

DDPR_feedback_0119s		
	Name	Elizabeth Soal
	Organisation	Waitaki Irrigators Collective Limited
	Email	ejcsoal@icloud.com
	Response Date	Aug 31 22
	Notes	
Q1	Select the chapter you want to provide feedback on	
Q2	In general, to what extent do you support the contents of this chapter?	
Q3	Objective/Policy/Rule/Standard reference:	
Q4	Feedback/Comments	
Q5	Objective/Policy/Rule/Standard reference:	
Q6	Feedback/Comments	
Q7	Objective/Policy/Rule/Standard reference:	
Q8	Feedback/Comments	
Q9	Objective/Policy/Rule/Standard reference:	
Q10	Feedback/Comments	
Q11	supporting documents?	
	0	
Q12	If you need more space, or have any other general comments, please leave them here	
	Kia ora, Please find attached feedback from the Waitaki Irrigators Collective Limited in relation to the draft District Plan for the Waitaki. Ngā mihi, Elizabeth Soal	



---

Waitaki Irrigators  
Collective Limited

---

Feedback to Waitaki  
District Council

---

2022 Draft District Plan

---

Representative:	Fraser McKenzie, Chair
Organisation Name:	Waitaki Irrigators Collective Limited
Address:	PO Box 159, Oamaru, 9444
Telephone:	03 434 6721
Email:	<a href="mailto:admin@waitakiirrigators.co.nz">admin@waitakiirrigators.co.nz</a>

Date: 31 August 2022

## About the Waitaki Irrigators Collective

The Waitaki Irrigators Collective Limited (WIC) is a company whose shareholders are five irrigation schemes and a society of individual irrigators that take water from Lake Waitaki, the Waitaki River (or its tributaries or connected groundwater) and use that water to irrigate land downstream of the Waitaki Dam, on both the north and south sides of the Lower Waitaki River.

WIC was formed in 2010 as a response to a number of shared issues which the schemes were facing at the time. In mid-2011, WIC expanded to include the incorporated society of independent farmer-irrigators.

WIC represents over 580 irrigators, with an irrigated area of approximately 80,000 hectares across North Otago and South Canterbury. The irrigators within the Collective contribute approximately \$550 million per annum in gross income to the local and national economies, and represent a capital value of land (with infrastructure) in excess of \$2.5 billion.

The overarching goal of WIC is to ensure the ongoing surety of water for its members. There are various dimensions to water surety, including surety of supply, reliability of supply, resource consent conditions relating to water take and usage, and community support for irrigation. WIC seeks to gain surety of supply within an approach which recognises the need for continuous improvement and environmental protection.

The shareholders of WIC are:

- the Kurow-Duntroon Irrigation Company Limited;
- the North Otago Irrigation Company Limited (NOIC);
- the Morven, Glenavy, Ikawai Irrigation Company Limited;
- the Maerewhenua District Water Resource Company Limited;
- the Lower Waitaki Irrigation Company Limited (LWIC); and
- the Waitaki Independent Irrigators Incorporated (including the Haka Valley Irrigation Company Limited (HVIC)).

These schemes and individuals use irrigation water for production across the primary sector, including the agriculture, horticulture, dairying and viticulture industries. Some of the schemes also provide water to other industries, town supplies and sports clubs. WIC represents a large number of farmers, farming companies and irrigators who create significant wealth for their communities, well beyond the farm gate.

The vast majority of irrigators within WIC have water take consents within the Environment Canterbury region. NOIC and LWIC have land-use within the Otago region. MGI, HVIC, and some individual irrigators' land use is within the Waimate District. The rest of WIC members are within the Waitaki District.

## **WIC's submission**

WIC's written submission supports the verbal feedback we have provided council staff, and that made by individual staff and representatives of WIC's member schemes.

WIC appreciates the opportunity to provide feedback on the draft Plan when it is at such an early stage of development. The feedback process has been well advertised within the District and encouraging community participation and involvement in the Plan development process will ensure that the plan is robust and effective. The Council team should be commended on the work they have done to engage with the community.

WIC's feedback points are made in the attached table.

Recommended deletions are shown as ~~striketrough~~  
 Recommended additions or amendments are shown in red

