



SUBMISSION FORM – Proposed Plan Change 7(Water Permits) to the Regional Plan: Water for Otago

Form 5, Clause 6 of Schedule 1, Resource Management Act 1991

Office use only

Full name of submitter: **Michael David O’Connell**

Name of organisation (if applicable): **Appin Farms Ltd**

Email: [redacted].....

Postal Address (or alternative method of contact): [redacted].....

Telephone: [redacted].....

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

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

Trade competitor’s declaration (if applicable)

I could not (circle one) gain an advantage in trade competition from this submission

I am / am not (circle one) directly affected by an effect of the plan change that

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

Signature of submitter: **M.D. O’CONNELL**.....Date **04/05/2020**.....

Please note that all submissions are made available for public inspection.

State what your submission relates to and if you support, oppose, or want it amended:
(e.g. support rule ‘x’, or amend policy ‘y’)

I very much oppose Proposed Plan Change 7 because

No consideration given for future development of irrigated areas

Allocation being based on usage instead of a paper consent

This is one size fits all approach and not workable

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State what decision you want the Otago Regional Council to make:

(e.g. amend policy 'y' to say....)

Do not proceed with Proposed Plan Change 7 because the proposed plan is a *one size fits all* and unfair

A river relevant plan specific to individual rivers and the users needs should be developed

A far more practical and equitable approach would be to assess all catchments and look at their current & individual characteristics ie minimal flow criteria in place, river health etc

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Give reasons for the decision you want made:

(e.g. I want policy 'y' changed because...)

PPC 7 is not tenable because

- **The current water consent is a really valuable asset for this property; in a changed format it would devalue the farm which has a valid water permit attached to it**
- **It would eliminate the option of planned future development(s) of this property**
- **It is not Shag River specific – it's a one size fits all general concept that allows no consideration of individual catchments and their issues – and it would significantly disadvantage all users in this area**
- **To assess allocation based on 5 year time frame (average 2012-2017) isn't at all fair! It fails to consider/allow for variable climatic conditions etc (eg a very wet summer) which impacts on the amount of seasonal water use**
- **It would further lower the amount of water allowed to be taken from the Shag River (which is already monitored), lower production and decrease land values**

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.....
Please attach any additional information.

SUBMISSIONS MUST BE RECEIVED BY 5.00 PM ON Monday 4 May 2020

Post to Otago Regional Council
Private Bag 1954
Dunedin 9054

Email to policy@orc.govt.nz

Deliver to Otago Regional Council offices at:
▪ 70 Stafford Street, Dunedin
▪ William Fraser Building, Dunorling Street, Alexandra
▪ Terrace Junction, 1092 Frankton Road, Queenstown

Online at www.orc.govt.nz

Please note:

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:

Please turn over

- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.