

This is a further submission to the Environmental Protection Authority where the matter relates to request for change to plan where Minister has made a direction under section 142(2) of the Resource Management Act 1991.

The plan change is the Water Permits Plan Change – Plan Change 7 to the Water for Otago: Regional Plan.

Part A: Further submitter details

Name of organisation: <i>(if relevant)</i>	Dunedin City Council		
Title:	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Dr <input type="checkbox"/> Other: (Please tick the appropriate title)		
First name of further submitter:		Surname of further submitter:	
First name of contact person: <i>(if different to above)</i>	Rachel	Surname of contact person: <i>(if different to above)</i>	East
Home Ph:		Work Ph:	03 477 4000
Mobile:			
Email address for service:	rachel.east@dcc.govt.nz		
Postal Address: <i>(or alternative address for service)</i>	PO Box 5045, Dunedin	Postcode:	9054

Part B: Interest

Only persons that come under the following categories may make further submissions.

<p>I am a person representing a relevant aspect of the public interest.</p> <p>The grounds for saying why I come within this category are explained below. <input checked="" type="checkbox"/></p>	<p>I am a person who has an interest in the WPPC that is greater than the interest the general public has.</p> <p>The grounds for saying why I come within this category are explained below. <input type="checkbox"/></p>	<p>I am the local authority <input type="checkbox"/></p>
<p>Please specify the grounds for saying why you come within the category above:</p>		
<p>Dunedin City Council is a territorial authority responsible for providing public water supplies to its communities. The Dunedin City Council holds water take permits from the ORC to take surface and groundwater for the purpose of providing this public water supply.</p>		

Part C: Do you wish to be heard in support of your further submission?

<p>I do not wish to be heard in support of my further submission <input type="checkbox"/></p>	<p>I wish to be heard in support of my further submission. <input checked="" type="checkbox"/></p> <p>If others make a similar submission, I will consider presenting a joint case with them at a hearing. <input checked="" type="checkbox"/></p>
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Part D: Further submission points

If you require additional space for any question(s) please attach further documents or paper to this further submission form and clearly state your name and the question(s) you are expanding on.

<p>Name of original submitter</p>	<p>Particular parts of the submission you support/oppose</p> <p><i>Please indicate whole submission or submitter point ID (e.g. 70005)</i></p>	<p>Are you in support of or in opposition to the particular whole/part of the submission?</p>	<p>What are your reasons for your support or opposition?</p>	<p>Do you seek for the whole/part of the submission to be allowed or disallowed (select one)?</p>
<p>Queenstown Lakes District Council</p>	<p>Whole submission</p>	<p>Support</p>	<p>The DCC supports the continued recognition and provision for community water supplies through the special status afforded under the existing rules in the RWP. There should be provision for existing community water takes seeking a replacement consent to increase the rate of take or volume of abstraction to provide for reasonably anticipated population growth over the term of the consent, and provision for new water take permits for community supply to have a consent duration longer than 6 years. It is crucial that water permits for community water supplies are of sufficient duration to give certainty and enable continuity of water supply to communities to enable social, economic and cultural well-being, particularly given the</p>	<p>Allow</p>

			<p><i>necessary forward planning and significant financial investment required.</i></p> <p><i>The DCC agrees that short term consents for community water supplies are an inefficient use of community resources.</i></p>	
Ministry for the Environment	Whole submission	Oppose	<p><i>The DCC supports the intent of PC7. However, PC7 removes recognition of scheduled community water supplies and the associated certainty a replacement consent would be granted. Under PC7, a replacement consent for a community water supply would likely be assessed as a non-complying activity, as it is reasonable to expect a replacement community water take consent to need to provide for an increased rate and/or volume of take for reasonable and anticipated population growth. Such consents also need certainty that a longer duration consent would provide.</i></p> <p><i>Amending policy 10.A.2.3 to remove all text after the words “for a duration of no more than six years” will mean replacement water take consents for existing community drinking water supplies can only be granted for six years. Deleting rule 10A.3.2.1, which provides a</i></p>	Disallow

			<p><i>non-complying activity path, will remove the ability to provide certainty and enable continuity of water supply for an existing community's long-term wellbeing by reasonably increasing the rate and volume of take and having a duration of consent longer than 6 years, particularly given the necessary forward planning and significant financial investment required.</i></p> <p><i>Further, in conjunction with the above, by adding a new rule that makes any activity that does not meet one or more of the conditions of Rule 10A.3.1.1 (including consent duration of no more than 6 years, and no increase in rate or volume of take) a prohibited activity would mean an adequate and fit-for-purpose replacement community water take permit could not be sought.</i></p> <p><i>Existing water supplies are essential and crucial for providing drinking water to communities. Retaining the special status for existing community water supplies is consistent with the National Policy Statement for Freshwater Management 2020</i></p>	
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			<i>because it prioritises the essential needs of people above all other uses.</i>	
<i>Otago Fish and Game Council and Central South Island Fish and Game Council</i>	<i>70045.04</i>	<i>Oppose</i>	<i>The DCC supports the continued recognition and provision for community water supplies through continued application of Rules 12.1.3.1 and 12.2.2A.1. In this regard, Policy 6.4.19 remains relevant when considering duration of consent for community water takes. In that regard, either Chapters 6 and 12 of the RPW should not be amended, or PC7 should be amended to provide an exemption for community water takes for drinking water supplies.</i>	<i>Disallow</i>
<i>Otago Fish and Game Council and Central South Island Fish and Game Council</i>	<i>70045.05</i>	<i>Oppose</i>	<i>Making it a prohibited activity for a replacement water take permit where a duration of longer than 6 years is sought, and/or to increase the rate and volume of take would mean community water suppliers would not have certainty of supply and could not provide continuity of water supply to communities to enable social, economic and cultural well-being, particularly given the</i>	<i>Disallow</i>

			<p><i>necessary forward planning and significant financial investment required.</i></p> <p><i>Making all applications for new surface water (including connected groundwater) abstraction activities noncomplying would add unnecessary additional time and costs to consenting for some new water permits, particularly in catchments where there are no identified allocation issues. There is no reasoning given for requesting stricter controls.</i></p>	
<i>Central Otago District Council</i>	<i>71178.05</i>	<i>Support</i>	<p><i>The DCC agrees that PC7 should be consistent with the existing provisions of the RPW for community water supplies for drinking water.</i></p>	<i>Allow</i>
<i>Clutha District Council and Waitaki District Council</i>	<i>71173.06, 71173.07 & 71173.08</i>	<i>Support</i>	<p><i>The DCC agrees PC7 should be amended to not apply to any Schedule 1B or 3B water take or any associated water supply take because they are crucial drinking water supplies, essential for community wellbeing and water security for existing communities.</i></p> <p><i>The DCC also agrees that if new or existing community water takes are granted a duration longer than 6 years,</i></p>	<i>Allow</i>

			<i>a review clause to address the relevant provisions of the new operative Land and Water Regional Plan is appropriate.</i>	
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Part E: Signature

Signature of person making further submission or person authorised to sign on behalf of person making further submission. Please note a signature is not required for electronic submissions.

Signature:  Aaron Hawkins, Mayor of Dunedin

Date: 1 October 2020