



# 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: Francine Hore .....

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I **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 / 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: ..... Date: .....

(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')

Amend policy 10A.2.1 b. No increase in area under irrigation if the abstracted area is to be used for irrigation.....

Amend policy10A.2.1eThere is a reduction in the volume of water allocated for abstraction

Amend Rule10A3.1.1b.i The consent duration sought is no more than 6 years

Amend Rule10A3.1.1b.iii The consent application demonstrates that the land area under irrigation does not exceed that area irrigated in 2017-18 irrigation season

Amend Rule10A3.1.1b.iv The rate of take shall be no more than the average maximum rate of take limit recorded in the period 1 July 2012 – 30<sup>th</sup> June 2017

Amend Rule10A3.1.1b.iv The volume of water taken shall be no more than the average maximum of the daily volume limit or monthly volume limit etc

Methodology for calculating volume limits, and rate of take.

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

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

Irrigated area: Any reference or restriction on irrigated area should be removed from Plan Change 7

The council should issue these short-term consents with the lowest cost possible or at the full cost of the ORC using the best information available. Reduction in volume of water allocated for extraction, should be linked to established or future established minimum flows and not done in the absence of minimum flows.

Where minimum flows are established the consenting process should be exempt from plan change 7, these consents should continue under the existing plan.

Rules and methodology for calculating rate of take need removed from Plan Change 7

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

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

We are in the Upper Taieri Catchment, we are shareholders in the Maniototo Irrigation Scheme. We are not deemed permit holders, nor do we hold any consents expiring before 2025, however I am gravely concerned for the precedent set by the proposed rules and regulations

Irrigated area:

Limiting the size of irrigated area discourages irrigators from using water efficiently. This is because the same amount of water can be spread over a greater area of land with better infrastructure spray, there are significant environmental, economic and social gains to be made from encouraging this.

On Stonehenge we have invested in modern spray systems, it has been very costly to move away from flood irrigation. Through this process we are gaining environmental efficiencies, currently the farms N leaching rate is 3 on Overseas. To disincentivise best practice water use is very counterproductive. Having security of water is vital to animal welfare and the economic and community welfare of our area.

Minimum Flows

The Upper Taieri catchment is protected by 5 minimum flows, resource consents for takes upstream of a minimum flow point include conditions that users can not take water once levels drop below the downstream minimum flow. These flows were set through a rigorous community consultation process to allow for aquatic ecosystems and natural character values and allow for the sustainable taking of water (Otago Regional Council, 2015). Sub catchments within the Upper Taieri also work to maintain residual flows (established through a similar process) on smaller rivers such as the Kyeburn.

The Upper Taieri catchment is exceptional, but the precedent sent by Plan change 7 will alienate rural communities from stakeholder groups who will resort to an adversarial process at high cost, and everyone loses.

For this reason, I believe consents should be rolled over with minimal cost to landowners in catchments where residual flows are not set. Responsibility for lack of minimum flows in other catchments is with the Otago Regional Council so irrigators should not be penalised.

Rules and Methodology for rate and volume of take

Plan Change 7 reduces the allocation of water available for extraction with no evidence of efficiency gains. It is careless of a regional council to propose policy with this effect that could seriously impact the health and wellbeing of rural communities.

Water is most valuable to an irrigator when it is scarce. The methodology for calculating water indicates it will be reduced annually (10A.4.1 (6)) Some irrigation seasons are wetter than others so an allocation of water may not be used. If the abstraction in a wet year is lower than usual, that average will mean that the allocation of water is reduced over time. At Stonehenge we do not normally use our full allocation, but it is there for the dry year which

you need it, akin to an overdraft at your back, we need this security for economic resilience in our rural communities – poignantly highlighted in the current Covid crisis.

Incentivising irrigators to use their full allowance regardless of seasonal conditions is incredibly counter productive and will lead to more runoff.

### Conclusions

The pathway implied by policies rules and methodology in Plan Change 7 sends Otago down an adversarial pathway at high cost to all stakeholder groups. It will be more costly for the Otago Regional Council as they will somehow have to enforce all these rules. Costs of compliance will be passed on to irrigators along with costs created by diminishing water allocation without scientific data or economic impact reports. It alienates rural communities who often have a better understanding of how to achieve positive environmental and social outcomes than those employed to make the rules. I am gravely concerned for the health, wellbeing of and economic strength of rural communities if Plan Change 7 is implemented.

**Please attach any additional information.**

## **SUBMISSIONS MUST BE RECEIVED BY 5.00 PM ON Monday 4 May 2020**

Post to Otago Regional Council  
Private Bag 1954  
Dunedin 9054

Email to [policy@orc.govt.nz](mailto:policy@orc.govt.nz)

Deliver to Otago Regional Council offices at:

- 70 Stafford Street, Dunedin
- William Fraser Building, Dunorling Street, Alexandra
- Terrace Junction, 1092 Frankton Road, Queenstown

Online at [www.orc.govt.nz](http://www.orc.govt.nz)

### **Please note:**

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.