



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: Scott Tomlinson

Name of organisation (if applicable): Waihemo Downs Ltd.....

Email: [redacted]

Postal Address (or alternative method of contact): [redacted]

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Telephone: [redacted]

I wish / **I do not 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:Scott Tomlinson..... Date:24/3/2020.....

(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’)

My submission is in regards to the new proposed water permits plan change 7, 10A methodology for calculating actual water use..

I oppose the proposed plan basing calculations on an average of actual water usage calculated from the

‘The rate of take shall be no more than the average maximum rate of take limit recorded during the period 1 July 2012 – 30 June 2017 and calculated in accordance with the method in Schedule 10A.4’;

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

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

I believe granting permits for future water takes based on actual water use to be an unfair system due to seasonal variability in rainfall/irrigation requirements (2018 we had double our annual rainfall with 1160 mm so irrigation demand was reduced and winter supplementary takes not required), change in land ownership over this calculated period (only 3 of the 5 years of calculated period relate to our ownership) and continuation in irrigation investment which will increased future water use due to better coverage of sprinklers and reduced labour inputs to shift.

I would like the council to consider our investment in irrigation and to renew our water take permits in their current form to allow the financial viability of our farming operation, and then we can continue the investment in more efficient water use application methods and monitoring, and also justify the investment in more water storage to capture high flow winter flows to use during high demand times.

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Give reasons for the decision you want made:

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

I oppose this policy due to the fact we purchased the property in May 2014, starting irrigating in Oct 2014, so the calculated period includes 2 years of previous owner where water use may have been reduced due to previous farming system.

In the past 3 years we have made significant investment in irrigation (3 water meters to calculated soil moisture and conduct irrigation scheduling installed by Agrioptics at a cost of \$5,000/meter to live monitor soil moisture) and replacing less efficient hard hose gun irrigators with highly efficient fixed grid precision irrigators at a cost of \$150,000 to date.

The fixed grid irrigators we have installed are fully computerised allowing irrigation scheduling to operate only when conditions are deemed suitable (low wind and only between 8pm and 8am under current setup when lowest evapotranspiration).

To continue to invest in more fixed grid the renewal of our current permits are crucial to the financial viability of our farming business. In doing this more k line and hard hose irrigation can be replaced with variable rate/highly efficient fixed grid sprinklers.

Our supplementary water permit of 2008.487.v1 has not been used to its full potential over past 5 seasons due to 2012/13 not being under our management, then 2018 being a wet season so our current storage dam was already full for the winter. However with more water storage to install and if we get more normal dry seasons then this supplementary take will be used in relation to the current water permits.

Our primary water take of permit 2009.081.V1 is also vital to our irrigated farming business with minimum flow of 150 l/sec allowing reliability of water for the bulk of the season.

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Please attach any additional information.

SUBMISSIONS MUST BE RECEIVED BY 5.00 PM ON Friday 17 April 2020

Post to Otago Regional Council
Private Bag 1954
Dunedin 9054

Email to 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

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.