

[Redacted]

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**From:** Otago Regional Council <notifications@engagementhq.com>  
**Sent:** Monday, 4 May 2020 1:00 pm  
**To:** [Redacted]  
**Subject:** Anonymous User completed Submission Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water

Anonymous User just submitted the survey 'Submission Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water' with the responses below.

**Full name of submitter**

Peter Gerald Mcleod

**Name of organisation (if applicable)**

Irrigator and a director of Arrow Irrigation Coy.

**Email**

[Redacted]

**Postal Address (or alternative method of contact)**

[Redacted]

**Phone number**

[Redacted]

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

*(Being 'heard' means speaking at a hearing)*

No

**Could you gain an advantage in trade competition from this submission?**

No

**Are you 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

I am not

**State what your submission relates to and if you support, oppose, or want it amended:**

*(e.g. support rule 'x', or amend policy 'y')*

Policy 10A.2.1.B appears to place a cap on irrigated areas to 2017/18 levels. In the case of Arrow Irrigation Coy (AIC), the steady replacement of irrigated farmland with subdivided lifestyle blocks, results in a less intensive use of water, and the freed up water becomes available for dryland blocks adjoining the existing command area which currently have no access to irrigation water. The proposed policy would not allow that expansion. Policy 10A.2.2 The AIC have invested substantial time and money over the past few years, guided by ORC, preparing a renewal application. We have prepared a comprehensive and solid application on the premise that we would do it once, do it properly, and hopefully come out with a long term renewal, and now, at the last minute, the rules have changed. We are now faced with the increased costs of an extension of monitoring and science programmes associated with obtaining multiple permits. Also under this policy there is no guidance for applications that seek a term longer than 15 years. Rules 10A.3.1.1 Water meters in earlier years were notoriously inaccurate and it is considered the 5yr volume averages would be more accurate from years 14/19 or 15/20 rather than 12/17. Also the methodology in Schedule 10A/4 does not acknowledge any mitigating circumstances such as malfunctioning meters. There is no flexibility for individual situations in the methodology.

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

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

Amend policy 10A.2.1.B. to allow an incremental increase in 17/18 areas (without an increase in abstraction). Amend Policy 10A.2.2 to allow renewal terms of up to 35 years as a complying activity. Amend Rule 10A.3.1.1 to allow flexibility when assessing individual circumstances.

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

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

Reasons stated in 9 above.