Section	Provision	Wording	Reason for recommendation
Definitions	Flow sensitive catchment	means the catchment of a river which is dependent on rainfall as its main source of flow, has limited ability to store water, and where evapotranspiration can be expected to exceed precipitation between December and April resulting in very low flows in summer and autumn compared with mean flows.	<p>WIC is seeking the addition of a condition in GRUZ-R15, whereby carbon forestry within flow sensitive catchments should be a non-complying activity. Therefore, a definition for these catchments is required.</p> <p>Note: It may also be appropriate to include a list of specific flow-sensitive catchments where this rule would apply.</p>
	Intensive outdoor primary production	<p>means primary production activities involving the keeping or rearing of livestock, or commercial aquaculture, where the regular feed source for the production of goods is substantially provided other than from the site concerned. The activity may be undertaken entirely outdoors or in a combination of indoors and outdoors, including within an outdoor enclosure. It includes:</p> <ol style="list-style-type: none"> <li>1. free-range pig farming;</li> <li>2. free-range poultry or game bird farming and</li> <li>3. aquaculture.</li> </ol> <p>It excludes the following:</p> <ol style="list-style-type: none"> <li>1. woolsheds;</li> <li>2. dairy sheds;</li> <li>3. calf pens or wintering accommodation for stock;</li> <li>4. pig production for domestic use which involves no more than 25 weaned pigs or six sows-;</li> <li>5. outdoor pastoral farming.</li> </ol>	<p>The definition as drafted could potentially capture outdoor dairy farming operations that utilise imported feed. The consequences of capturing outdoor dairy farming within this definition would be significant in relation to other rules. For example GRUZ-R10, where effluent from intensive outdoor primary production operations cannot be spread within 500 metres of a residential unit. This would significantly reduce the area that effluent could be used on for many farms in the Waitaki, which often have several residential buildings on site. A smaller distribution area could lead to negative environmental outcomes, by increasing the likelihood of contaminant leaching or run off by concentrating the effluent in a much smaller area.</p>

	Regionally significant infrastructure	Support current wording		Irrigation infrastructure is critically important to the Waitaki District and Otago region and should therefore be included within the definition of regionally significant infrastructure. The Waitaki has been recognised as the most significant catchment in Canterbury for supporting irrigation values, <sup>1</sup> and the District Plan should reflect this.
	Agricultural intensification	<p>means changes to land use after XXXX, being:</p> <ul style="list-style-type: none"> <li>(a) the conversion of land used for plantation forestry to pastoral land use; or</li> <li>(b) the conversion of land on a farm to dairy farm land; or</li> <li>(c) the irrigation of a farm's dairy farm land; or</li> <li>(d) the use of land on a farm as dairy support land.</li> </ul> <p><del>change in pastoral activities, including agricultural conversion arising from direct drilling, cultivation, top dressing, oversowing and irrigation but does not include dryland farming. It does not include changes to stocking rates, animal species or breed, or changes as a result of changes to feed types where it does not involve the above activities.</del></p>		This definition does not accurately reflect the intention of the definition. It includes some farming activities that are not necessarily intensification, but changing to them could actually improve a farm's environmental practices (such as direct drilling). Changing an animal breed can result in significant intensification, however, in relation to potential environmental impacts. The definition does also not define the time period from which the change in activity is to be measured.
GRUZ-R15	Carbon forestry	<p>Activity status: Controlled</p> <p>Where: CON-1</p> <p>The species of planting are indigenous to the ecological district in which the activity is to take place; and</p> <p>CON-2 The activity does not take place within an area identified as highly productive</p>	<p>Activity status when compliance is not achieved:</p> <p>Discretionary Where: DIS-1 Compliance is not achieved with CON-1; and</p> <p>DIS-2 Where the activity involves nonindigenous species, the carbon forestry activity does not take place: 1. within an Outstanding Natural Landscape or</p>	The introduction of carbon forestry can have significant impacts on flows in flow-sensitive catchments. In order to meet the requirements of the NPSFM and to support Te Mana o Te Wai, it is critically important that the water balance of these catchments are not further altered through intercepting flows in the headwaters.

<sup>1</sup> <https://researcharchive.lincoln.ac.nz/handle/10182/3901>

		<p>land or Highly Productive Land Overlay (LUC 2 or 3); and</p> <p>CON-3 Afforestation must not occur where a carbon forest tree, when fully grown, could shade a public road between 10:00am and 2:00pm on the shortest day of the year, except where the topography already causes shading; and</p> <p>CON-4 Afforestation must not occur—</p> <ol style="list-style-type: none"> <li>1. within 10m of the boundary of an adjoining property that is not owned by the owner of the carbon forest or the land it is located on (unless that adjoining property is also carbon forest or plantation forest); or</li> <li>2. except in the case of a dwelling located on the same property as the proposed carbon forestry is to be afforested, within the greater of— <ol style="list-style-type: none"> <li>a) 40m of a dwelling; and</li> <li>b) a distance where the forest species when fully grown would shade a dwelling between 10:00am and 2:00pm on the</li> </ol> </li> </ol>	<p>Rural Scenic Landscape, or</p> <ol style="list-style-type: none"> <li>2. within an Outstanding Natural Feature or Significant Natural Feature, or</li> <li>3. within a Significant Natural Area, or</li> <li>4. within a Coastal Protection Area, or</li> <li>5. within a Site or Area of Significance to Māori.</li> </ol> <p>Activity status when compliance is not achieved: Non-Complying Where:</p> <ol style="list-style-type: none"> <li>1. NC-1 Compliance is not achieved with CON-2, CON-3, or CON-4; or</li> <li>2. <b>Within a flow-sensitive catchment</b></li> </ol>	
--	--	---	---	--

		<p>shortest day of the year, except where topography already causes shading; or</p> <p>3. within 30m of the boundary of land used for papakāinga purposes or an urban area; or 4. within 10m of a significant natural area; and</p> <p>CON-5 The carbon forestry activity does not involve the planting of any pest, pest agent, or organism of interest identified in the relevant Regional Pest Management Plan.</p>		
--	--	--	--	--