling over of the deem permits to give the council time to update the Otago Regional Plan Water (RPW). PC7 does not do this. It has calculations, using average maximums based on actual use, over a period from 12/13 to 16/17. This time period does not make sense as the current Regional Water Plan (RWP) uses the most current 5 years of data. If we use the 12/13 to 16/17 period we have a reduction from actual use of 2,955,565m<sup>3</sup> in the 19/20 season to 1,355,027m<sup>3</sup> (PC7 calc. on 12/13 to 16/17 data) so an overall reduction of 1,600,538m<sup>3</sup> (54%) of annual volume from actual use. We are currently consented for 4,608,033m<sup>3</sup> so there would be an even bigger reduction from the consented volume. This has a huge financial cost. 5. The current RPW calls for efficient use of irrigation and most farmers are working towards this. As stated earlier we have been upgrading our water systems and have been working to a plan of making them efficient spray, gravity fed and with high reliability. PC7 does not reward us for doing that. It looks to use the 2017/18 seasons irrigation areas for the consent. We have since that time been installing pivots and guns that have made us more efficient and has allowed us to extend the area that we irrigate. Thus we would not be able to use our entire irrigation infrastructure as we would be restricted back to a smaller area than we have irrigated in the latest irrigation season. 6. It is also noted that the 2017-18 season was one of the driest on record. It therefore cannot be an accurate measure for a typical season. Given the severe water restrictions that were in place, and notably much earlier in the season than what is considered "normal", farmers were not irrigating all their land as it was impossible to do so. 7. The abolition of water permits in 2021 is meant to put everyone on a level playing field so that water in the catchment can be managed more effectively. What PC7 does is create different classes of water consent holders. For us personally that means our neighbours, who utilize the same water, have a significantly

longer consent already granted (35years) than what is proposed for us. This is inequitable, biased and based on very poor decision making. 8. The cost, both emotionally and financially, on us as farmers has been huge. This cannot be underestimated. For the Manuherikia Valley there has been 100's of millions of dollars spent on efficient irrigation systems, fencing of streams creeks and waterways, phenomenal number of hours researching, implementing and managing water monitoring sites and takes, hundreds of thousands of dollars which has already been spent on the current water plan in preparation for 2021 (and this does not take into consideration the cost of peoples time for attendance at meetings and groups who have been working towards the transition). We are now told that under PC7 we would have to do all this again and have the significant financial and emotional burden of going through this again in five years' time. 9. Consultation of PC7 has been insufficient. There has been no consultation with the wider community and this was brought to the attention of the chair of ORC when 7 councillors wrote a letter, to the ORC Chair, calling for a halt to the process, due to the Covid-19 pandemic, so that consultation could be completed but this was ignored and PC7 (and PC1 & PC8) was then "called in", by the Ministers office, before a ORC Council meeting that was to discuss PC7. 10. 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. We also support the submissions made by Manuherikia Catchment Group, Omakau Area Irrigation Co, Federated Farmers Otago and the Otago Water Resource Users Group. Thank you Andrew & Tracy Paterson  
Matakanui Station