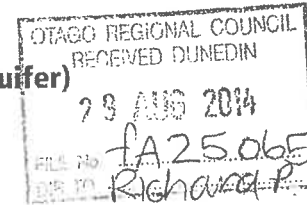




SUBMISSION FORM (Print clearly on both sides)

Proposed Plan Change 4C (Groundwater management: Cromwell Terrace Aquifer) to the Regional Plan: Water for Otago

Form 5, Clause 6 of the First Schedule, Resource Management Act 1991.



1
Office use only

Name of submitter:

James Drury

Organisation (if applicable):

Central Otago Winegrowers Assn

Postal address:

9- Grape Vision Ltd

28 Cairnmuir Rd, RD2

Cromwell

Postcode:

9384

Telephone:

027 445 0602

Fax:

—

Email:

jdruce@grapevision.com

I wish / do not wish (circle preference) to be heard in support of my submission.

If others make a similar submission, I will / will not consider presenting jointly with them at a hearing (circle preference).

Signature:

James Drury

Date: _____

(of submitter, or person authorised to sign on behalf of person making submission).

Trade competitor's declaration (if applicable)

I could gain through trade competition from a submission, but my submission is limited to addressing environmental effects directly impacting my business

Signature: _____

Note that all submissions are made available for public inspection.

SUBMISSIONS MUST BE RECEIVED BY 5.00 PM, FRIDAY 12 SEPTEMBER 2014.



Send to:
Freeport ORC 497
Otago Regional Council
Private Bag 1954
Dunedin 9054

Please turn over

1 State what your submission relates to and if you support, oppose or want it amended	2 State what decision you want the Otago Regional Council to make	3 Give reasons for the decision you want made
<p>E.g. amend rule 'y' Schedule 4 4A</p>	<p>E.g. rule 'y' should say... I support the change to a Schedule 4A with the adoption of a tailored groundwater management guide to $4 \text{ m}^3/\text{yr}$ but believe that surface takes should also be allowed. (option 3)</p>	<p>E.g. I want rule 'y' changed because... Groundwater takes are expensive and there is a degree of uncertainty regarding whether water can be extracted in this manner. Surface takes should be allowed as well as groundwater (should not be either/or) and the reason for not doing so (hard to calculate effect) should not preclude this manner of take.</p>



OTAGO REGIONAL COUNCIL
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Federated Farmers of New Zealand

Submission to Otago Regional Council on Plan Change 4C (Groundwater Management: Cromwell Terrace Aquifer) to the Regional Plan: Water for Otago

2 September 2014



0800 327 646 | **FED FARM** .ORG.NZ

8

SUBMISSION TO OTAGO REGIONAL COUNCIL ON PLAN CHANGE 4C

Form 5

Submission on publicly notified proposal for policy statement or plan
Clause 6 of First Schedule, Resource Management Act 1991

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

Name of submitter: Federated Farmers of New Zealand

Contact person: Kim Reilly
Regional Policy Manager, South Island.

Address for service: PO Box 5242, Dunedin 9054

This is a submission on the following proposed plan change – Plan Change 4C (Groundwater Management: Cromwell Terrace Aquifer) to the Regional Plan: Water for Otago

I could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that my submission relates to and the decisions we seek from Council are as detailed on the following pages.

I wish to be heard in support of my submission.

1. INTRODUCTION

- 1.1 Federated Farmers of New Zealand (Inc) is a voluntary, primary sector organisation representing farming members and their families. Federated Farmers has a long history of representing the needs and interests of New Zealand's farming communities, primary producers and agricultural exporters.
- 1.2 The Federation aims to add value to its members' farming business by ensuring that New Zealand provides an economic and social environment within which our members may operate their business in a fair and flexible manner.
- 1.3 Our members strongly support a regional planning approach that recognises landowners play a principle role as managers (and financiers) of the regions natural and physical resources. They also support regional plans that are truly effects based and do not unnecessarily inhibit or pose constraints on farming activities, while ensuring that any risks to the environment associated with farming are appropriately avoided or managed by landowners.
- 1.4 Landowners are in the whole, proactive resource managers who rely heavily on their properties natural and physical resources for their farming business. It is entirely in their best interest and subsequently that of the region, to manage their land and water resources sustainably.
- 1.5 We note that the intent of Proposed Plan Change 4C is to establish a maximum allocation volume for the Cromwell Terrace Aquifer in Schedule 4C of the Water Plan and that Council held a public workshop in Cromwell in March in this regard. We understand that recent aquifer study results were discussed and that the option of setting a tailored maximum allocation limit of 4Mm³/yr was widely endorsed by those attending the workshop.
- 1.6 We support Council ensuring that the groundwater resources of the Cromwell Terrace are better managed, now and into the future. Our members seek a surety of supply for existing takes and a limit that reflects that there are currently no known issues with water table decline.

