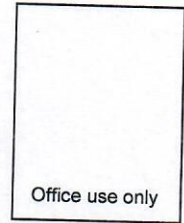




SUBMISSION FORM – Proposed Plan Change 7(Water Permits) to the Regional Plan: Water for Otago

Form 5, Clause 6 of Schedule 1, Resource Management Act 1991



Full name of submitter: Mike Scurr.....

Name of organisation (if applicable): JIT Hillend Investments Ltd.....

Email: mike@hillendstation.com.....

Postal Address (or alternative method of contact): RD2, 268 Cardrona Valley Road, Wanaka.....

Telephone: 0274777151.....

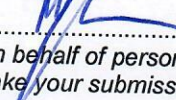
I wish ~~I do not wish~~ (circle preference) to be heard in support of my further submission.

Trade competitor's declaration (if applicable)

I could / could not (circle one) gain an advantage in trade competition from this submission

I am / am not (circle one) 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: 3/5/2020
(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:
(e.g. support rule 'x', or amend policy 'y')

My submission relates to Plan Change 7 to be heard in the Environment court.

I am opposed to the plan change in its entirety and want council to process replacement deemed permits under the current operative water plan. (with amendments if necessary)

A six-year term is not realistic for a water consent considering the time and expense required to process under the existing plan and/or the PC7.

State what decision you want the Otago Regional Council to make:
(e.g. amend policy 'y' to say....)

Otago Regional Council (ORC) needs to amend (if necessary) the current operative water plan to allow for replacement deemed permits to be issued for a full 35-year term.

Alternatively, ORC reads the "Skelton Report" more thoroughly as well as understanding the recommendations of the Minister in his section 24A report that states;

"I would encourage you to consider a narrow plan change that provides for the relatively low cost and fast issuing of new consents on a short-term basis, as an interim measure until sustainable allocation rules are in place."

It would be fair to assume the Ministers recommendation was in response to Prof Skelton's advice to extend the term of the deemed permits by way of legislative change to enable the NPSFM to be implemented before expiry of deemed permits.

I quote from Prof Skelton:

"I consider that the only way to ensure that new and replacement consent applications will be assessed under the new planning framework is to defer the expiry date for deemed permits in Otago to a period when it can reasonably be expected that the new land and water plan will be in place".

Give reasons for the decision you want made:
(e.g. I want policy 'y' changed because...)

The capital outlay for processing a six-year consent and the associated infrastructure upgrade is prohibitive.

These upgrades are necessary to mitigate possible reductions in supply and timing of supply (minimum flow restrictions) of irrigation water.

No businessperson would consider or be expected to consider the financial risk of a short-term consent with no guarantee of what conditions and restrictions could be placed on the subsequent consents required to continue irrigating. There is no guarantee that our new regional water plan will be operative prior to 2025 and no provision in PC7 to extend the short-term consent.

PC7 does not provide the solutions to the shortfalls in our current water plan and is speculating on the content of the NPSFM that is still five years or more from becoming operative.

Do not over complicate a very stressful process for some of our most vulnerable farmers when there are obvious pathways to allow for more time to complete a "fit for purpose water plan".

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;

Please turn over