

## **Submission to the Hearing Commissioners from the Rangitata Dairies Limited Partnership**

1. My name is Justin O'Brien, and I am employed as a Support Analyst by the Rangitata Dairies Limited Partnership (Rangitata Dairies).
2. Rangitata Dairies own and operate seven dairy farms, and support blocks. Five of the dairy farms, and one support block, are within the area covered by Plan Change 7. The properties are all irrigated from groundwater, and/or water supplied from the Rangitata South irrigation scheme.
3. This submission refers to the proposed policies and rules relating to groundwater allocation, and nitrogen loss from the farming activities.

### **Groundwater Allocation**

4. Policy 14.4.7 relates to groundwater allocation limits. The policy under part (a) provides for all existing groundwater abstractions (the "A" allocation limit). While Rangitata Dairies supports the policy, the allocation limit specified in Table 14(zb) needs to reflect this. The Section 42A report (page 334, 11.45) notes that the, "policy not necessarily reflected in the associated rule framework". The report (page 343, 11.102) indicates that the intent is not to adopt the sum of current takes as the proposed limit. Rather it is sought to reduce the allocation to the limits originally intended.
5. Policy 14.4.11 prioritises the use of water supplied by an irrigation scheme over water taken from on farm sources. Applications to take additional water (to the scheme water) will only be granted where it can be demonstrated that the water supplied by the scheme is used efficiently, and to the fullest extent possible, so as to minimise the abstraction of other water.
6. All of Rangitata Dairies properties within the area covered by the plan change receive water (to varying degrees) from the Rangitata South Irrigation Scheme. While Rangitata Dairies supports the policy, it is sought that in the application of the policy consideration is also given to the reliability of the water supplied by the scheme.
7. While the Section 42A report notes that policy does not restrict the use of other water sources when scheme water is unavailable, having provision for scheme water does not necessarily mean the water is available to the farm. Another method to manage this would be to have a total seasonal allocation of water from scheme and groundwater sources.
8. Policy 14.2.12 relates to the efficient use of water. The policy restricts the volume and/or rate of water allocated to any permit for irrigation that will replace an existing water permit to a volume and/or rate that reflects past use as determined from records of past use. Rangitata Dairies support this policy as allocating water based on actual usage will aid in ensuring allocations are realistic, and representative of actual use.

9. Under Rule 14.5.9, the taking and use of groundwater is a restricted discretionary activity provided the following condition is met:

*The take will replace a lawfully established take affected by the provisions of Section 124 of the Resource Management Act, and the rate, seasonal or annual volume of the take, in addition to all existing consented takes, does not exceed the allocation limit specified.*

10. While this rule provides for the granting of new water permits to replace expiring permits subject to the allocation limit, the allocation limit needs to reflect the policy. Another option would be to allow for the replacement of current water permits subject to the policies 14.4.11 and 14.4.12.

### **Nitrogen Loss Reductions**

11. Rangitata Dairies recognise that groundwater nitrate concentrations in some locations have increased, and the proposed nitrogen loss reductions outlined in policy 14.4.18 in these locations are in response to these increases.
12. The proposed reductions (Table 14(zc)) are consistent with the recommendation of the zone committee. This recognises the need for a reduction, and provides a timeframe for implementation and achievement of this change. Rangitata Dairies supports this policy.