



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: **HAMISH STRATFORD**.....

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 (*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: ...Hamish Stratford..... Date: May 4 2020....
(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')

We oppose the full PC7 Plan Change.
.....
.....
.....

State what decision you want the Otago Regional Council to make:
(e.g. amend policy 'y' to say....)

We want the plan change to be removed completely. It serves no positive purpose for our town and business.

Give reasons for the decision you want made:

The reasons for the decisions sought by myself (Hamish) are set out in the following pages:

Summary of Submission on PC7

1. This submission relates to Plan Change 7 in its entirety.
2. We oppose Plan Change 7 in its entirety.
3. The key reasons for my submission is;
 - a. Plan Change 7 is not required. The operative Otago Regional Council *Regional Plan: Water for Otago (RPW)* already provides a mechanism for the replacement of deemed permits in a way which ensures long term sustainable management of natural resources.
 - b. There are alternative methods, such as the Manuherikia Limit Setting plan change which would deliver better outcomes for both the environment and water users as opposed to adding a further period of 6 years of uncertainty for the catchment.
 - c. We consider PC7 to be completely unnecessary and will create a significant cost burden in having to proceed through two consenting processes within a 6 year timeframe, which is an inefficient use of resources, that could be better spent on farm efficiencies and environmental improvements.
 - d. Any development to enhance irrigation efficiency becomes unbankable proposition with short term (6 year) consents.
 - e. The PC7 will result in delayed improvement of environmental outcomes because water users are unable to fund irrigation improvements and will be forced to continue to use water less efficiently.
 - f. PC7 disadvantages water users who have already spent large sums of money developing efficient irrigation systems and who are currently improving environmental outcomes. These users will be left with partially redundant irrigation equipment. They will have to yet again change their farm management system which may result lessor environmental outcomes than they currently are achieving. Changing farm management systems will result in less income being able to be generated.
 - g. This protracted process has already suppressed land sales and land values in this area of Central Otago.
 - h. The methodology of using 5 years of metered daily water use data (July 2012 – June 2017) is floundering and will result crops which will fail because they are unable to apply the quantity of water they require at critical periods of their development.
 - i. The method of allocation does not take into account years of high rain fall or years when water users use less water because of flow restrictions.

- j. I Believe PC7 lacks robust analysis and evaluation in the Section 32 Evaluation Report of the methodologies for determining rates and volumes of take based on previous use, including appropriate assessment of whether those rates and volumes will provide sufficiently reliable water supply for effective and efficient irrigation
- k. ORC have conducted poor Consultation and given the wide range of water users who will be impacted by the proposals, I do not consider expectations have been met in this regard.
- l. On 21 November 2019, an ORC media release accepted the Minister for the Environment's recommendations, and it was stated that: *"Chairperson Hobbs emphasises ORC's strong commitment to working alongside the community."* & *"Together, we have a lot of work ahead. It will be absolutely essential that we work with the community every step of the way."*
- m. I believe, as a result of the fast-tracked nature of this process, there has not been enough consultation on PC7 This is particularly so, given the subsequent request by Council to have the plan change 'called-in' by the Minister – taking it further out of local hands and placing it in the hands of a central government process. Further issues with consultation are as follows
- n. An online feedback survey undertaken by Council, a short leading-question survey that did not provide for sufficient free-writing or any real challenging of positions. This type of consultation limited and pre-determines what answers will be received.
- o. A public forum on 7 January 2020 that those who attended the meeting were only allocated a strict 5 minute talking time and were not provided with any ability to ask or answer questions. Many farmers who attended this session travelled up to 3 hours each way and were extremely dissatisfied with what they considered to be "a farce of consultation".
- p. A secret focus group which was based on 'invitees only' with the session to be kept confidential. There was no opportunity for farmers to nominate who could represent them and limiting farmers representation.
- q. The objectives and policies of PC7 do not give effect to Part 2 Resource Management Act (RMA).
- r. PC7 fails to give effect to the National Policy Statement Freshwater Management 2017 (NPSFW).
- s. PC7 also fails to give effect to the Regional Policy Statement.
- t. PC7 should be removed because it will result in a significant loss of income for our farming community with no environmental gain. The "ORC", have already caused a lot of stress and expense on the farming sector in our region and this Plan Change has further exacerbated the situation.
- u. The proposal to issue short term permits for much reduced water allocation for an area that was irrigated one year 3 years ago is a nonsense. Farmers need long term permits so they can make capital investment decisions. we are using the water efficiently and looking after the environment then we should be given the water back with long term permits.

The success of farming is crucial to the vitality of Omakau. In my business we provide. We are able to employ 5 staff which helps support 3 families. Manuherikia River is part of our backyard. We enjoy

swimming, fishing and picnicking in and near the river. It is a very pleasant location as it is more water will in it will not enhance many of the aspects ORC claim or hope to achieve.

This delay in updating the current Water Plan to be compliant with the National Policy Statement is the fault of the ORC not us the farming community. The farmers should get their long term permits and any changes to those permits can be at the cost of the ORC at a later date once they have got their Plans updated.

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.