

# ORC Water Permits Plan Change

Submission Reference no: 31

Peter and Marilyn Morrison



**Submitter Type:** Not specified

**Source:** Email

**Overall Notes:**

**Clause**

Are you a trade competitor?

**Notes**

see submission

**Clause**

If you are a trade competitor, please select one of the options below:

**Notes**

see submission

**Clause**

What are you submitting on? You can submit on specific parts of the plan change or the whole plan change.

**Notes**

see submission

**Clause**

What is your view on the matter or the specific parts listed above? Please select one, if you have multiple views state clearly in the notes box below.

**Notes**

see submission

**Clause**

What decision would you like the Environment Court to make?

**Notes**

see submission

**Clause**

Do you wish to be heard in support of your submission? All submissions will be considered by the Environment Court. Please indicate if you wish to be heard in support of your submission.

**Position**

I do not wish to be heard in support of my submission

**Notes**

**Clause**

Authority to act:

**Position**

I confirm I have the authority to sign this submission on behalf of the submitter

**Notes**

[REDACTED]

---

**From:** Pete Blondie [REDACTED] >  
**Sent:** Friday, 14 August 2020 2:14 pm  
**To:** ORCplanchanges  
**Cc:** [REDACTED]  
**Subject:** Proposed Plan Change 7 to the Regional Plan: Water for Otago

**Subject:** Proposed Plan Change 7 to the Regional Plan: Water for Otago

Name of submitter: P J & M J Morrison

The specific provisions of the proposal that our submission relates to are:

- \*The replacement of deemed permits with water permits
- \*The replacement of expiring surface water takes and use permits
- \*Consent duration on all water permits to take and use water

My Submission is that:

\*The plan change is an unjustified extension of the scope recommended by the Ministers Direction for providing a consenting framework for the expiring deemed permits. PC 7 seeks to reduce allocations, not “hold the line”. Further , it prevents any further irrigation of land, regardless of whether such irrigation would result in a more efficient use of water.

\*The plan change unfairly impacts permit and consent holders as it reduces a consent holders water allocation without the backing or evaluation of robust science or hydrological modelling. The two-tier activity status provides no flexibility at all.

\*The level of detail within the s32 analysis, does not correspond with the scale and significance of the environment, economic and social effects that are anticipated from the plan change. In particular ,the plan change is not supported by any technical assessments to validate the environmental, economic and social impact assumptions that are made.

\*The plan change will halt any future horticulture expansion in Otago.

We seek the following outcomes:

\*An efficient ,effective and fair regulatory framework that provides for greater security for the Otago region and horticulture.

\*An objective, policies and method for an interim framework that provides for longer term(20 years) replacement of permits with review conditions, without “clawing back” allocation or preventing irrigation of land uses prior to a new land and water plan framework that gives effect to the NPSFM.

We do not wish to be heard in support of this submission.

If others make a similar submission, we will consider presenting a joint case with them at a hearing.

Yours faithfully

Peter and Marilyn Morrison

[REDACTED]

Sent from [Mail](#) for Windows 10