

Submission on Proposed Water Permits Plan Change (Plan Change 7 or PC7)
to the Regional Plan: Water for Otago

To: Otago Regional Council
policy@orc.govt.nz

From &
Prepared by: Caroline Tamblyn as an individual

Address:

[REDACTED]

Contact:

[REDACTED]

Speaking Rights: Yes

Endorsements:

I endorse two other submissions made on this Plan Change 7.
Coal Creek Water Users Group &
"Otago Water Resource Users Group" (OWRUG).

Background: I live with my family at Coal Creek, we farm and grow cherries.

The Tamblyn family have used water from Coal Creek to irrigate many horticultural crops on this property for nearly 160 years. We believe that we've taken and used water in a sustainable manner.



Caroline Tamblyn

Policy 10A.2.1

Policy 10A.2.1 Irrespective of any other policies in this Plan, avoid granting resource consents that replace deemed permits, or water permits to take and use surface water (including groundwater considered as surface water under policy 6.4.1A (a), (b) and (c) of this Plan) where those water permits expire prior to 31 December 2025, except where:

- (a) The deemed permit or water permit that is being replaced is a valid permit; and*
- (b) There is no increase in the area under irrigation, if the abstracted water is used for irrigation; and*
- (c) There is no increase in the instantaneous rate of abstraction; and*
- (d) Any existing residual flow, minimum flow or take cessation condition is applied to the new permit; and*
- (e) There is a reduction in the volume of water allocated for abstraction.*

AND

Rule 10A.3.1

Rule 10A.3.1 Despite any other rule or rules in this Plan;

- a. any activity that is currently authorised under a Deemed Permit; or*
- b. the take and use of surface water (including groundwater considered as surface water under policy 6.4.1A (a), (b) and (c) of this Plan) that is currently authorised by an existing water permit where that water permit expires prior to 31 December 2025;*

is a controlled activity provided the following conditions are met:

- (i) The consent duration sought is no more than six years; and*
- (ii) The deemed permit or water permit that is being replaced is a valid permit; and*
- (iii) The application demonstrates that the total land area under irrigation does not exceed that irrigated in the 2017-2018 irrigation season, if the abstracted water is used for irrigation; and*
- (iv) The rate of take shall be no more than the average maximum rate of take limit recorded during the period 1 July 2012 – 30 June 2017 and calculated in accordance with the method in Schedule 10A.4; and*
- (v) Any existing residual flow, minimum flow, or take cessation condition (whichever is applicable) is included in the application for resource consent; and*
- (vi) The volume of water taken shall be no more than the average maximum of the daily volume limit, or monthly volume limit, or annual volume limit (whichever one or more are applicable) recorded during the period 1 July 2012 – 30 June 2017, and calculated in accordance with the method in Schedule 10A.4.*

I oppose Policy 10A.2.1 and Rule 10A.3.1

My reasons for opposing PC7 have been explained in the Coal Creek Water Users Group submission.

This submission is about the value of honest communication between OCR and all stakeholders, especially listening to one another's views.

Lack of Co-operation between ORC and Irrigators

It is my personal view is that ORC have acted in a bad faith manner that has caused a high level of mistrust by irrigators. ORC's politicking and unexpected swerve in producing PC7 has been unnecessary and harmful. This has created a distrusting environment for stakeholders to share information and work together.

All parties recognise that there are many challenges ahead in working towards an enduring water plan under the NPS. There is a massive amount of work to do in updating the Otago Water Plan before 2025. Everyone should be concentrating on that goal and not be diverted by the disruption of PC7.

ORC Councillors should recognise that maintaining open and trusting relationships with all stakeholders is paramount. That is the only way to achieve the huge volume of work to be done over the next few years. That is the important goal. Pursuing PC7 will prevent real progress towards solutions that everyone can live with.

Solution

Abandon the entire Plan Change 7 proposal.