

ORC Water Permits Plan Change

Submission Reference no: 20

Tom Scott, **Southern District Health Board**
Public Health South, Southern DHB, Private Bag 1921
Dunedin 9010
New Zealand
Ph: 03 4769746
tom.scott@southermdhb.govt.nz

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.

Notes

Please see attached

Clause

What decision would you like the Environment Court to make?

Notes

Please see attached

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

RE: Submission: Public Health South, ORC Plan Change (Omnibus);

Tom Scott <Tom.Scott@southerndhb.govt.nz>

Tue 8/09/2020 3:11 AM

To: ORCplanchanges <ORCplanchanges@epa.govt.nz>

📎 1 attachments (143 KB)

ORC Sub PC 7.pdf;

Hi Michaela,

I did indeed save our submission on Plan Change 8 as Plan Change 7 as well as plan change 8. Attached is our correct submission on Plan Change 7.

Take Care and Kind Regards

Tom

Tom Scott | Team Leader - Healthy Environments, Public Health South | Southern DHB ●●●●Private Bag 1921, Dunedin 9054, New Zealand | office: 03 476 9746 | mob: 027 5100062 | fax: 03 476 9858 | tom.scott@southerndhb.govt.nz

Kind – Manaakitanga | Open – Pono | Positive – Whaiwhakaaro | Community – Whanaungatanga



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From: ORCplanchanges <ORCplanchanges@epa.govt.nz>**Sent:** Tuesday, 8 September 2020 12:24**To:** Tom Scott <Tom.Scott@southerndhb.govt.nz>**Cc:** policy@orc.govt.nz**Subject:** Re: Submission: Public Health South, ORC Plan Change (Omnibus);

Hi Tom,

Thanks for sending through your submissions during the plan change period.

I have noticed that the PC7 and PC8 submissions are the same - was that deliberate or a mistake or have I missed something in comparing them? Please let me know. We can discuss a waiver for further information should you need to resubmit a different document, however this would have to be done by tomorrow at the latest.

Feel free to give me a call if that is easier for you - 027 466 4635.

Kind regards
Michaela

ORC Plan Changes Project Team
Environmental Protection Authority

From: Tom Scott <Tom.Scott@southerndhb.govt.nz>
Sent: Wednesday, 5 August 2020 9:53 PM
To: ORCplanchanges <ORCplanchanges@epa.govt.nz>
Cc: policy@orc.govt.nz <policy@orc.govt.nz>
Subject: Submission: Public Health South, ORC Plan Change (Omnibus);

Kia ora koutou.

Please find attached the Southern DHB submissions on ORC's Omnibus Plan Change as lodged by Public Health South.

Nāku iti nei

Tom

Tom Scott | Team Leader - Healthy Environments, Public Health South | Southern DHB 
Private Bag 1921, Dunedin 9054, New Zealand | office: 03 476 9746 | mob: 027 5100062 | fax: 03 476 9858 | tom.scott@southerndhb.govt.nz

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SUBMISSION ON A NOTIFIED PROPOSED PLAN CHANGE UNDER CLAUSE 6 SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991

To: The Environmental Protection Authority

This is a Submission by: Public Health South on behalf of Southern District Health Board

