

ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 108

Lynne Stewart



Submitter Type: Not specified

Source: Email

Overall Notes:

Clause

Are you a trade competitor?

Notes

see submission

Clause

What are you submitting on? You can submit on specific parts of Plan Change 8 or the whole plan change.

Notes

see submission

Clause

What is your view on the Plan Change 8 or the specific parts listed above? Please select one, if you have multiple views state clearly in the notes box below.

Position

Multiple views

Notes

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

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 19 August 2020 4:21 pm
To: [REDACTED]
Subject: FW: submission on Regional Water Plan

[REDACTED]

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From: ORCplanchanges
Sent: Wednesday, 19 August 2020 4:19 pm
To: [REDACTED]
Subject: FW: submission on Regional Water Plan

We have heard back from Lynne, she wants to refer to her submission for PC8/PC1 so I suggest we just have the same text (heading highlighted in email below) and then update all her submissions with the extra text in the bullet points.

From: [REDACTED]
Sent: Wednesday, 19 August 2020 3:33 pm
To: ORCplanchanges <ORCplanchanges@epa.govt.nz>
Subject: RE: submission on Regional Water Plan

Hi Michaela,

For each of the 3 plan changes, Plan Change 7, 8 & 1:

- Are you a trade competitor? *no*
- For plan change 7, plan change 8 & Plan change 1? *refer to my submission below*
- What decision would you like the environment court to make on this plan change? *approve with amendments*
- Do you wish to be heard in support of your submission? *No*

I submit that the operational water plan (Water for Otago – RPW) is inadequate to address such serious issues, and therefore permits issued by the ORC under that plan will consequently not be fit for purpose. Professor Skelton has indicated that such permits must be fit for purpose.

1. National guidance is set out in the National Policy Statement for Freshwater Management (NPSFWM) 2020. That document explains an essential hierarchy of needs to be observed by all local authorities, under the concept of 'Te Mana o te Wai' 1.3 (5) of NPSFWM 2020:

- a. first, the health and well-being of water bodies and freshwater ecosystems
 - b. second, the health needs of people (such as drinking water)
 - c. third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
2. There is a conflict of interest between existing and projected consents proposed to replace 'deemed permits', and the objectives outlined under Te Mana o te Wai. In particular, such existing and projected consents issued before the expiry of deemed permits may well continue a previous over-allocation of water resources by ORC, together with pollution of natural waterways, resulting in the ongoing diminishment of "the health and well-being of water bodies and freshwater ecosystems".
 3. Consequently there may be need for an interim consenting regime to ensure that a fit for purpose framework is anticipated in any consents issued, and that any such consents must be time-limited so that the objectives of NPSFWM 2020 are not subverted through policy which is essentially moribund. Water abstractors have had a 30-year transitional period under the Resource Management Act in which to confront looming change and adjust to it. Any further extension should confront abstractors with the realities of the NPSFWM 2020, rather than enabling environmentally harming practices.
 4. Any proposal to issue consents of up to 15 years risks sabotage of the objectives conveyed in both the Skelton Report and the NPSFWM 2020 by permitting medium-term frameworks that are contrary to the management of water recommended by these documents. If such consents are to be issued by ORC, they must not happen in the absence of conditions that limit the over-allocation and pollution of natural waterways.
 5. Any consents issued going forward must anticipate the full implementation of the NPSFWM in their stated conditions.

It is no longer acceptable to socialise the costs of freshwater management while privatising the benefit to consent holders.

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

Sent: Wednesday, 19 [REDACTED]

Subject: RE: submission on Regional Water Plan

Hi Lynne

I have received your submission bellow, which I see is a submission on all three plan changes. We are processing the plan changes separately, and require certain questions to be asked of submitters (which are detailed in our prescribed form/online form which were on our website during the submission period.)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Can you please separate out which of your Plan Change 1 and 8 submission relates to Plan Change 1 and which to Plan Change 8? Although they are being notified collectively as the Omnibus Plan Change we are processing these separately

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Submission to EPA on ORC Omnibus Plan Change (Plan Change 8 & 1)

Submitted by: Lynne Stewart

[REDACTED]

I am concerned about the over-allocation of water resources in the Otago area, and the pollution of our natural waterways.

