

# ORC Omnibus Plan Change - Plan Change 8

**Submission Reference no:** 28

Mike Riddell (Chair), **Central Otago Environmental Society (Inc.)**



**Submitter Type:** Not specified

**Source:** Email

## Overall Notes:

### Clause

Are you a trade competitor?

### Position

I am a person who would not gain an advantage in trade competition through this submission

### Notes

### Clause

What are you submitting on? You can submit on specific parts of Plan Change 8 or the whole plan change.

### Position

I am submitting on the whole plan change.

### Notes

### Clause

What is your view on the Plan Change 8 or the specific parts listed above? Please select one, if you have multiple views state clearly in the notes box below.

### Position

Multiple views

### Notes

General support with amendments.

### Clause

The reason(s) for my views are:

### Notes

See attached submission

### Clause

What decision would you like the Environment Court to make?

### Position

Approve the plan change with amendments

### Notes

See attached submission

### Clause

The reasons form my view and/or any amendment(s) I am seeking are:

### Notes

Concern about over-allocation of water and degradation of water in relation to natural waterways.

### Clause

Do you wish to be heard in support of your submission? All submissions will be considered by the Environment Court. Please indicate if you wish to be heard in support of your submission.

### Position

I wish to be heard in support of my submission

**Notes**

A member of COES would like to be heard.

**Clause**

Please indicate your choice(s) below. If you do not indicate your intention to call experts, you can change your mind later and decide to call experts to give evidence in relation to your submission, provided you do so in time to meet any procedural direction the Environment Court might make.

**Position**

If others make a similar submission I/we would consider presenting a joint case with them at a hearing

**Notes****Clause**

Authority to act:

**Position**

I confirm I have the authority to sign this submission on behalf of the submitter

**Notes**

## Submission to EPA on ORC Omnibus Plan Change (Plan Change 8 & 1)

### Submitted by: Central Otago Environmental Society (COES)

Chair: Mike Riddell, [REDACTED]

Secretary: Jillian Sullivan, [REDACTED]

Website: [www.coenvironmentalsociety.org](http://www.coenvironmentalsociety.org)

1. We are a community organisation whose objectives are as follows:
  - a. The protection and preservation of the natural landscape and character of Central Otago. This covers many values including landscape, amenity, aesthetic and Central Otago's endemic flora and fauna.
  - b. Raising awareness of issues concerning the natural landscape, heritage and resources of Central Otago with the wider public.
  - c. To encourage and support the Government, the Central Otago District Council, the Otago Regional Council, the Department of Conservation and other statutory authorities as appropriate, to establish policies and make decisions which will preserve and enhance the special character of Central Otago's landscapes, heritage and resources for the benefits of future generations.
2. As a community group dedicated to the preservation of the natural environment, we have particular concerns regarding the degradation of the unique biosphere of Central Otago. Many of the drivers of this diminishment of the ecological balance have been due to the intensification of agricultural enterprises, together with excessive water takes from natural waterways. Such activities have been unrestricted by the necessary regulatory frameworks which have been overseen since 1991 by the Otago Regional Council (ORC). COES is frustrated that the issues responsible for environmental decay have been well known for the last three decades, and yet little monitoring or regulation has been implemented by the ORC.
3. As such, we have been involved in discussions with the ORC in relation to issue concerning the over-allocation of water resources in the Otago area, and pollution of our natural waterways.
4. While we are supportive in general of the measures outlined in the notified plan change, we have certain reservations. We commend the overall intent to address deficiencies in the ORC current operational water plan (Water for Otago – RPW).
5. However, it is not apparent whether such modifications are short term, or whether they are intended to form part of the upcoming Otago Land and Water Regional Plan (LWRP), to be implemented by 2025. We submit that the measures in the RPW should be carried over and included in the LWRP where relevant. We note particular measures as follows:
6. Urban discharges. We submit that regulatory limits be specified in relation to both stormwater and sediment discharge from urban development, and that existing

stormwater discharge systems are progressively upgraded to meet such regulatory limits.

7. Sedimentation in agricultural operations. It is apparent to COES that intensive farming of areas proximate to natural waterways is a significant cause of water pollution. We therefore suggest setbacks from waterways be mandated in areas which are classified as source areas for waterways. The distancing of setbacks should be cognisant of the intensity of grazing and the gradient of land adjacent to waterways. Intensive grazing should not be permitted in areas which are regarded as critical source regions.
8. Good farming practices policy (7.D.9). While commending the proposed measures, COES seeks that these are regulated rather than encouraged. In particular, that stock must be excluded from critical source areas; and that good farming practices are mandated in relation to the identification and management of critical source areas. Farming activities must be cognisant of and required to operate within environmental tolerances.
9. The ORC has a role to play in assisting farm operations to transition to new regulatory provisions. Plan Change 8 should specify the intention of ORC to assist in identification of critical source areas, and of topographical conditions related to runoff in specific properties.
10. While we maintain that sediment should be stopped at source, sediment traps as proposed in PC8 might improve water conditions in waterways. COES is therefore supportive of these provisions in the medium term.
11. Stock exclusion limits in PC8 should be no less stringent than those proposed in the Action for Healthy Waterways Action Plan, as now implemented.
12. COES supports the measures for animal waste storage and dispersal.
13. We are also supportive of minimum standards for new landfills and stronger measures in regard to dust suppressants and waste oil.
14. Importantly, COES believes the provisions of Plan Change 8 and Plan Change 1 be considered in the light of the LWRP development process. With the advent of the current NPSFWM and its overarching concepts such as Te Mano o te Wai, it is imperative that short term regulations are evaluated in keeping with the aims of the NPSFWM and be conformed to that wider process.
15. In summary, COES supports the major provisions of the Omnibus Plan, while calling for certain areas of it to be strengthened through a regulatory framework, to ensure no further degradation of waterbodies, and water quality improvements for impacted water bodies in the short term.