



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: Geoffrey Robert Crutchley

Name of organisation (if applicable):

Email: [redacted]

Postal Address (or alternative method of contact): [redacted]

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Telephone: [redacted]

I **wish** to be heard in support of my 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 not gain an advantage in trade competition from this submission

I am not 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:

(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:

I oppose Plan Change 7 generally because I believe it will result in outcomes far short of those we may expect under the existing plan. Specific issues as follows.

The issue of short-term consents as proposed will seriously curtail development opportunities for the region, having far reaching negative effects on the lives of residents.

Existing allocations will be unreasonably reduced in both rate of take and volume under the averaging provisions described, causing damage to existing businesses and the community with no evidence that this might offer benefit to the environment.

Discouraging increase in irrigated area is contrary to efficiency and “best use” objectives

Justification for this plan is based on flawed assumptions/beliefs such as, intensive land use is somehow linked to the exercise of deemed permits, over-allocation causes low river flows and this problem is best addressed by reducing allocation limits. None of these assumptions is true.

These misapprehensions could have been remedied during an adequate consultation process. The claim made in the evaluation report that this plan will not reduce the value of existing takes is false, as the process described by which allocation will be determined is a classic "sinking lid" method which will ensure that when water is most needed it will be denied. 10A.2.1 specifically states "avoid granting a consent except where there is a reduction in the allocation". No rationale is offered for this, and it allows for no consideration of other mitigating factors, including efficiency of use.

The opportunity to address these issues is now further impeded by the current national health crisis, which although entirely unrelated will impact on the process, on the affected communities and on regional priorities. The Council should be concerned by this

The Council needs to accept that responsibility for the delay in implementing the current plan and meeting the 2021 deadline rests with the Council. They must ensure that the consequences of this failure are not borne by others. Preservation of the status quo should be the least that is afforded to affected parties while the Council gets this sorted.

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

In catchments where minimum flow settings are in place, (such as the Taieri) applications for renewal of Deemed Permits should proceed under the existing plan.

In catchments where minimum flows have yet to be established, the status quo should be determined, and maintained while this work is completed.

This should be achieved through the issue of non-notified interim consents based on evidence of use and historic rate and volume of take. There should be no averaging of maximum records, because seasonal supply and demand is highly variable for a host of reasons. Evidence of take should be matched with the irrigated area, based on Aqualink estimates of rainfall deficiency for the location and having regard for alternative sources.

Evidence collected for this purpose and any associated council documents should be retained for use in any subsequent process for issue of a longer-term consent

Give reasons for the decision you want made:

The primary justification for Plan Change 7 is the need to provide time for the Council to complete work which should have been done before now. The Plan as proposed goes beyond that objective, imposing restrictions without evidence of need to restrict, and lacking heed to the destruction it will wreak on innocent parties

The plan is an expression of a negative attitude to irrigation generally and evidences belief in dubious claims and outright falsehoods presented to, and apparently accepted by the Skelton inquiry

I do not hold or benefit from any deemed permit, but I am offended by the injustice that this plan would inflict on other individuals and communities

It fails to meet the test that in this circumstance the ORC should "First do no harm"

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

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

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.