- We need surface water abstraction consents to be in line with National Guidance, so that enough water always remains in our Rivers, enough to sustain aquatic ecosystem life , including that of galaxids and eels / tuna. Our environment is our most important asset and we must protect and care for it.
- Each River’s minimum flow must be a measure that is enough to sustain aquatic ecosystem life. This must be worked out before long term consents are issued, therefore making those long term consents already issued invalid .

We need our ORC to require good farming practices that make sustainable use of our natural resources. ORC must work with farmers to achieve them :-

- excluding stock from critical water source areas
- providing secure waste storage
- keeping to minimum standards for landfills

Environment Bay of Plenty (eBoP) , Bay of Plenty's Regional Council , was working with farmers to reduce stock numbers close to waterways over a decade ago. They were working to leave enough good quality water in their waterways so as to sustain aquatic ecosystem life.

With data on Land Useage going back 20 years (from Ag Research), ORC must work with farmers to farm within environmental limits, leaving enough water always in our Rivers, enough water to sustain aquatic ecosystem life , including that of galaxids and eels / tuna. Our environment is our most important asset and we must all protect and care for it making sustainable use of our natural resources.

Our environment is our most important asset. ORC must work with the community to ensure the sustainable use of our natural resources as the future of our beautiful region starts with protecting and caring for it today.

While I am supportive in general of the measures outlined in the notified plan change, commending the overall intent to address deficiencies in the ORC current operational water plan (Water for Otago – RPW). I do have reservations however.

it is not apparent whether such modifications are short term, or whether they are intended to form part of the upcoming Otago Land and Water Regional Plan (LWRP), to be implemented by 2025. I submit that the measures in the RPW should be carried over and included in the LWRP where relevant. I note particular measures as follows:

- Urban discharges. I submit that regulatory limits be specified in relation to both stormwater and sediment discharge from urban development, and that existing stormwater discharge systems are progressively upgraded to meet such regulatory limits.
- Sedimentation in agricultural operations. It is apparent that intensive farming of areas proximate to natural waterways is a significant cause of water pollution, therefore setbacks from waterways must be mandated in areas which are classified as source areas for waterways. The distancing of setbacks should be cognisant of the intensity of grazing and the gradient of land adjacent to waterways. Intensive grazing should not be permitted in areas which are regarded as critical source regions.
- Good farming practices policy (7.D.9). While commending the proposed measures, these must be regulated rather than encouraged. In particular, that stock must be excluded from critical source areas; and that good farming practices are mandated in relation to the identification and management of critical source areas. Farming activities must be cognisant of and required to operate within environmental tolerances.
- The ORC has a role to play in assisting farm operations to transition to new regulatory provisions. Plan Change 8 should specify the intention of ORC to assist in identification of critical source areas, and of topographical conditions related to runoff in specific properties.
- While I maintain that sediment should be stopped at source, sediment traps as proposed in PC8 might improve water conditions in waterways. I support these provisions in the medium term.
- Stock exclusion limits in PC8 should be no less stringent than those proposed in the Action for Healthy Waterways Action Plan, as now implemented.
- I support the measures for animal waste storage and dispersal.
- I also support minimum standards for new landfills and stronger measures in regard to dust suppressants and waste oil.

In summary, I support the major provisions of the Omnibus Plan, while calling for certain areas of it to be strengthened through a regulatory framework.

It is no longer acceptable to socialise the costs of freshwater management while privatising the benefit to consent holders.

Please acknowledge your receipt of this submission

Yours faithfully,
Lynne Stewart

A large black rectangular redaction box covering the signature area.