

# ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 57

Julie Perry, WAI Wanaka - Upper Clutha Lakes Trust (Julie Perry)



**Submitter Type:** Not specified

**Source:** Web Form

## 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 Plan Change 8 or the whole plan change.

### Position

I am submitting on the whole plan change.

### Notes

### 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?

### Position

Approve the plan change with amendments

### Notes

### 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

Please indicate your choice(s) below. If you do not indicate your intention to call experts, you can change your mind later and decide to call experts to give evidence in relation to your submission, provided you do so in time to meet any procedural direction the Environment Court might make.

### Position

If others make a similar submission I/we would consider presenting a joint case with them at a hearing

### Notes

### Clause

Authority to act:

### Position

I confirm I have the authority to sign this submission on behalf of the submitter

**Notes**



**Submission on the Otago Regional Council Proposed Plan Change 8 (Discharge Management) for the Regional Plan: Water for Otago.**

**From: WAI Wanaka - Upper Clutha Lakes Trust Board**

Regarding Proposed Plan Change 7 (Water Permits) and Proposed Plan Change 8 (Discharge Management) to the Regional Plan: Water for Otago, WAI Wanaka has not made a detailed submission given the timing of the finalising of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 and the gazetting of the National Policy Statement For Freshwater Management 2020. Our primary interest is in PPC 8. We do not comment further on PPC 7.

Some attempt has been made in ORC's Section 32 report on PPC 8 to anticipate the pending changes to water management regulations, and the points made by stakeholders during the consultation phase of the preparation of the Section 32 report on PPC 8 cover many of the concerns that we also have on the draft.

However the over-riding difficulty we experienced was how to address the changes in PPC 8, which had were prepared prior to the finalisation of the National Policy Statement for Freshwater Management and the Resource Management (National Environmental Standards for Freshwater) Regulations. All existing content for Regional Plan: Water for Otago and new changes proposed by PPC 8 should be considered and drafted in the light of these new freshwater regulations, rather than before their completion. Implementing plan changes with minimal regard to NPS-FM and NES FW renders the consultation/ submission process difficult at best and "cart-before-horse" at worst.

Addressing Otago's water quality issues with collaborative, evidence based management by Councils and communities is a matter of great importance to WAI Wanaka. We encourage ORC to move as quickly as possible to reconsider their Proposed Plan Change 8 in the context of, and conforming with the now completed Resource Management (National Environmental Standards for Freshwater) Regulations 2020 and the National Policy Statement For Freshwater Management 2020. We acknowledge that many of the aspects in these new instruments will already be covered in the Section 32 report or the PPC 8 draft, but nevertheless hope that this step will be a priority for ORC.

We would appreciate an opportunity to be involved in any stakeholder consultation that results from next steps in the process of the completion and implementation of the Otago Regional Policy Statements addressing catchment based management of water quality.