2 GENERAL COMMENTS

- 2.1 Council has noted that it has been involved in extensive rounds of community consultation throughout this plan change process. We understand that the local and wider communities and other affected stakeholders identified a number of values and uses to be considered important.
- 2.2 Values and uses identified included the need for availability of water takes for irrigation, domestic and stock water supply, natural and cultural values, bottled water supply and frost fighting and hydro-electricity generation.
- 2.3 We understand that local community feedback indicated that there is still scope for further expansion of the land under irrigation, with changing market conditions also driving the conversion of land into productive uses that require higher irrigation inputs.
- 2.4 In summary, stakeholder consultation indicated a general support for increasing the availability of more groundwater for a variety of uses on the Terrace, as long as there would be no adverse impact on existing uses of known values.
- 2.5 In complying with the National Policy Statement for Freshwater management and the objectives of the Regional Water Plan, Council must provide for a fair, reasonable management regime for plan users. As part of this process, the values and uses the

community has identified as important should be provided for in a fair and reasonable manner.

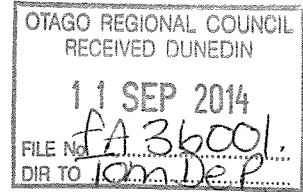
- 2.6 Federated Farmers support for Plan Change 4C is dependant on the workability and reasonableness of the resulting transition and implementation timelines.
- 2.7 We note that currently, as no maximum allocation volume has been set for the Cromwell Terrace Aquifer in Schedule 4A, that a default volume exists at 1.2Mm³/yr. We agree with Council's comments within the section 32 Report analysis that this comes at a social and economic cost, in that it doesn't adequately enable the local community to fully capitalise on future economic opportunities or to improve their wellbeing. There is also no benefit for natural, cultural or recreational values and as the volume is only 'default' there is a lack of clarity and certainty for plan users.
- 2.8 We note that Council's preferred option is to adopt a tailored groundwater management regime that allows for further groundwater to be allocated from the aquifer. Federated Farmers agrees that option 2 provides for a number of additional benefits. In addition to the social and economic benefits, there is greater certainty and clarity for plan users. We agree that this option promotes a more efficient resource use as it allows for various types of irrigation-dependent land-uses to take place on the terrace, provided the irrigation water is efficiently applied.
- 2.9 Council has noted that during public workshops on this plan change, the option of setting a tailored maximum allocation volume of 4Mm³/yr in Schedule 4A was widely endorsed by the local community.
- 2.10 We note that the aquifer is currently receiving a modest volume of infiltration from irrigation, rainfall and inflow from the Kawarau arm of Lake Dunstan, and that the majority of any excess is discharge back into the lake as groundwater seepage. As there is dynamic equilibrium between the lake and the aquifer, Council's conclusion is that the maximum allocation limit of 4Mm³/yr is appropriate.
- 2.11 We support Council's conclusion within the Section 32 Report that the setting of aquifer restriction levels is not necessary due to the only negligible risk of water table decline and aquifer compaction.
- 2.12 Federated Farmers supports an approach that allows the local community to adequately provide for their wellbeing, specifically where it provides scope for further growth in economic sectors and activities reliant on the availability of groundwater on the Terrace.
- 2.13 Federated Farmers support to the maximum allocation volume being set at 4 million cubic metres per year is provisional on this adequately reflecting the needs of the local landholders and feedback from the consultation to the plan change.

Recommendations

- **That the proposed 4Mm³/yr maximum allocation volume for the Cromwell Aquifer Terrace is adopted but only if this does adequately reflect the needs of the local landholders and feedback from the consultation workshops preceding this proposal;**
- **That this maximum allocation volume enables socio-economic and cultural wellbeing of those within the catchment and the wider region, while ensuring reliable access to the resource;**
- **that the setting of aquifer restriction levels is not necessary due to the only negligible risk of water table decline and aquifer compaction.**

Sarah Valk

From: watson family <juliewatson@clear.net.nz>
Sent: Thursday, 11 September 2014 6:49 p.m.
To: Policy Reply
Subject: Submission to ORC on Cromwell Aquifer



