



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: Emma Crutchley

Name of organisation Maniototo West Side Irrigation Company Ltd.....

Email: [REDACTED]

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

.....

Telephone:

I **wish** 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:

(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’)

We oppose those parts of Plan Change 7 which

- limit the length of the consent to be allowed,
- limit the area to be irrigated
- reduce the size of the allocation

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

(e.g. amend policy ‘y’ to say....)

We wish the Council to proceed with applications under the existing plan where minimum flows are in place.

We want the council to issue interim consents where there is no established minimum flow to allow the status quo until this has been remedied.

We want the council to issue these consents with a minimum of inconvenience and cost to the applicant. This will mean using the best information available in a non-notified process and any documents and information used should be retained for use in subsequent longer term applications.

We want reference to the size of the irrigated area to be removed from the proposed plan change.

We want those clauses requiring a reduction in the size of the allocation to be removed.

Give reasons for the decision you want made:

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

We want these changes because

There is no valid case for reducing the term of the consent where minimum flows are operative. Minimum flows were set through rigorous consultation to allow for aquatic ecosystems and natural character of water bodies while providing for sustainable water use.

Irrigators should not be penalised in areas where minimum flows have not been established by the Otago Regional Council in a timely manner. The Council is responsible for this situation and the status quo should apply until it is remedied. The Council should make every effort to minimise costs and inconvenience to those affected because the failure to be prepared for the transition sits firmly with the Otago Regional council

Limiting the size of the area irrigated discourages water use efficiency. For example, If the same amount of water can be spread over a greater area with better infrastructure and/or storage that is more efficient and should be encouraged.

Reducing the size of the allocation without demonstrating the need to (evidence) indicates a careless bias with no justification.

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.