

[Redacted]

From: Otago Regional Council <notifications@engagementhq.com>
Sent: Thursday, 9 April 2020 9:31 am
To: [Redacted]
Subject: Anonymous User completed Submission Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water

Anonymous User just submitted the survey 'Submission Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water' with the responses below.

Full name of submitter

Chris Pritchard

Name of organisation (if applicable)

NA

Email

[Redacted]

Postal Address (or alternative method of contact)

[Redacted]

Phone number

[Redacted]

Do you wish to be heard in support of your submission?

(Being 'heard' means speaking at a hearing)

No

Could you gain an advantage in trade competition from this submission?

No

Are you 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

I am

State what your submission relates to and if you support, oppose, or want it amended:

(e.g. support rule 'x', or amend policy 'y')

The plan change and s32 analysis does not take into consideration the numerous number of suction dredges operating in Otago that are consented claims approved by NZPAM and NZMBIE. The proposed changes do not take into consideration the fact that suction dredging is non consumptive activity and forces these activities into a non-complying pathway. By forcing these non consumptive activities down the path of being a non-complying will mean greater cost and regulatory control on a said activity while at the same time having no environmental benefit.

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

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

Make non consumptive activities like suction dredging as a permitted or controlled activity and increase the consent for these takes longer than 6 years ie 10 years

Give reasons for the decision you want made:

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

Your plan change does not take into consideration non consumptive activities that have no impact on the environment but require a resource consent. It is completely counter intuitive to force a non-consumptive take via a non-complying consent process and require a maximum duration of 6 years. By adopting the proposed plan change beside not achieving the environmental benefits you seek will also increase the regulatory costs within the ORC itself as well as alienating the suction dredging industry. This will force some operators to work outside the parameters you see to create which doesn't benefit anybody.