

ORC Water Permits Plan Change

Submission Reference no: 15

Pete Bennie, **PM Bennie Partnership (Pete Bennie)**

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

Please see attached

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.

Position

See submission

Notes

Clause

What decision would you like the Environment Court to make?

Notes

Please 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

Please indicate your choice(s) below. If you do not indicate your intention to call experts, you can change your mind later and decide to call experts to give evidence in relation to your submission, provided you do so in time to meet any procedural direction the Environment Court might make.

Position

If others make a similar submission I/we would consider presenting a joint case with them at a hearing

Notes

Clause

Authority to act:

Position

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

Notes

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 5 August 2020 10:52 am
To: ORCplanchanges
Subject: FW: Water Submissions
Attachments: Water Submissions 5.8.20.pdf

From: [REDACTED]
Sent: Wednesday, 5 August 2020 10:43 AM
To: ORCplanchanges@epa.govt.nz.
Cc: [REDACTED]
Subject: Water Submissions

Hello,

Please find attached three submissions to PC7.

The submissions are from:

- Aepurist International,
- Leaning Rock Cherries Ltd, and
- **PM Bennie Partnership**

I do not wish to be heard in support of these submissions and I support the submission made by Horticulture New Zealand.

Regards,

Pete Bennie



Virus-free. www.avg.com

To: The Environmental Protection Agency
C/- ORCplanchanges@epa.govt.nz.

Proposed Plan Change 7 to the Regional Plan: Water for Otago.

Name of Submitter: PM Bennie Partnership

This is a submission on the following proposed plan: Proposed Plan Change 7 to the Regional Plan: Water for Otago.

I could not gain an advantage in trade competition in making this submission.

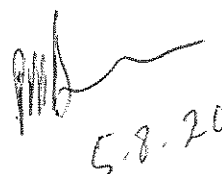
The specific provisions of the proposal that my submission relates to are:

The proposed interim regulatory framework of objective, policies and rules to manage:

- the replacement of deemed permits with water permits,
- the replacement of expiring surface water takes and use permits, and
- 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 Minister's Direction for providing a consenting framework for the expiring deemed permits. PC7 seeks to reduce allocation, 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 dates 2017-2018 (for irrigated land area and 2012-2017 (rate of take for the volume of water taken) will prejudice those who have expanded their operations post 2017/2018.
- The level of detail within the s32 analysis does not correspond with the scale and significance of the environmental, economic and social effects that are anticipated from the implementation of 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.
 - There is an absence of policy assessment. The assessment simply lists the relevant provisions and then defers assessment to future plan review processes.
 - The environmental, economic and social benefits and costs have been inadequately identified and assessed.
- The Plan Change will result in recent horticultural expansion in Otago not being able to be consented and it will halt any future expansion.
- The assessment fails to consider the impact of the proposal on food security.


5.8.20

- The Plan Change will prevent land use changes that could be made to farming systems in the next ten years that will be critical in achieving the long-term climate and water quality outcomes. Farmers need options so they can respond to the challenges now.
- The Plan Change will impact the ability of Otago to manage, and then recover from, the Covid-19 recession.

I 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 methods for an interim framework that provides for longer term (20 year) 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.
- My operation is located [REDACTED] and we organic apples.
 - My operation includes 7ha of irrigated land. We have expanded irrigation across 7ha's since the 2017/18 planting season.
 - Plan Change 7 is likely to affect my business in the following ways:
 - Not being able to irrigate.
 - Not being able to use water for frost fighting.
 - I will not be able to keep the trees and soil at their optimum to produce export or NZ Grade quality apple crops.
 - Significant loss of profits.
 - Staff would lose their jobs.
 - I would be forced cease operation and sell up.

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

I support the submission made by Horticulture New Zealand.

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

Signature of submitter



Dated: 5-8-20

Address for service: [REDACTED]

Tel: [REDACTED]

Email: [REDACTED]