

FORM 6

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION ON PUBLICLY NOTIFIED PROPOSED POLICY STATEMENT OR PLAN, CHANGE OR VARIATION**

Clause 8 of Schedule 1, Resource Management Act 1991

To: Environmental Protection Agency

**Name: Public Health South**

**Address: PO Box 2180, QUEENSTOWN 9349**

1. This is a further submission in support of, or in opposition to, submissions on the Proposed Plan Change 7.
2. Public Health South is a party with an interest in the proposal that is greater than the interest of the general public. Southern District Health Board (Southern DHB) presents this submission through its public health service, Public Health South (PHS). Southern DHB delivers health services to a population of 335,900 and has responsibility under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities. It seeks to promote equity and to reduce adverse social and environmental effects on the wellbeing of people and communities. They aim to create or advocate for healthy social, physical and cultural environments. Public Health South's original submission on the Proposed Plan Change 7 sets out the reasons for their position to the Proposed Plan Change.
3. The original submissions that Public Health South either supports or opposes are described, and the reasons for Public Health South's support or opposition are detailed in the table attached as Annexure A to this further submission.
4. Public Health South seeks that the relief set out in Annexure A, in terms of allowing or disallowing original submissions, be granted.
5. Public Health South does wish to be heard in support of this further submission. If others make a similar submission, Public Health South will not consider presenting a joint case with them at a hearing.

Date: 30<sup>th</sup> of September 2020



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Note to person making further submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority.

Annexure A

Table 1: Public Health South’s position on submissions of the Proposed Plan Change 7

Submitter	The particular parts of the submission PHS supports or opposes	Relief sought by submitter	Public Health South’s position and reasons	Relief sought
Dunedin City Council Submission ID 70026	70026.01  70026.02	a) Recognise and provide for community water supplies for drinking water by amending PC7 so it does not apply to any existing take for community water supply for drinking water b) Update Schedules 1B and 3B to include all existing community water supplies for drinking water	PHS supports the need to supply safe drinking water for all New Zealanders. Safe drinking water is a fundamental requirement for the public health of New Zealand. <sup>1</sup>	Allow submission and incorporate relative provisions into the plan; acknowledge the need for access to a safe and adequate drinking water supply.
Central Otago Environmental Society Submission ID 70033	70033.01	a) Implement an interim consenting regime to ensure that issued consents are fit for purpose and do not undermine the implementation of the NPSFWM 2020. Consents issued going forward must implement the NPSFWM 2020.	PHS supports the need to incorporate and implement the objectives and policies in the NPSFM 2020 as this is the overarching Policy Statement to support national requirements.	Allow submission and incorporate relative provisions of the NPSFM 2020 to support this Proposed Plan Change.
Otago Fish and Game and Central South Island Fish and Game Submission ID 70045	70051.01	a) Amend as shown: Transition toward the <del>long-term</del> sustainable management of surface water resources in the Otago region by establishing an interim planning framework to <u>commence phasing out over-allocation, avoid increasing over-allocation, manage new water permits,</u>	PHS supports an interim planning framework to assist with the transition from current water permits that expire prior to 31 December 2025, until the new Land and Water Regional Plan is made operative.	Allow submission and incorporate an interim planning framework to support this Proposed Plan Change.

<sup>1</sup> Ministry of Health. Drinking-water Standards for New Zealand 2005 (Revised 2018). <https://www.health.govt.nz/publication/drinking-water-standards-new-zealand-2005-revised-2018> (accessed September 09, 2020).

		and including the replacement of deemed permits and water permits to take and use surface water ( <del>including and groundwater considered as surface water</del> ) where those water permits expire prior to 31 December 2025, until the new Land and Water Regional Plan is made operative.		
Otago Province Federated Farmers of New Zealand Submission ID 70047	70047.01 – 70047.08	a) 'Deletions'	PHS opposes all of the Otago Province Federated Farmers of New Zealand submissions.	Disallow submission and do not acknowledge the relevant provisions into the plan.
Queenstown Lakes District Council Submission ID 70048	70048.01 70048.02  70048.03	a) Retain as notified  b) Amend as shown: (c) There is no increase in the instantaneous rate of abstraction <u>except in relation to a community water supply where needed for population growth that is reasonably anticipated over the term of the consent;</u> and (e) There is a reduction in the volume of water allocated for abstraction <u>except in relation to a community water supply where an allowance may be made for population growth that has occurred or is reasonably anticipated over the term of the consent.</u>	PHS supports the need to supply safe drinking water for all New Zealanders. Safe drinking water is a fundamental requirement for the public health of New Zealand. <sup>2</sup> Further, PHS acknowledges Queenstown as a growing population and the need to account for this in the amount of community water supply that is available. PHS supports QLDC's amendments to not include community water supply allowance as the Drinking Water Standards for New Zealand 2005 (Revised 2018), state the requirement to provide safe drinking water to the entire population.	Allow submission and incorporate relevant provisions to acknowledge population growth and community water supplies.

