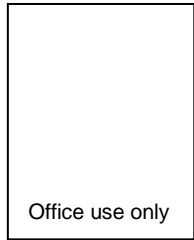




# SUBMISSION FORM – Proposed Plan Change 7(Water Permits) to the Regional Plan: Water for Otago

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



Full name of submitter: Arrow Irrigation Company Ltd

Name of organisation (if applicable):

Email: c/o Nick Geddes: [ngeddes@cfma.co.nz](mailto:ngeddes@cfma.co.nz)

Postal Address (or alternative method of contact):

**Clark Fortune McDonald & Associates  
PO Box 553  
QUEENSTOWN 9348**

Telephone: **4416071**

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 gain an advantage in trade competition from this submission

I am 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:

Date: 05/05/20

(Or person authorised to sign on behalf of person making submission.

Signature not required if you make your submission by electronic means)

**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:**

AIC opposes PC7, specifically, provision 10A.3.2.

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

The decision maker should reject PC7 in its entirety.

**Give reasons for the decision you want made:**

Pursuant to provision 10A.3.2 any activity to take and use surface water for a consent duration in excess of six years is a non-complying activity. AIC submits this length of time does not offer sufficient certainty for any permit holder to enable medium to long term business assessments, economic viability and forecasting.

For these reasons, AIC submits that Plan Change 7 does not accord with, or assist the regional authority to carry out its functions to achieve, the purpose of the Resource Management Act 1991 (the Act);

- i. It does not promote the sustainable management of resources;
- ii. It does not meet section 32 of the Act;
- iii. It is not consistent with Part II of the Act;
- iv. It does not represent integrated management or sound resource management practice;
- v. It does not meet the reasonably foreseeable needs of future generations;
- vi. It does not implement the most appropriate standards, rules or methods for achieving the objectives set out in the Proposed Regional Plan: Water for Otago.

---

**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](mailto: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](http://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:
- 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.