

ORC Water Permits Plan Change

Submission Reference no: 54

Philip Murray



Submitter Type: Not specified

Source: Email

Overall Notes:

Clause

Are you a trade competitor?

Position

I am a person who would not gain an advantage in trade competition through this submission

Notes

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 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



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: Philip Murray

Name of organisation (if applicable):

Email: [redacted]

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

.....

Telephone: [redacted]

I **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 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')

Wish Plan Change 7 to be amended:

.....

.....

.....

.....

.....

.....

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

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

Make clear in this plan change that the current proposed LWRP does not apply and that decisions around granting short term permits, either to replace deemed permits or expired permits, will be consistent with achieving the outcomes sought under the NPSFWM.

.....
.....
.....
.....
.....

Give reasons for the decision you want made:

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

Water quality in the Manuherikia River has been steadily deteriorating over recent decades. The cause is likely to have been a combination of the level of water take for irrigation and the intensification of land use. A report by Professor Peter Skelton has concluded that the proposed LWRP is not fit for purpose and requires significant improving.

I am a resource management consultant who has worked in the area of land use management in rural areas for over 30 years. I have serious concerns about the current effects based approach to managing discharges and the effects from changes in land use and intensification, particularly in the Manuherikia and Taieri catchments. This approach has failed to protect aquatic ecosystems from predictable effects of changes to land use and intensity simply because it has allowed these changes to occur without the ability to either monitor the actual discharges occurring or to know who the actual exacerbators are. An over reliance on self-monitoring using the Overseer model has proved inadequate.

Plan Change 7 reads like it is a temporary halt to 'business as usual' when it needs to project to holders of deemed and expired permits that interim decisions on their applications will be considered in the light of the outcomes sought by the NPSFWM. Given the lack of information on the aquatic ecosystems in these rivers and the effects of current and future land use, decisions granting in short term permits should be precautionary.

.....
.....
.....
.....
.....

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.