<sup>2</sup> Ministry of Health. Drinking-water Standards for New Zealand 2005 (Revised 2018). <https://www.health.govt.nz/publication/drinking-water-standards-new-zealand-2005-revised-2018> (accessed September 09, 2020).

		c) Amend as shown: Irrespective of any other policies in this Plan concerning consent duration, only grant new resource consents for the take and use of water for a duration of no more than six years, <u>except where relating to community drinking water supplies where longer term durations may be granted.</u>	As above.	
Sowburn Water Co Ltd Submission ID 71014	71014.01 – 71014.06	a) The Taieri Catchment (including Sowburn Creek) water permits are 80% processed using the existing plan rules and policies. It is recommended that these continue to be processed through the existing plan rules and policies and refuse all aspects of PC7.	PHS opposes this submission that ‘refuses all aspects of PC7.’	Disallow submission and do not incorporate relative provisions.
Last Chance Irrigation Company Limited Submission ID 71015	71015.01 – 71015.04	a) Wishes to see the whole of PC7 withdrawn or amend PC7 to introduce a simple permitted activity rule that enables current permits to be exercised until the new Land and Water Plan is operative.	PHS opposes this submission that ‘sees the whole of PC7 withdrawn or amended.’	Disallow submission and do not incorporate relative provisions.
Pisa Irrigation Company Limited Submission ID 71043	71043.01 – 71043.09	a) Wishes to see the whole of PC7 withdrawn, OR amend existing policies and methods in the RPW, OR withdraw PC7 and replace with simple transitional objectives and policies implemented by a permitted activity rule and supporting methods.	PHS opposes this submission that ‘sees the whole of PC7 withdrawn or amended.’	Disallow submission and do not incorporate relative provisions.
Hawkdun Idaburn Irrigation Co Submission ID	71060.01-70160.08	a) Wishes to see the whole of PC7 withdrawn and deemed permits to be replaced by October 2021, be considered under the current operative plan.	PHS opposes this submission that ‘sees the whole of PC7 withdrawn.’	Disallow submission and do not incorporate relative provisions.

71060				
Maniototo Irrigation Company Submission ID 71071	71070.01 – 71070.05	a) The Maniototo Irrigation Company (MIC) oppose all of Plan Change 7. MIC want the Plan Change to be removed and the remaining water permits that expire before the reviewed Regional Plan Water for Otago (RPW or Water Plan) is operative processed under the current Water Plan. If the whole of PC7 is not withdrawn, then the Upper Taieri Catchment should be excluded from PC7.	PHS opposes this submission that ‘sees the Plan Change be removed.’	Disallow submission and do not incorporate relative provisions.
Maniototo West Side Irrigation Company Ltd Submission ID 71084	71084.01, 71084.03 – 71084.05,	a) Council to proceed with applications under the existing plan where minimum flows are in place and council to issue interim consents where there is no established minimum flow to allow the status quo until this has been remedied. This will mean using the best information available in a non-notified process and any documents and information used should be retained for use in subsequent longer term applications.	PHS opposes this submission that ‘proceeds with applications under the existing plan.’	Disallow submission and do not incorporate relative provisions.
Manuherehia Irrigation Co-operative Society Submission ID 71094	71094.01- 71094.08	a) Wishes to see the whole of PC7 withdrawn.	PHS opposes this submission that ‘sees the whole of PC7 withdrawn.’	Disallow submission and do not incorporate relative provisions.
North Otago Irrigation Company Limited	71105.01	a) Amend Policy 10A.2.1 to read: <u>Only consider granting applications that will replace deemed permits, or water permits to divert, take or use surface</u>	PHS opposes this submission and the amendments proposed.	Disallow submission and do not incorporate into the relative provisions.