1. This is a submission on the following change proposed to the following plan (the proposal) Proposed Water Permits Plan Change 7 (PC7) to the Otago Regional Council that is being heard by the Environment Court through a process managed on behalf of the Otago Regional Council by the Environmental Protection Authority.
2. Public Health South (PHS) is not a trade competitor for the purposes of s.308B of the Act.
3. The broad reason for these submissions is to provide objective and independent input to promote the reduction of adverse effects on the health of people and communities pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
4. Public Health South (PHS) has statutory obligations for public health within this area under Crown funding agreements between the Ministry of Health and the Southern District Health Board. The Ministry of Health requires public health services to advocate for the reduction of any potential health risks that are due to decisions made by local authorities. This can include making submissions on Proposed Policy Statements, Plans, including Changes or Variations to Changes. The proposal covers matters with potential health effects on people and communities.
5. The specific parts of PC7 to which this submission relates to include:
 - a) The use of an interim framework;
 - b) The volume of water abstracted;
 - c) The duration of resource consents; and
 - d) Allocation methodologies.
6. These provisions are shown in the attached schedule including whether we support, oppose or are neutral regarding the specific parts or wish to have them amended, and our reasons are stated.
7. Public Health South supports the Otago Regional Council in its process to develop a new Land and Water Plan that gives effect to the National Policy Statement on Freshwater. It is recognised the development of this plan will take some time and in the interim it is necessary to provide an interim regulatory framework for the assessment of water permits. In particular, for the assessment of applications to renew:
 - Deemed permits expiring in 2021; and
 - Any other water permits expiring prior to 31 December 2025, the date by which the new Regional Land and Water Plan (LWRP) is expected to be operative.
8. The decision we seek from the Council for each submission point is set out in the attached schedule. Where we seek amendment to the proposals by suggesting new wording to be inserted into the provisions, or seek amendment to the wording of specific parts, this would also cover wording to the like effect which might be consequentially added or amended, we attach in a Schedule how those provisions in the plan change should be adopted or modified.
9. We attach in the schedule how those provisions in the plan change should be adopted or modified.

10. This submitter wishes to be heard in support of these Submissions at any hearing but is not prepared to consider presenting a joint case with other submitters. This submitter is willing to participate in any pre-hearing conferences, or mediation.

Date 6 day of August 2020

Signed  _____

Name: Tom Scott

a person authorised to sign on behalf of Public Health South, Southern District Health Board.

Address for service

Contact person: Tom Scott

Email: tom.scott@southerndhb.govt.nz

Telephone: 03 476 9746

Postal address: Public Health South

Southern DHB

Private Bag 1921

DUNEDIN 9010

SCHEDULE OF SUBMISSIONS BY PUBLIC HEALTH SOUTH

Submission 1

Provision	10A.1.1
<p>Position: Support</p> <p>Submission: PHS supports and commends ORC for a plan change that establishes an interim planning framework to manage new water permits, the replacement of deemed permits and water permits to take and use surface water until the new Land and Water Regional Plan is made operative.</p>	
<p>Decision Requested:</p> <p>Adopt 10A.1.1 in its proposed form</p>	

Submission 2

Provision	10.A.2.1
<p>Position: Support</p> <p>Submission: PHS supports policies that ensure the following exist: permits will be 'valid; there will be no increase in the area under irrigation; no increase in the rate of abstraction and any existing residual flow, minimum flow or take cessation condition is applied to new permits; and there is a reduction in the volume of water allocated for abstraction.' This is important in the interim framework as there will be no increase in the total volume of water abstracted. Public health issues can arise when there are low flows. If there is no increase in the volume of water being abstracted the environmental and public health issues will not increase.</p>	
<p>Decision Requested:</p> <p>Adopt 10A.2.1 in its proposed form</p>	

Submission 3

Provision	10.A.2.2
<p>Position: Support</p> <p>Submission: PHS supports the duration of these resource consents for take of 'no more than six years.' This supports the advice from the Department of Conservation and Nga Runanga, who consider longer-term consents to have environmental effects and are detrimental to mana whenua values.</p>	
<p>Decision Requested:</p> <p>Adopt 10A.2.2 in its proposed form</p>	

Submission 4

Provision	<p>10A.4.1 Methodology for calculating Rate of Take Limit;</p> <p>10A.4.2 Methodology for calculating Daily Volume Limit (m3);</p> <p>10A.4.3 Methodology for calculating Monthly Volume Limit (m3); and</p> <p>10A.4.4 Methodology for calculating Annual Volume Limit (m3).</p>
<p>Position: Support</p> <p>Submission: PHS supports the methodology for calculating the rate of take limits and volume limits.</p>	

It is important that this is taken from historical data of the hydrological years between 1 July 2012 and 30 June 2017.

Decision Requested:

Adopt 10A.4.1; 10A.4.2; 10A.4.3; 10A.4.4 in their proposed form