

[Redacted]

From: Otago Regional Council <notifications@engagementhq.com>
Sent: Friday, 1 May 2020 9:24 am
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

Terry Jack Davis

Name of organisation (if applicable)

Coburns Partnership

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)

Yes

If others have made a similar submission, would you consider presenting a joint case with them at a hearing?

Yes

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

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 oppose the Proposed Plan Change 7

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

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

The ORC should throw out the PPC7

Give reasons for the decision you want made:

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

Very simply the 6 year term is inadequate to justify investment in infrastructure to enable more efficient irrigation systems. The discouragement of developing more area for irrigation is unacceptable. In our situation we could use less water than we are currently, vastly improve our irrigation systems and the environment would be enhanced (through planting of trees and regenerative pastures). Further reasons to throw out PPC7 The key principles behind the plan change (as copied from the ORC website) state: The focus must remain on the bigger picture – the Water Plan review. The Water Permits Plan Change should be as concise as required to achieve a fit-for-purpose management regime. Water allocation should be based on water use not paper allocation. Consideration of potential impacts on existing water abstractors, and existing priorities in deemed permits. Efficiency of time and cost for both Council applicants and other parties. Opportunities for data gathering that will inform the Water Plan review should be pursued. If we break this down we see the key principles have not been adhered to. 'The focus must remain on the bigger picture – the Water Plan review.' PPC7 in fact detracts from the Water Plan review. 'The Water Permits Plan Change should be as concise as required to achieve a fit-for-purpose management regime.' PPC7 is neither concise or fit for purpose. 'Water allocation should be based on water use not paper allocation.' PPC7 discouraging development seems contrary to this point. 'Consideration of potential impacts on existing water abstractors, and existing priorities in deemed permits. PPC7 seems to miss this point completely. 'Efficiency of time and cost for both Council applicants and other parties.' PPC7 with the 6yr term is in direct contradiction to this point. 'Opportunities for data gathering that will inform the Water Plan review should be pursued.' PPC7 seems to disregard this point in favour of data solely from 2012-2017. Thanks very much for considering my submission.