

10 June 2025

Hon Chris Bishop
Minister for RMA Reform
Email – C.Bishop@ministers.govt.nz

Dear Minister

RE: Horizons Regional Council (Horizons) - Renewal of Existing Ground Water Consents

We wish to draw your attention to a serious and protracted issue regarding the renewal of Horizons' ground water consents on sand country in coastal Rangitikei.

We are a group of farmers who operate centre pivot and soft-hose irrigators under 20 individual consents on our respective properties. Our farms are located in the Santoft area, between Turakina and Bulls.

1 Horizons' Process / Capability

Our consents for irrigation and ground water extraction were issued for up to a maximum of 25 years and share a common expiry date of 1 July 2024. In anticipation of renewal, we engaged with Horizons CEO Michael McCartney, councillors and staff in July 2023 regarding the most pragmatic way to approach renewing our groundwater takes. Our proactive approach was welcomed by Horizons at this time.

Following this initial contact Horizons delayed and deferred further engagement. In fact, as applicants, we have continually chased Horizons in an effort to progress our consents' renewal process.

A report / model commissioned by Horizons and written by Christchurch-based Water Resources Services / Pattle Delamore Partners (PDP) Principal, Neil Thomas was presented to our group at a meeting in November 2023. Neither Horizons Consents' Team staff nor the Christchurch-based scientists have ever visited any of our farms.

The PDP report / model proposed all consent holders would need to reduce their irrigation takes by 30%. For context – to reduce irrigation by 30% on sand country is to effectively render irrigating the land futile, due to the low water-holding capacity of the soil.

Both this report, and a previous one commissioned by Horizons and completed by PDP in 2017, failed peer review and were deemed unfit for purpose. Alarming, the 2023 report did not apply any of the recommendations from the peer review of the discredited 2017 report. The cost of these reports was \$87,600 (via Official Information Act Request), which does not include Horizons staff or peer-review consultants' time.

Neither report referred to or considered the telemetry data collected from our individual bores. Horizons Consent Team staff were apparently unaware of this data's existence.

The cost of Groundwater Environmental Monitoring (charge per cubic metre of water consented) has doubled in the last four years. We feel strongly this money is not being spent prudently.

We are now more than 632 days from our first interaction with Horizons regarding renewing our common expiry consents, with no conclusion, progress or end in sight.

Our efforts to address these issues have done nothing but uncover a series of ineptitudes by Horizons resulting in our businesses, finances, livelihoods - and in some cases our mental health - being left in an untenable situation.

Together we have now spent hundreds of hours and in excess of \$250,000 navigating this process – to no avail.

As required in the consent process, several written communications to Iwi over the past 12 months requesting feedback / engagement on the effects of water extraction on their cultural values have gone unanswered.

2 Loss of Confidence

As farmers and landowners, we require certainty to invest and increase our productivity.

We have invested considerable capital to irrigate our sand country, in the order of \$1m + per irrigation platform. This delayed process is now forcing us to reduce productivity.

We are not applying for new consents; we are applying to **renew consents**, which all expired on 1 July 2024.

No investment or reinvestment has been made on the applicants' farms for over two years now.

Horizons are pushing for us to accept a 5-year consent with the threat of forcing us to publicly notify the renewal of our consents if we apply for longer than 15 years.

A 5-year consent - effectively 4 years now as our consents expired twelve months ago - is not acceptable and will force us to engage lawyers and take Horizons to court. This will mean more time and money not spent on growing the economy.

We pay an annual charge for Rates & Ground Water Environmental Monitoring to Horizons (which has doubled in the last four years). In addition we must now fund Ground Water Scientists to spend considerable time unravelling an erroneous model, and the subsequent recommendation of a 30% reduction in our consented water take. Other groundwater scientists assert the hydrology of the Santoft area is stable and sustainable according to the consent holders' recorded data.

As farmers, producers and businesses we have a shared interest in ensuring a sustainable ground water resource for the future.

