



# 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: Lyndon Strang, Chairman .....

Name of organisation (if applicable): Kakanui Water Allocation Committee .....

Email: [redacted] .....

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

Telephone: [redacted] .....

I wish to be heard in support of my further submission.

**Trade competitor’s declaration** (if applicable)

I could not gain an advantage in trade competition from this submission

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.**

**Introduction**

When Plan Change 7 was first proposed it was understood that its intention was as a mechanism to allow more time to deal with the significant number of deemed permits due to transfer to modern RMA consents. In its current form it has spread to include all water permits up for renewal before 31 December 2025.

The Kakanui Water Allocation Committee feel strongly that we have unfairly and unnecessarily become a victim of someone else’s problem. We wish to go through a proper consent renewal process once based on over 25 years of data and good management of our shared resource.

We understand the environmental challenges in our river and want to work constructively with the ORC and other stakeholders on a longer term solution. We want to do this once and do it well not via a rudimentary stop gap measure then again in less than 6 years.

ORC has not reassured or modelled that the PC7 process will be a “simple interim consent” or inexpensive for current water permit holders. We then have to assume that we will need to enter into an expensive and stressful consent renewal process twice within 6 years. This is not only inefficient for consent holders but equally as costly for ORC and other stakeholders.

It is not in the best interest of our environment or the people of our region to pursue this approach.

**Our Situation**

For over 25 years irrigators on the Kakanui and Kauru Rivers have held modern RMA permits based on a river with a seasonal minimum flow regime. Our consents all have instantaneous rates and monthly/annual volume

allocation. These consents are all monitored using real time telemetry with ORC from periodically audited flow meters.

Our consents have conditions on community consultation which we proactively manage. In the last year we have been proactive in the implementation of a farmer let catchment group through NOSLAM. We are looking at low Nitrogen GMP's, alternative landuses and riparian enhancement understanding the need for improvements in these areas.

In 2024 the majority of primary consents on the Kakanui river come up for renewal. In preparation for this the KWAC met with ORC in late 2019 to discuss our next steps indicating that we wanted to start an early collaborative approach to our consent renewals. It has been our desire to this once and do it right with a full consultation process with other stakeholders and an allocation framework that gave us certainty into the future.

This certainty will allow us the time to continue to invest in our on farm infrastructure to improve water use efficiency and reduce our environmental foot print.

We thought we were doing everything and more required off us.

**Our submission is that:**

**Policy 10A.1.1,10A.2.1 - We oppose the inclusion of water permits which expire prior to 31 December 2025.**

We recommend the following option:

A continuance/rollover be granted to these consents to allow them to be dealt with under the new Otago Land and Water Plan. This would be a rollover of less than 12 months in relation to the Kakanui consents. It would result in a better outcome for the environment and our community as well as saving all parties significant costs.

In a river such as the Kakanui with a minimum flow regime, good consent management and many years of historical data reissuing of consents assuming the status quo (current instantaneous and monthly takes) for six years is preferable to the mechanism proposed in 10A.3.1.1.

Maintaining the status quo of consent allocation for an extended period (6 years) will insure the continued good management of the river without disruption. This will allow irrigators to put a focus during this period, on implementing new regional and national requirements for fresh water management that will be coming into force as well their own proactive environmental and on farm changes.

The allocation regime on the Kakanui is fit for purpose in its current form.

## **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	<a href="mailto:policy@orc.govt.nz">policy@orc.govt.nz</a>
Deliver to	Otago Regional Council offices at: <ul style="list-style-type: none"><li>▪ 70 Stafford Street, Dunedin</li><li>▪ William Fraser Building, Dunorling Street, Alexandra</li><li>▪ Terrace Junction, 1092 Frankton Road, Queenstown</li></ul>
Online at	<a href="http://www.orc.govt.nz">www.orc.govt.nz</a>

### **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.

- *6 year consent too short*
- *Cost of consent process for only 6 years – to renew twice*
- *Only just falling short of 2025 renewal date*
- *Unnecessary process for consented permits like the Kakanui – all data available of water use.*
- *Successfully managed river for ... years.*
- *Water use period 2017/2018 too limited – may reward the poor use of irrigation, not efficient users.*
- *Support dealing with deemed permits, stagger renewal of consented users*