<p>Submission ID 71105</p>	<p>71105.02</p>	<p><u>water (including groundwater considered as surface water under policy 6.4.1A (a), (b) and (c) of this Plan) where those water permits expire prior to 31 December 2025, except where:</u></p> <p><u>(a) it will replace a lawfully established divert, take or use affected by the provisions of Section 124-124C of the RMA; and</u></p> <p><u>(b) There is no increase in the instantaneous rate of abstraction; and</u></p> <p><u>(c) An appropriate residual flow, minimum flow or take cessation condition is applied to the new permit; and</u></p> <p><u>(d) An appropriate annual volume is proposed in accordance with Method 10A.4.</u></p> <p>b) Amend Rule 10A.3.1 to read: <u>Any activity will replace a lawfully established divert, take or use affected by the provisions of Section 124-124C of the RMA where that water permit expires prior to 31 December 2025 is a controlled activity provided the following conditions are met:</u></p> <p><u>(i) The consent duration sought is no more than six years past the expected notification date of the plan change to the Regional Water Plan that will introduce new water quantity provisions; and</u></p> <p><u>(ii) There is no increase in the instantaneous rate of abstraction; and</u></p> <p><u>(ii) An appropriate residual flow, minimum</u></p>		
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	<p>71105.03</p> <p>71105.04</p>	<p><u>flow or take cessation condition is applied to the new permit; and</u></p> <p><u>(iv) An appropriate annual volume is proposed in accordance with Method 10A.4; and</u></p> <p><u>(v) The area irrigated does not exceed that which was irrigated at 30 June 2018, or any increase in the irrigation area is limited to 20 hectares above that which was irrigated at 30 June 2018.</u></p> <p><u>The Council reserves control over the following matters:</u></p> <p><u>a. Whether the amount of water diverted, taken or used is reasonable for the intended use. In assessing reasonable use for irrigation purposes, the council will consider the matters set out in Method 10A.4; and</u></p> <p><u>b. If relevant, methods for preventing fish from entering the water intake; and</u></p> <p><u>c. The point and method of measurement and the method for transmitting recorded data to Council.</u></p> <p><u>Pursuant to sections 95A and 95B of the RMA, an application for resource consent under this rule will be processed and considered without public or limited notification.</u></p> <p><u>Limited notification to affected order holders in terms of section 95F of the RMA will be necessary, where relevant, under Section 95B(3) of the RMA.</u></p> <p>c) Amend Rule 10A.3.2 to read:</p>		
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	<p><u>Any activity will replace a lawfully established divert, take or use affected by the provisions of Section 124-124C of the RMA where that water permit expires prior to 31 December 2025 that does not meet condition (i) of Rule 10A.3.1 is a discretionary activity</u></p> <p>d) Amend Method 10A.4 to read:  <u>Three methods are provided for determining the seasonal irrigation demand.</u></p> <p><u>1. Records of past use, moderated to ensure the annual volume is sufficient to meet demand conditions that occur in nine out of ten years for a system with an irrigation application efficiency of 80%; or</u></p> <p><u>2. Use of a model that has been field validated and shown to reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall be compliant with the following criteria:</u></p> <p><u>a. an irrigation application efficiency of 80%;</u></p> <p><u>b. a system capacity to meet peak demand;</u></p> <p><u>c. a nominal irrigation season from 1 September to 30 April; and</u></p> <p><u>d. demand conditions that occur in nine out of ten years.</u></p> <p><u>3. Using the methodology set out below and the figures set out in Table 10A.4. To determine the applicable seasonal</u></p>		
