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From: Tim O'Sullivan [Redacted] >
Sent: Monday, 4 May 2020 7:06 am
To: Policy Reply
Subject: Submission for PC7

Morning,

My name is Tim O'Sullivan and I wish to submit the following detail in relation to PC7 in which I oppose, reasons being;

1. We own land in Dairy Creek and at Lowburn. We are currently working through the process of renewing the deemed permit which comes out of the Stratford Creek off the Pisa range. We have up to 120ha of flats we are looking to develop there which will go into cherry production and other higher end horticulture crops. If PC is passed I am told that the outcome and respective consent could be limited to 6 years. This makes absolutely no sense whatsoever. Traditionally consents have been for 25-35 years which aligns with intergenerational succession and general lifecycle of the employed system/componentry. In summary if the water is consented for no more than 6 years then I am going to struggle to convince investor/lenders that it's a safe secure investment meaning it is unlikely to get off the ground. After already removing the previous irrigation infrastructure we will be left with some debt we cannot service. From a regulatory point of view the same outcome can be achieved by adding/amending conditions within the consent to ensure efficient use and also you need to accept that a consent can be revoked at any so why is there the need to slap a 6 year expiry on it also, In summary this would be commercial suicide.
2. Prior to development at Lowburn which involved pulling out the border-dyke system we irrigated 70ha and applied an excess of 1000mm/yr. Why would you penalise me for introducing a new system which would see micro spray irrigation over a larger area. Due to the low infiltration rate of such system this should be promoted for the following reasons
 - a. no run off
 - b. reduced leaching
 - c. an increased irrigable area
 - d. no additional use in overall water consumption
 - e. a far more productive crop not only for the community but the wider nation.

I cannot see any downside in this whatsoever.

3. The introduction of additional plan changes does nothing more than undermine the current situation. There is sufficient policy to implement as it stands and the introduction of yet another plan change ahead of the implementation of the one before does nothing more than add additional confusion/frustration, more red tape & compliance costs. The status quo is currently stifling development & growth within the area and needs addressed immediately. As we learn about the negative impacts of Covid we need clear direction to promote growth and development which will soften the blow for our community.

Regards

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