

**From:** Otago Regional Council <notifications@engagementhq.com>  
**Sent:** Monday, 4 May 2020 4:19 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**

Ben O'Malley

**Name of organisation (if applicable)**

Millbrook Country Club Limited

**Email**

ben.omalley@millbrook.co.nz

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

Private Bag 50078, Queenstown

**Phone number**

021397608

**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')*

We are opposed to the plan change in full as it has been based on false information included in the Skelton report and is not necessary. A key area of concern for us is the 6 year consent period proposed which is simply not a bankable proposition. Millbrook has always had unused quota under its agreement with the Arrow Irrigation Company (AIC) and AIC has had free-board within its existing consents. In 2018 Millbrook commenced a \$50m golf course and residential development and in doing so was relying heavily on the AIC being able to renew its water permit. The thought of having a 6 year renewal of the AIC water permit is a scary prospect for Millbrook which now has 36 golf holes relying on the water that comes from the AIC scheme. These golf holes along with other facilities at Millbrook are a major tourism attraction for the region and the courses, which have sand based tees and greens (USPGA spec) simply cannot survive without regular daily watering. PC7 also proposes to lock in the 2017/18 year as the maximum bench mark year for the area of land irrigated which we believe is an arbitrary metric to use. Water taken from the river is a better metric rather than area. In the 2017/18 year Millbrook was not yet watering its new 9 hole expansion and so that would unfairly preclude the new expansion that we are investing in. By using water taken we could water additional land but rely more on water storage which we have invested in at our new development.

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

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

Reject it in full

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

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

Noted above