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	<p><u>irrigation demand standard and derive an annual volume:</u></p> <ol style="list-style-type: none"> <li><u>1. find the total seasonal demand from Table 10A.4 for the particular soil PAW class. Where the soil PAW class is between 100 - 200 mm, insert the appropriate PAW for the soil to be irrigated into the formula to determine the total seasonal demand;</u></li> <li><u>2. determine effective irrigation season rainfall for the location;</u></li> <li><u>3. deduct this rainfall amount from the total seasonal demand amount to give the irrigation requirement in millimetres – this provides the seasonal irrigation demand standard;</u></li> <li><u>4. adjust this seasonal irrigation demand standard by multiplying by 10 to find the volume of water (cubic metres) per hectare per season; and</u></li> <li><u>5. multiply this amount by the area that is to be irrigated to give the annual volume.</u></li> </ol> <p><u>Table 10A.4</u></p> <p><u>Soil PAW Class Total Seasonal Demand</u></p> <p><u>&lt; 100 mm 910 mm</u></p> <p><u>100 – 200 mm 910 -1.6(PAW-100) mm</u></p> <p><u>&gt;200 mm 750 mm</u></p> <p><u>Soil PAW Class represents the upper and lower limits of the soils that are generally irrigated in Otago in terms of the profile available water (PAW) of the soils.</u></p> <p><u>Between the upper and lower limits set out in Table 10A.4, a sliding scale is used to determine</u></p>		
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	<p><u>the relevant total seasonal demand. Total seasonal demand is the total amount of water required to satisfy plant water needs during the main growing period. This demand can be satisfied by rainfall and irrigation. In determining the irrigation component, provision has been made for:</u></p> <ol style="list-style-type: none"> <li><u>1. an irrigation application efficiency of 80%;</u></li> <li><u>2. a system capacity to meet peak demand (between 4mm/ha/day and 6.5 mm/ha/day);</u></li> <li><u>3. a nominal irrigation season from 1 September to 30 April;</u></li> <li><u>4. demand conditions that occur in nine out of ten years; and</u></li> </ol> <p><u>Effective irrigation season rainfall is the amount of rain that will contribute to crop growth over the nominal irrigation season. In determining this amount, provision has been made for:</u></p> <ol style="list-style-type: none"> <li><u>1. rainfall that occurs on average in six out of ten years (which, together with a complementary seasonal irrigation allowance, is estimated to meet total water demand with a reliability of nine out of ten years based on analysis of long-term climate data); and</u></li> <li><u>2. excluding daily rainfall amounts of less than 5 mm, or cumulative rainfall amounts in consecutive days in excess of 50 mm.</u></li> </ol> <p><u>Seasonal irrigation demand standard for a given soil PAW the depth of water</u></p>		
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		<u>(measured in millimetres) per hectare per year required to be supplied by irrigation to satisfy plant water demand after allowing for effective irrigation season rainfall.</u>		
Carrick Irrigation Co Ltd Submission ID 71116	71116.01 - 71116.06	a) Wishes to see the whole of PC7 withdrawn and ORC to process the permits under the current plan. If the whole PC7 is not withdrawn, then the submitter wishes that a permitted activity rule is established that enables the permits to roll over as is without any change.	PHS opposes this submission that 'sees the whole of PC7 withdrawn.'	Disallow submission and do not incorporate relative provisions.
Omakau Area Irrigation Company Limited Submission ID 71137	71137.01- 71137.11	a) Wishes to see the whole of PC7 withdrawn, OR undertake urgent and robust completion of the limit setting plan change for the Manuherikia Catchment, including both a minimum flow and allocation limit, based on robust hydrology, ecology information, analysis of reliability of supply, and completed cultural, economic and social impact assessments. This is a continuation of the existing work in the catchment prior to notification of PC7.	PHS opposes this submission that 'sees the whole of PC7 withdrawn.'	Disallow submission and do not incorporate relative provisions.
Terraces Irrigation Limited Submission ID 71139	71130.01- 71130.07	a) Wishes to see the whole PC7 withdrawn or amend PC7 to ensure that those who need to vary or change existing permits can do so without consideration under PC7, including the matter of consent duration. Those permit holders taking surface water (and connected groundwater) from the Clutha/Mata-Au	PHS opposes this submission that 'sees the whole of PC7 withdrawn.'	Disallow submission and do not incorporate relative provisions.

