



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: John O'Brien

Name of organisation (if applicable): The Burn Limited

Email: ob@obgroup.co.nz

Postal Address (or alternative method of contact):

Telephone: 0274 445 574

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.
(Delete if you would not consider presenting a joint case)

~~Trade competitor's declaration (if applicable)~~

~~I could / could not (circle one) 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: John O'Brien

Date: 4th May 2020

Properties:

- The Burn – 29 Poolburn Moa Creek Road
- Central Park Limited – Lauder Dry Bread Road

(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:

We completely oppose the Plan Change.

I have fully considered the proposed and I believe there is no way this document can be amended as the basic core is not workable. Any continuation to try and make fit for purpose is a misuse of ORC resources.

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

The plan has significant faults and variables which cannot make it a workable option in any form.

The Otago Regional Council needs to ensure they process permits under the existing plan.

Give reasons for the decision you want made:

The Plan totally ignores the community reality of the current situation. PC7 is not workable.

We have made development decisions at significant investment to access the water. These decisions have been made well within the current plan to gain maximum efficiencies. At no stage did we ever get anything but support and encouragement for that investment and direction, from the ORC.

PC7 introduces methodologies in Schedule 10A.4 that are illogical and unreasonable.

Areas irrigated in any one year will alter depending on water availability, the season and crops or pastures grown. Restricting the area irrigated to a year which was 3 years in the past is punitive.

Using water take data from 4 years ago is also poor practice. Taking the average of the maximum volume will lead to the loss of actual abstracted water. That in turn will result in any recent efficiency upgrades from old application methods to centre pivots possibly without water (there appears little logic nor reasoning behind such methodology).

The council needs to take a purposeful look at the good work carried out by the catchment groups. We work with these groups who provide good science-based guidelines.

The ORC needs to listen to the local experts. PC7 is not workable and substandard in its approach to catchment. It lacks practicality, presents discriminatory bias, and cannot in any shape form a usable document.

We ask the ORC to please stand back and work with and value all parts of the community they have been elected to represent.

Water Schemes:

29 Poolburn Road Moa Creek Road:

Ida Valley irrigation Company - Scheme Water Allocation & Surplus water from Bi-wash. Significant investment in irrigation pivots.

Lauder / Dry Bread Road:

Omakau Area irrigation Company Limited Scheme Water Allocation.

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: <ul style="list-style-type: none">▪ 70 Stafford Street, Dunedin▪ William Fraser Building, Dunorling Street, Alexandra▪ Terrace Junction, 1092 Frankton Road, Queenstown
Online at	www.orc.govt.nz