



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: Keith Cooper

Name of organisation (if applicable): Littlebrook farm Limited

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I wish **do not wish** (circle preference) to be heard in support of my further 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 **could not** (circle one) gain an advantage in trade competition from this submission

I 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: 4 May 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')

I own a farm that has a deemed permit (3701) which is due to expire in 2021
 I purchased the property in 2011 on the basis of knowing the expiry date and the envisaged process to obtain a new consent, based on historically granted consent periods, which gave me confidence that in due course I would be able to apply and for a new consent for an economically viable period – not 6 years . I subsequently purchased two adjoining properties to create scale and drive efficiencies with a view of sharing the existing water volumes over a wider area to create options to utilise the land differently between seasons.
 We also invested in the water storage dam, a new pumping system ,fully compliant water measurement equipment, underground pipe work for the water race that feeds the dam and fenced waterways for environmental management. The next stage was to upgrade the water delivery infrastructure to adopt best practice water usage - the economic viability of such investment goes well beyond 6 years.

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

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

There was a clear process that had been shared with permit holders over circa 18 months supported by workshops and literature . It could be argued there was a combination of pressure /coercion by the ORC to get applicants to have applications for conversion in promptly and early with frequent reminders as to cut off dates and the implications of these timelines if not met.

We do not accept there is any valid reason to now change the process given the commitment we and the ORC have made to the ORC promoted process and therefore we believe the ORC needs to reject the proposed change and continue with the process as is and if the timeline cannot be achieved then existing rights prevail until such time the existing process is concluded, which is how most, if not all Resource Consents operate.

Give reasons for the decision you want made:

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

We and other deemed permit holders have formed a water management group in the Strath Tairei which has proved very constructive, for the previously proposed process but also for the wider water management in the area which also includes those with existing Resource Consents.

We have collectively engaged consultants and invested our own time which is not inconsiderable into our joint application for conversion of our deemed permits which was submitted in advance of the required timeline (as encouraged by ORC) and included extensive engagement with affected parties – all at considerable financial cost to all applicants.

We did this in good faith and aligned with the process and encouragement received from the ORC. The original process was challenging to say the least and took many some time to embrace -but we did so. To now have new rules and requirements for whole new process is grossly unfair and means many of us will be forced to hold back from making future business decisions on our significant investments regarding infrastructure investment to enable productivity improvements.

This all feels very counter-productive and counter intuitive in any scenario but more so, given the Covid 19 environment.

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: <ul style="list-style-type: none">▪ 70 Stafford Street, Dunedin▪ William Fraser Building, Dunorling Street, Alexandra▪ Terrace Junction, 1092 Frankton Road, Queenstown
Online at	www.orc.govt.nz

Please note:P

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.

Please turn over