		River should not be included as the Clutha/Mata-Au is not fully allocated. Those permit holders willing and able to lodge their replacement applications before October 2021 should not be prevented from seeking the long-term consents that they need, as many have done already.		
Royal Forest and Bird Protection Society of New Zealand Inc Submission ID 71149	71149.03	a) Add policy that gives effect to the mandatory direction of the NPSFM.	PHS supports the need to incorporate and implement the objectives and policies in the NPSFM 2020 as this is the overarching Policy Statement to support national requirements.	Allow submission and incorporate relative provisions of the NPSFM 2020 to support this Proposed Plan Change.
Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga (collectively mana whenua)  Submission ID 71151	71151.01-71151.10	a) Retain as notified	PHS supports this submission to 'retain as notified.'	Allow submission.

Ida Valley Irrigation Company Limited Submission ID 71163	71163.01-71163.07	a) To revoke in its entirety Plan Change 7 and to have water permit/consent applications heard and decided under the current planning documentation.	PHS opposes this submission that 'revokes PC7 in its entirety.'	Disallow submission and do not incorporate relative provisions.
Te Rūnanga o Ngāi Tahu (Te Rūnanga) Submission ID 71171	7117.01	a) Te Rūnanga supports the submissions from Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga, Waihōpai Rūnanga, Te Rūnanga Ōraka Aparima and Te Rūnanga o Awarua sent in as submissions from Aukaha and Te Ao Marama Inc. Te Rūnanga adopts the relief sought in those submissions.	PHS supports this submission.	Allow submission.
Clutha District Council and Waitaki District Council Submission ID 71173	71173.02 71173.05	a) Oppose PC7 in its entirety in relation to general irrigation and commercial water uses, Schedules 1B, 3B and associated water supply takes and values, and seek that it be either amended or removed.  b) Amend to not apply to any Schedule 1B or 3B water take or any associated water supply take. Amend from a "reduction" in water allocation to "no increase" in water allocation.	PHS opposes this submission that 'opposes PC7 in its entirety.'  PHS acknowledges the need to have a 'reduction' in the amount of water taken in some water allocation. This is due to the fact that there are public health issues associated with over allocation. Including a decrease in minimum flows, which is associated with high levels of Escherichia Coli (E.Coli), which is detrimental to health. <sup>3</sup>	Disallow submission and do not incorporate relative provisions.

<sup>3</sup> The Water Project. Health implications of Escherichia Coli (E.Coli) in Recreational and Drinking Water. <https://thewaterproject.org/water-scarcity/health-implications-of-e-coli#:~:text=Diseases%20acquired%20from%20contact%20with,%2C%20and%20low%2Dgrade%20fever> (accessed September 29, 2020)

			PHS supports a duration of consent of 'no more than' six years and believes that consideration should not be given to special clauses.	
	71137.06	c) Amend to not apply to any Schedule 1B or 3B water take or any associated water supply take. Amend to remove reference to a "duration of consent of no more than six years", and alternatively replace with a specific "PC7 review clause" to apply by 31 December 2025 or thereafter, on any new water permit to address the relevant provisions of the new operative Land and Water Regional Plan.	PHS supports a duration of consent of 'no more than' six years and believe that considerations should not be given to special clauses.	
	71137.07	d) Amend to not apply to any Schedule 1B or 3B water take or any associated water supply take and remove reference to "duration of consent of no more than six years", and alternatively replace with a specific "PC7 review clause" to apply by 31 December 2025 or thereafter, on any replacement water permit to address the relevant provisions of the new operative Land and Water Regional Plan. Note that all replaced deemed permits will become water permits.	PHS supports a duration of consent of 'no more than' six years and believe that considerations should not be given to special clauses.	
	71137.08	e) Amend so that it does not apply to any Schedule 1B or 3B water take or any associated water take and to remove reference to "consent duration sought is		

		no more than six years", and alternatively replace with "adoption of a specific PC7 review clause to apply by 31 December 2025 or thereafter".		
Te Ao Marama Submission ID 71147	71147.01, 71147.03	a) Ensure that Schedule 10A.4, 10A.4.3 & 10A.4.4 Methodology for calculating Monthly Volume Limit (m3), is subject to up to date tests regarding reasonable and efficient use of water for all proposed water uses.	PHS supports the need for up to date methodology in relation to testing. This is because the water cycle is expected to undergo significant change due to climate change. <sup>4</sup>	Allow submission and incorporate relative provisions of Te Ao Marama's submission. This includes monitoring and incorporating a planning framework during the transitional period to ensure there are no significant adverse effects during this period. Further, to use the NPSFM 2020 to guide the planning framework for the transitional period that is also consistent and recognises the principles of the Treaty of Waitangi.
	71147.02	b) Ensure that water permits are only granted for short durations whilst the Regional Plan: Water for Otago does not give effect to the National Policy Statement for Freshwater Management 2014 (as amended 2017), so that existing abstraction pressures on waterbodies in the region due to overallocation are not perpetuated for another generation and ngā Rūnanga rights, interests and values are appropriately identified and reflected in longer term freshwater management decisions.	PHS supports a duration of consent of no more than six years. It is important that the Resource Management Act recognises the Treaty of Waitangi to protect Maori and their culture, their traditions with ancestral lands, water, sites, waahi tapu and other taonga. <sup>5</sup>	
	71147.04	c) Retain the intent of Objective 10A.1 to enable an interim planning framework for a transitional period, and ensure that this objective recognises that surface	PHS supports an interim planning framework to assist with the transition from current water permits that expire prior to 31 December 2025, until the new	

