

SUBMISSION TO OTAGO REGIONAL COUNCIL ON PLAN CHANGE 5A

Form 5

Submission on publicly notified proposal for policy statement or plan
Clause 6 of First Schedule, Resource Management Act 1991

To: *Otago Regional Council*
policy@orc.govt.nz

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Farm Owners

Address for service: Malvern Downs, Tarras, No 3 R.D. Cromwell

This is a submission on the following proposed plan change – Plan Change 5A (Lindis: Integrated Water Management) to the Regional Plan: Water for Otago

The specific provisions of the proposal that our submission relates to and the decisions we seek from Council are as detailed on the following pages.

We wish to be heard in support of our submission.

SUMMARY OF SUBMISSIONS

1. Malvern Downs Ltd does not consider Council has met its planning responsibilities under Proposed Plan Change 5A (Lindis: Integrated Water Management).
2. The Section 32 Evaluation Report should be considered inadequate.

3. That in line with Council's own science, reports and evaluations over a 6-7 year period, that Option 2 of the 'Options for managing surface water in the Lindis Catchment' should be adopted.
4. That under Schedule 2A, for the Lindis River Catchment, a primary allocation minimum flow is adopted as follows:
 - 750 l/s October to November
 - 750 l/s May
 - 1,600 l/s June to September.
5. Council must adopt an appropriate and realistic transitioning framework for the Lindis Catchment. This should enable an extension of minimum flows for at least 5 years post expiry of deemed permits (mining privileges) - at minimum until 2 October 2026.
6. Full consideration of the community's identified values must be provided for, specifically those relating to the 'availability of water for irrigation during the growing season'. To date, present and future impacts have not been appropriately considered or evaluated.
7. That the Proposed Plan Change Mapping includes the Tarras Creek catchment and retains existing boundaries of the Lindis Alluvial Ribbon Aquifer.
8. That Council adopts a more workable and appropriate primary allocation limit of 1,500 l/s, rather than the only other option (1,000 l/s) considered.
9. That Council delete reference to both the Bendigo and Lower Tarras Aquifers from Schedule 4B.2.

1. INTRODUCTION

We have been farming Malvern Downs for over 100 years. My grandfather Hector Gibson, was one of the original farmers with the vision for what water from the

Lindis could do for the Tarras community, and was one of the farmers that helped build the scheme.

Once built Tarras received water and our community developed into the wonderful place that it is today. The water from the Lindis has been the 'life blood' of Tarras.

The Lindis river is unique, in that most years it goes dry, water goes underground and comes up 5 km downstream. The Tarras irrigators have always worked together in dry times to ration the water fairly for all the water uses. The priority permit holders have always taken cuts just like the rest of the water permit holders.

Malvern Downs is totally opposed to a minimum flow of 750l/s, especially when the ORC promoted 450l/s at a public meeting in Tarras. On our modelling it would mean 60 days in the middle of summer where we wouldn't have water, which would put our livelihoods, our families and employees in jeopardy.

We rely on water for our winter crops at this time, 80% of our income is reliant of water for these crops.

We also oppose there not being a phase in or transitional period of 5 years before the minimum flow is fully implemented. How can you possibly invest in new irrigation systems and infrastructure when you don't know if you will have your water right renewed?

We strongly oppose the boundary changes for the lower Tarras catchment and the ORC insisting we go to another water source. It would be near impossible to get another water right in 2021. We would have to own land

beside the river, then need at least five easements through other land owners land before we could get water to our own property. This would be cost prohibitive for our farming operation.

How can the ORC say who can have Lindis water and who can't?

In the proposed Plan change 5a it is disturbing to read extracts from the report, that the ORC commissioned from BERL in Wellington.

○ How can one write a report without consulting farmers and other effected parties? It is beyond belief and indicates an unfair bias and unsubstained facts and data.

The report contained not one thing that was relative to way we farm in the Lindis Valley.

A report written from a Wellington desk , using averages from other areas, that have completely different farming uses, compared with the Lindis catchment, is fasical.

○ Three years ago we put in two new pivots and used some of our Lindis water allocation, to irrigate some winter crops.

But because of the dry season and rationing were only able to grow 17 ton of fodder beet for cow grazing. Last year we changed to a new reliable source of water and we were able to grow 36 ton of fodder beet in the same area.

The difference from the unreliable water to the reliable water was a farm cost of \$350,000, and that was only on 42 hectares.

When you relate that to the BERL Economic Report it makes a mockery of the 1.76 million difference between 450 and 750 and that is only 42 Hectares.

This is just one small example of the sort of growth we can generate off our land with reliable water.

The social and economic implications of a minimum of 750 would be a tragedy for our district.

It would spell the end of the Tarras district as we know it. The water from the Lindis has been our lifeblood for over 94 years.

The ORC's recommendations of 750 minimum flow could be likened to dropping an Atom bomb in the Lindis Valley, so let us hope common sense prevails.

Robbie Gibson

William Gibson