

**Submission on Proposed Water Permits Plan Change (Plan Change 7)
to the Regional Plan: Water for Otago**
(Form 5, Clause 6 of the First Schedule, Resource Management Act 1991)

Form 5

Submission on publicly notified proposal for policy statement or plan
Clause 6 of First Schedule, Resource Management Act 1991

To: Otago Regional Council

policy@orc.govt.nz

Name of Submitter:

FULL NAME: Isabella May Anderson

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PHONE: [REDACTED]

**This is a submission on the following proposed plan change:
Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water for Otago.**

I wish to be heard in support of my submission.

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

I **could not** gain an advantage in trade competition from this submission.

I **am** directly affected by an effect of the plan change that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

The specific provisions of the proposal that my submission relates to and the decisions I seek from Council are as detailed on the following pages.

SUPPORT/OPPOSE THE PLAN CHANGE:

I **oppose** PC7 entirely and submit that it should be declined. I ask that it be removed completely.

I support the submission made by OWRUG and their supporting documents.

I support the submission made by the Cardrona Water Users and their supporting documents.

DECISION I WANT ORC TO MAKE:

I want the ORC to remove PC7 completely.

I believe that PC7 has been written and notified without proper and reasonable consultation with affected water users.

If the plan is not removed entirely then I would support the options outlined in OWRUG submission to amend the current framework for permit renewal

REASON FOR THE DECISION ON PC7.

I request PC7 be declined for the following reasons:

1. The short term (6yrs) of consent renewal is totally unrealistic from a farming/environmental/planning and banking perspective.
It is inconsistent with the current consents issued and is not cost effective as the same amount of detail and expert advice is required for a 6yr or a 35yr consent. It is inconsistent with the goodwill shown by the farming community in having robust and comprehensive information in RC applications.
2. Having a cap on area irrigated is not supported. There is no reasoned scientific purpose for this and as is currently the case each application should be considered on its individual merits. Water users should not be

constrained from using improvements in technology and advances in farming practice by a set limit on the area allowed to be irrigated.

3. The setting of 2012-2017 as the only years that usage data is accepted from is unscientific as well. Data for water use and crop requirements should be from the best, most recent and most accurate available and should also take into account seasonal differences, variations in land type and use the climate and also management decisions on farm that impact on use. Some takes will have data for longer periods and some will have missing data due to seasonal events using an inflexible data period skews information so that accurate and informed decisions are difficult to make. Therefore each “take” and each property that makes an application should be decided on case-by-case basis with the best data available for their application.
4. The renewal of deemed permits to RC has been a long-term plan with the October 2021 date as the end goal; the farming community has known this and many (including myself) have spent years preparing for renewing our water permits. The individual cost has been huge to date for most water users and catchments. Financing the necessary monitoring and irrigation efficiencies as well as employing relevant experts comes at a huge cost to individual businesses and to have the goal moved now is a breach of the good faith established over the last 20yrs.
5. The assumption that fish passage is essential is ignoring the fact that restricted access to Introduced species (specifically trout) has protected native Galaxiids in many Otago tributaries. The cost of putting them in place (when deemed appropriate) should not be borne by individual farmers or farming groups-if it is in the wider community’s interest to have them in place then support for the implementation should also come from the wider community.
6. Section 32 consultation for this plan change has been severely lacking and had it been conducted properly this plan may not have been implemented at all.

7. Water users were notified of the opportunity to speak to council in January with less than a fortnights notice- then told they had 10mins to state their case. With 24hrs notice this was reduced to 5mins.
8. I attended this “meeting” and found the attitude from the chair towards many of the speakers (some of whom had travelled several hours) and councilors to be disrespectful and absolutely not what I would consider consultation- councilors were unable to clarify any points they did not understand from speakers and most speakers were rushed to finish this was box ticking at its worst. Following this was an “invited only” forum that included only one voice from the farming community and one consultant. This is NOT adequate consultation of affected parties.