<sup>4</sup> Union of Concerned Scientists. Water and Climate Change. <https://www.ucsusa.org/resources/water-and-climate-change#:~:text=With%20climate%20change%2C%20the%20water, every%201%C2%BAF%20rise%20in%20temperature> (accessed September 29, 2020).

<sup>5</sup> Environmental Foundation. Environment Guide: Maori and the RMA. <http://www.environmentguide.org.nz/rma/maori-and-the-rma/> (accessed September 30, 2020).



	71147.05	<p>waterbodies are taonga, gives effect to Ministerial direction, is consistent with and progressing national direction for freshwater management during the transition, and anticipates a future planning framework that gives effect to national direction for freshwater management within the timeframes specified in that national direction.</p> <p>d) Retain the overall intent of Policy 10A.2.1 and ensure that this policy provides certainty during the transitional period that there is no potential increase in adverse effects or pressures on waterbodies from water use, by increasing irrigation area for example, and that there is both a decrease in allocation during this period and more water retained instream where minimum flows are applicable, as a first step towards a future planning framework that gives effect to national direction for freshwater management.</p>	<p>Land and Water Regional Plan is made operative.</p> <p>PHS supports monitoring to assist with the transitional period and ensure there are no adverse effects during the transitional period.</p>	
	71147.06	<p>e) Retain the overall intent of Policy 10A.2.2 and ensure that there is a strong policy leaning towards six year resource consent durations for water permits that captures the majority of applications for water permits so that ngā Rūnanga rights, interests and values are able to be appropriately identified and reflected in longer term freshwater management decisions in accordance with national direction</p>	<p>PHS supports a duration of consent of no more than six years.</p>	

	71147.07	f) Ensure that the wording and intent of Policy 10A.2.3, in combination with other objectives and policies applicable to the transitional period, is consistent with Ministerial direction and national direction for freshwater management, including timeframes for implementing this national direction, and does not result in any potential increase in adverse effects on waterbodies during the transitional period.	PHS supports a transitional period that is guided by and consistent with the NPSFM 2020.	
	71147.08	g) Retain the overall intent of Rule 10A3.1.1 and ensure that the combination of conditions and matters reserved for control within the controlled activity rule, Rule 10A.3.1.1, and the methodology used to establish maximum rates and volumes of abstraction, achieves the intent of Policy 10A.2.1 to reduce allocation and results in reasonable and efficient use of water during the transitional period.	PHS supports monitoring to assist with the transitional period and ensure there are no adverse effects during the transitional period.	
	71147.09	h) Retain the intent of Rule 10A.3.1.2 and ensure that application of the rule is consistent with Ministerial direction and national direction for freshwater management, including timeframes for implementing this national direction, and does not result in any potential increase in adverse effects on waterbodies during the transitional period.	PHS supports a transitional period that is guided by and consistent with the NPSFM 2020.	