Submission on Proposed Plan Change 4C – Cromwell Terrace Aquifer

Name of Submitter Julie Watson – Friberg Horticulture
Address 80 Queen Street, Dunedin North, Dunedin 9016
Phone 03 4779089
Email juliewatson@clear.net.nz

I support the proposed plan changes 4C setting the Maximum Allocation Limit at 4 million cubic metres per year

I want the Otago Regional Council to approve the plan change as notified

The reasons for the decision I want are:

I own land above the Cromwell Terrace aquifer, note the aquifer level is not reacting to the current level of take and have an interest in gaining access to water for irrigation

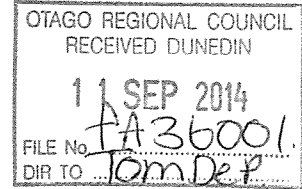
I do not wish to be heard in support of this submission

Yours sincerely

Julie Watson

Sarah Valk

From: Kerry Hand <kerry.hand@miramare.co.nz>
Sent: Thursday, 11 September 2014 8:42 p.m.
To: Policy Reply
Subject: Submission to ORC on Cromwell Aquifer



Submission on Proposed Plan Change 4C – Cromwell Terrace Aquifer

Name of Submitter Kerry Hand - KJ Hand Family Trust
Address Box 989 Dunedin 9054
Phone 021 655 907
Email kerry.hand@miramare.co.nz

I support the proposed plan changes 4C setting the Maximum Allocation Limit at 4 million cubic metres per year

I want the Otago Regional Council to approve the plan change as notified

The reasons for the decision I want are:

I have an interest in gaining access for water for irrigation.
I have a property above the aquifer.
My understanding is that recent investigations show the aquifer is well connected to Lake Dunstan, the Clutha and Kawarau.
Meaning the aquifer is well capable of successful response to extraction

I do not wish to be heard in support of this submission

Yours sincerely

Kerry Hand

Submission form - Proposed Plan Change 4C (Groundwater management: Cromwell Terrace Aquifer)

Submission Date 2014-09-11 17:32:37

Full name of submitter: Janeen Wood

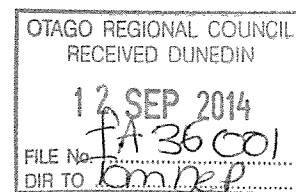
Name of organisation: Cromwell & District Community Trust

Postal address: Street Address: c/o 271 Bannockburn Rd
Suburb: RD2
City: Cromwell
Postcode: 9384

Telephone: 03 445 4487

E-mail: janeenmwood@xtra.co.nz

I wish / do not wish to be heard in support of my submission I do not wish to be heard



Signature

JM Wood

Signature - Trade competitor's declaration (if applicable)

1. State what your submission relates to and if you support, oppose or want it amended

Support on allocation limits on Cromwell Terrace Aquifer extraction

2. State what decision you want the Otago Regional Council to make

Restrict the annual amount of extraction from the aquifer to 4 million cubic metres.

Give reasons for your decision you want made

Our first focus point in our Cromwell Community Plan is on Lake Dunstan -

1st objective, pg 15, is "For the lake to maintain aesthetic values through appropriate care, development and access provisions" We don't want our lake to be compromised in anyway. Excessive uptake could change the nature of the lake.

We are also mindful of another plan objective ,pg18, "Cromwell's anticipated growth is appropriately and carefully

planned for with priority for maintaining its landscape and environmental values" - the action point "Maintain the momentum and raise the awareness for ensuring there is a long term plan for the water supply and wastewater which will meet the growth expectations". We know this ruling on water is needed to cover growth in our community - but not to the extent that it alters our environment - we do not want to allow too much water onto what is traditionally arid land. We therefore do not think dairying is an appropriate activity for this basin.

In Summary : we want to preserve the environment and landscape values of our area. We want to ensure that the water uptake is limited and not excessive to affect the lake when drawing water and the land this water will be applied to.

Thankyou

OTAGO REGIONAL COUNCIL
RECEIVED DUNEDIN
12 SEP 2014
FILE No. FA36001
DIR TO Tom Del



**Submission to Otago Regional Council on Proposed
Plan Change 4C to the Regional Plan: Water
(Groundwater Management: Cromwell Terrace
Aquifer)**

From

Contact Energy Limited

12 September 2014

**Submission by Contact Energy Limited On Proposed Plan Change 4c to the Regional Plan:
Water (Groundwater Management: Cromwell Terrace Aquifer)**

To: Chief Executive
Otago Regional Council
Private Bag 1954
70 Stafford Street
DUNEDIN 9054

policy@orc.govt.nz

Name of Submitter: Contact Energy Limited

Contact Person: Daniel Druce

Address for Service: Contact Energy Limited
PO Box 25
CLYDE

Telephone: 03 440 0319

Cell: 021 711 311

Email: daniel.druce@contactenergy.co.nz

Contact Energy Limited ("Contact") wishes to be heard in support of this submission.