We feel strongly our rates and fees paid to-date have been grossly mismanaged and wasted.

3 Conclusion

We have acted in good faith throughout this process yet now find we have exhausted all reasonable pathways to resolution. We seek your support and guidance to progress this issue.

The value of horticulture / vegetable production, dairy, and lamb and beef finishing from the Santoft region – which relies on consented access to water – is worth in excess of \$50m annually to the local economy.

The protracted and fundamentally flawed process; the impact on our businesses; the impact on our land values and ability to borrow money to upgrade equipment and invest in new technology; the reduced productivity of the region; and the toll on our time, finances and mental health is unconscionable.

Thank you for your consideration of this matter. We would appreciate an opportunity to meet with you to discuss this significant and ongoing issue; and indeed a number of other concerns regarding the impact of Horizons Regional Council's poor performance on productivity, economic growth and our ability to produce food and fibre.

Yours sincerely

Hew Dalrymple	Waitatapea Station
Roger Dalrymple	Waitatapea Station
John O'Brien	The Plains Farms, Hyde Park Farms, Regent Park Farms, Sanderry Farms
Richard Redmayne	Tunnel Hill
Tony Dowman	Hopkins Farming Group
Ben Hillas	Kilarney Farms
Mark Duncan	Otairi Station
Edwin Jurgens	Jurgens Farming Partnership

Attached – Horizons map depicting farm locations.



ACTIVITY ID	Bore ID
ATH-2015200608.00	301051
ATH-2014015224.00	312044
ATH-2013015034.00	312042
ATH-2013015033.00	312041
ATH-2013014655.02	312038
ATH-2012014597.02	312036
ATH-2011014062.00	301035
ATH-2011014055.00	312033
ATH-2011013549.00	322042
ATH-2010013155.00	322047
ATH-2010013146.00	312032
ATH-2010013126.00	322041
ATH-2010012713.00	312022
ATH-2009012986.02	312029
ATH-2009012781.00	312027
ATH-2008012389.00	301029
ATH-2008012237.00	312026
ATH-2008012236.00	312025 and 312026

Consent Query: Water Permits

Request # 127403

Prepared by: IM
Date: 17/10/2023. Ref no: 127403
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From: 9(2)(a) on behalf of Penny Simmonds (MIN)
To: Environment Portfolio
Subject: FW: Horizons regional council, irrigation renewal consent issues
Date: Monday, 22 September 2025 11:38:36 AM
Attachments: image001.jpg

Hi,

Can we get a response to this please?

Kind regards,



9(2)(a) (Administration) | Office of Hon Penny Simmonds
Minister for the Environment | Minister for Vocational Education
Associate Minister for Social Development and Employment
MP for Invercargill
P: 04 817 6815
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

Authorised by Hon Penny Simmonds, Parliament Buildings, Wellington

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From: Hew Dalrymple <hew@waitatapia.co.nz>
Sent: Monday, 22 September 2025 10:39 AM
To: Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>
Cc: Andrew Hoggard (MIN) <A.Hoggard@ministers.govt.nz>; Richard Redmayne 9(2)(a) >; John O'Brien <9(2)(a) >; bhillas <9(2)(a) >
Subject: RE: Horizons regional council, irrigation renewal consent issues

Good morning Penny and Andrew

I am following up on our recent meeting with you both in the Beehive.
Have you managed to make any headway with HRC on the irrigation consents we are all tied up with.
I have spoken with a retiring Horizons councillor and he tells me the council discussed slowing down the consenting process till new rules come in, this got voted on and lost, so the staff are told to go at full steam with the current rules.
Not good.
Any action possible from government and updates on timings please.

Regards
Hew Dalrymple

From: Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>
Sent: Monday, 14 July 2025 9:47 am
To: Hew Dalrymple <hew@waitatapia.co.nz>
Subject: RE: Horizons regional council, irrigation renewal consent issues

Good morning Hew,

Thank you for confirming.