	71147.10	(i) Ensure that Schedule 10A.4, 10A.4.1 Methodology for calculating 'Rate of Take Limit', is subject to up to date tests regarding reasonable and efficient use of water for all proposed water uses.	PHS supports the need for up to date methodology in relation to testing. This is because the water cycle is expected to undergo significant change due to climate change. <sup>6</sup>	
	71147.11	j) Ensure that Schedule 10A.4, 10A.4.2 Methodology for calculating Daily Volume Limit (m3), is subject to up to date tests regarding reasonable and efficient use of water for all proposed water uses.	PHS supports the need for up to date methodology in relation to testing. This is because the water cycle is expected to undergo significant change due to climate change. <sup>7</sup>	
Federated Farmers of New Zealand – Otago and North Otago Provinces Submission ID 71177	71177.01-71177.09	a) 'deletions,' 'oppose,' and 'reject.'	PHS opposes this submission to make 'deletions, rejections and to oppose PC7.'	Disallow submission and do not incorporate relative provisions.
Central Otago District Council Submission ID 71178	71178.01 71178.03	a) PC7 should be rejected in its entirety and consents processed under the current framework. b) If permit replacements are not to be processed under the full range of considerations covered in the current	PHS opposes this submission that 'rejects PC7 in its entirety.'  PHS supports the need to supply safe drinking water for all New Zealanders through community supplies. Safe drinking	Disallow the 'rejection' of this submission. However, acknowledge the need to support community water supplies to support population growth. Further, adjust methodology to support the dynamic environment.

<sup>6</sup> Union of Concerned Scientists. Water and Climate Change. <https://www.ucsusa.org/resources/water-and-climate-change#:~:text=With%20climate%20change%2C%20the%20water,every%201%C2%BAF%20rise%20in%20temperature> (accessed September 29, 2020).

<sup>7</sup> Union of Concerned Scientists. Water and Climate Change. <https://www.ucsusa.org/resources/water-and-climate-change#:~:text=With%20climate%20change%2C%20the%20water,every%201%C2%BAF%20rise%20in%20temperature> (accessed September 29, 2020).

		framework during the next few years, then the submitters preference is for existing deemed permits to be extended so they can be considered under the new framework.	water is a fundamental requirement for the public health of New Zealand. <sup>8</sup> Further, PHS acknowledges Central Otago as a growing population and the need to account for this in the amount of community water supply that is available.	
	71178.05	This could either be done by either: (1) issuing short duration consents under the current water plan rules until the new planning framework is ready; or (2) making compliance with terms of existing permits a permitted activity until the new planning framework is ready; or (3) issuing replacement permits on the same terms as existing permits, as a controlled activity, until the new planning framework is ready.	PHS supports CODC's amendments to not include community water supply allowance as the Drinking Water Standards for New Zealand 2005 (Revised 2018), state the requirement to provide safe drinking water to the entire population. PHS supports the need for up to date methodology in relation to testing. This is because the water cycle is expected to undergo significant change due to climate change. <sup>9</sup>	
	71178.07	d) Plan Change 7 should be consistent with the Regional Water Plan which provides for anticipated population growth in community drinking water allowances. Plan Change 7 currently does not provide for this. The methodology for calculating takes and volumes of limits for community water takes should be adapted with this in mind.		

<sup>8</sup> Ministry of Health. Drinking-water Standards for New Zealand 2005 (Revised 2018). <https://www.health.govt.nz/publication/drinking-water-standards-new-zealand-2005-revised-2018> (accessed September 09, 2020).

<sup>9</sup> Union of Concerned Scientists. Water and Climate Change. <https://www.ucsusa.org/resources/water-and-climate-change#:~:text=With%20climate%20change%2C%20the%20water,very%201%C2%BAF%20rise%20in%20temperature> (accessed September 29, 2020).

		d) More recent datasets should be included in the 5 year period for assessing take limits, so long as there is no evidence of intentional wastage.		
Arrow Irrigation Company Ltd Submission ID 71181	71181.01-71181.05	a) The decision maker should reject PC7 in its entirety.	PHS opposes this submission that 'rejects PC7 in its entirety.'	Disallow submission and do not incorporate relative provisions.
Strath Taieri Irrigation Company Submission ID 71182	71182.01-71182.05	a) STIC want the Plan Change to be declined. PC7 will undermine and stall any environmental and economic gains or opportunities for the Upper and Strath Taieri regions for at least the next decade. If PC7 is not declined, then the Upper Taieri should not be included in the Plan Change.	PHS opposes this submission that 'declines this plan change.'	Disallow submission and do not incorporate relative provisions.
Blackstone Irrigation Company Submission ID 71242	71242.01-71242.04	a) Decline the whole of PC7.	PHS opposes this submission that 'declines the whole of PC7.'	Disallow submission and do not incorporate relative provisions.