

# Further submission ORC Water Permits Plan Change

## Submission Reference no: [REDACTED]

Dugald MacTavish, **Wise Response Society Inc (Dugald MacTavish)**

[REDACTED]  
Otago

New Zealand  
[REDACTED]

**Submitter Type:** Not specified

**Source:** Web Form

### Overall Notes:

#### Clause

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

#### Position

I am a person representing a relevant aspect of the public interest. The grounds for saying why I come within this category are explained below.

#### Notes

#### Clause

Please specify the grounds for saying why you come within the category above

#### Notes

Secretary of Wise Response Society Inc who work to support the sustainable management of natural and physical resources in the public interest.

#### Clause

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

#### Position

I wish to be heard in support of my further submission.

#### Notes

#### Clause

If others make a similar submission, will you consider presenting a joint case at a hearing?

#### Position

If others make a similar submission I will consider presenting a joint case with them at the hearing.

#### Notes

#### Clause

1.1 Name of original submitter?

#### Notes

Otago Water Resource Users Group (OWRUG)

#### Clause

1.2 Particular parts of the submission you support/ oppose? Please indicate whole submission or Submitter point ID (e.g. 70005).

#### Notes

Whole submission but particularly reference to 71161.02

#### Clause

1.3 Are you in support of or in opposition to the particular whole/part of the submission as identified above?

#### Notes

We acknowledge the analysis of the existing provisions seeking an alternative and simply wish to comment further on the issues raised and possible other pathways to address interim allocation issues.

**Clause**

1.4 What are your reasons for your support or opposition?

**Notes**

OWRUG is critical of Plan Change 7 as a transition mechanism pending a full review of the water allocation in 2025 under the proposed new Land and Water Plan. In their Appendix A under 6, Water Allocation Policies in the RPW they also identify issues with interpretation of water allocation policies. However, we consider that water users could have avoided PC7 had water users got together as catchments, agreed minimum flows and sought replacement of deemed permits (and other consents to take) to reflect actual usage (as some did). In this context, Policy 6.4.2AA enables the taking of water at higher flows, when adverse critical ecological impacts are less likely. So where existing take can be implemented within the parameters of a supplementary allocation, (perhaps in some cases by adjusting enterprise, irrigation scheduling or storage capacity) consents might be applied for as a supplementary rather than a primary allocation. The RPW states that Policies 6.4.2, 6.4.2A and 6.4.2AA, are all "intended to improve water resource efficiency by reducing unutilised consented primary allocation over time, which will also enable lowering of supplementary minimum flows". Thus, where a switch to supplementary allocation is feasible, it will have the effect of increasing the frequency with which all other water users accessing the supplementary take can access irrigation water. As an alternative to PC7 one of OWRUGs suggestions involves a Review the existing Policies of the RPW. While we are not advocating that the PC7 be declined, should this OWRUG option be followed, an overhaul of Policy 6.4.2, to make it genuinely reflect its own explanation, would solve a perceived problem of over-allocation by avoiding the possibility that the limit could ever be the sum total of all primary allocation consents. At the same time, a rewording of the Policy 6.4.2AA to require granting of any new consent to be as a supplementary allocation where there is an over-allocation of the primary allocation would be appropriate. These two alterations would appear to us to address the primary conflict with the NPSFM.

**Clause**

1.5 Do you seek for the whole/part of the submission to be allowed or disallowed? (select one)

**Notes**

Supplementary comment on the OWRUG submission only

**Clause**

1.6 Is there another submission you would like to make a further submission on?

**Position**

No - I have no further submission points to make.

**Notes**