When you arrive at Parliament, you will need to enter through the main Beehive entrance, pass through security, and sign in at reception or using the sign in kiosks. Please indicate you are here to meet with Minister Simmonds. Someone from our office will then collect you from reception and take you to the meeting room.

We look forward to receiving the names of all attendees when available.

Kind regards,

9(2)(a) | Roving Private Secretary (Executive Support)
Parliament Buildings | Wellington 6011 | www.beehive.govt.nz

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From: Hew Dalrymple <hew@waitatapia.co.nz>
Sent: Monday, 14 July 2025 12:03 am
To: Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>
Subject: Re: Horizons regional council, irrigation renewal consent issues

Good Morning 9(2)(a)

Thank you for the email and the invitation to meet with the ministers

The date and time are great thanks.

I am waiting to hear from others in the group that were part of the letter sent to minister Bishop as to their ability to come to Wellington also.

At this stage I can confirm 3 but will get back to you as promptly as possible when I hear from the remainder.

Regards

Hew Dalrymple

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From: Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>
Sent: Thursday, July 10, 2025 2:05:29 AM
To: Hew Dalrymple <hew@waitatapia.co.nz>
Subject: RE: Horizons regional council, irrigation renewal consent issues

Dear Hew,

Thank you for your email that was transferred to our office.

Minister Simmonds, Minister McClay, and Minister Hoggard would be happy to meet with you on Thursday 14 August, 10.30 – 11.15am, here at Parliament.

Please advise if this date and time is suitable.

Kind regards,

9(2)(a) | Roving Private Secretary (Executive Support)

Parliament Buildings | Wellington 6011 | www.beehive.govt.nz

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From: Hew Dalrymple
Sent: Tuesday, 10 June 2025 8:14 PM
To: Christopher Bishop (MIN)

Cc: 9(2)(a)

Subject: Horizons regional council, irrigation renewal consent issues

Dear Chris

Please find attached a letter from a group of concerned farmers and food producers, regarding significant delays with respect to re-consenting groundwater consents with the Horizons Regional Council.

We look forward to your response.

Best regards
Hew Dalrymple

Waitatapia Station

9(2)(a)

Hon Penny Simmonds

Minister for the Environment
Minister for Vocational Education
Associate Minister for Social Development and Employment



28 October 2025

PS-COR1557/CORM-4575

Hew Dalrymple
hew@waitatapia.co.nz

Dear Hew

Thank you for your email of 22 September 2025 about Horizons Regional Council irrigation consent renewal issues. It was a pleasure to meet you on 14 August and to have the opportunity to discuss your concerns regarding this matter.

Following our meeting, we briefly met with Council staff in early September to further understand the reasons behind the delays with the reconsenting process. We were unable to meet with elected representatives, but we do intend to meet with the Council Chair after the new Council has taken office to hear from them what their process is to achieve timely solutions.

Since we spoke, I understand the Council has offered two consent choices – one of which is a five-year consent with conditions similar to your current consent.

You may be interested to know that earlier this month, the Minister Responsible for RMA Reform, Minister for Agriculture and I sent a letter all Regional and Unitary Councils to set clear expectations for taking a pragmatic approach when issuing consents, ahead of the transition to the new planning system. Further information about this, including our letter to councils, can be found on the beehive website here: <https://www.beehive.govt.nz/release/government-sets-consent-expectations-councils>

As you know, my powers of intervention in this matter are limited. While the Minister Responsible for RMA Reform, Hon Chris Bishop, and I are jointly responsible for overseeing the Resource Management Act 1991, councils are responsible for its day-to-day implementation, which includes processing and making decisions on resource consents. As the responsible consent authority, it is at the Council's discretion to proceed with its current consenting process.

I remain hopeful that a solution will be found, and I thank you for keeping me informed of the situation.

Yours sincerely,

Hon Penny Simmonds
Minister for the Environment

Cc: Hon Andrew Hoggard, Associate Minister for the Environment
Hon Todd McClay, Minister for Agriculture