If others make a similar submission, Contact would not be prepared to consider preparing a joint case with them at any hearing.

Introduction

Contact Energy Limited (**Contact**) is pleased to be able to submit on proposed Plan Change 4C: Groundwater Management: Cromwell Terrace Aquifer.

About Contact

Contact is one of New Zealand's leading energy generators and retailers, providing electricity, natural gas and LPG to around 570,000 customers nationwide and generating around 23 per cent of New Zealand's electricity.

Contact is one of the country's most widely held stocks with around 75,000 shareholders. Contact employs approximately 1,100 people throughout New Zealand so Contact is an integral part of the national economy, our diverse society and local communities.

In the Otago Region, Contact owns and operates two hydro-electric power stations at Clyde and Roxburgh as well as the Hawea Dam and Control Gates structure at Lake Hawea. Contact also operates a call-centre from central Dunedin and distributes Rockgas (LPG) throughout the region.

Summary of Submission

Contact generally **supports**:

- simplifying the existing Regional Plan: Water;
- reducing complexity in existing provisions; and
- managing and protecting water bodies, including aquifers, from over allocation; and
- efficient use of water resources.

That said, Contact has concerns about the allocation of water contemplated by Plan Change 4C. Contact's seeks changes as outlined below.

Submission

Aquifer Characteristics

The Cromwell Terrace Aquifer currently has an allocation volume of 1.7 million cubic metres per annum.

Proposed Plan Change 4C will set a new allocation volume in Schedule 4A of the Regional Plan: Water. The maximum allocation volume is proposed to increase to 4.0 million cubic metres per annum.

This is a 235% increase from the existing allocation volume to the new proposed allocation volume. Relatively this is the equivalent of an additional year round water take at 72 litres per second (T. dePelsemaker, ORC, July 2014).

The groundwater that is already allocated by existing resource consents is just over 1.7 million cubic metres per year.

As set out in the Section 32 report and the Cromwell Terrace Aquifer Study,¹ the Cromwell Terrace Aquifer:

- has high permeability and a high degree of hydraulic communication with Lake Dunstan;
- The filling of Lake Dunstan in 1993 due to the Clyde Dam demonstrated a degree of hydraulic connection and added substantially to the available water resource of the Cromwell Terrace Aquifer; and
- is in dynamic equilibrium with Lake Dunstan. This being the case, the aquifer will, due to its high transmissivity, *'respond rapidly to balance any over-draught of groundwater extraction by bores with corresponding volumes of infiltration from the lake. This has been conclusively demonstrated...'*¹

Effects on Contact

Recent resource consent hearings for resource consent applications upstream of the Clyde Dam have considered the effect of new groundwater takes with high degrees of hydraulic connection to the Clutha River on the resource consents of Contact.

In all cases ORC decision makers or Hearing Commissioners have considered that it is appropriate to place restrictions on new applications for consumptive takes of water (such as irrigation) to provide a degree of protection to the resource consents and to provide for the operation of Lake Dunstan and Contact's hydroelectric operations.

The conditions appended have all required the cessation of take i) during winter months (May through August inc); and ii) when the level of Lake Hawea and catchment's rivers fall to low levels.²

These conditions provide for maximum efficiency in the use of water: for irrigation during spring and summer when it is in demand; for electricity generation during autumn and winter when demand is highest. These conditions also recognise the importance of hydro

¹ Cromwell Terrace Aquifer Study, Resource Science Unit, Otago Regional Council, 2012.

² As defined in resource consent ORC2001.394_v1 8a).

electric generation when the availability of water within the catchment is severely restricted. Electricity generation from the Clutha meets approximately 10 per cent of New Zealand demand.

Such conditions also recognise the cumulative effect on downstream hydroelectric generation. While the additional water to be allocated to the Cromwell Terrace aquifer is small, and while Contact recognises the social, cultural and economic importance of takes from this aquifer it is important to recognise that Lake Dunstan was formed and managed within a small operating range for the sole purpose of supporting hydro electric generation while maintaining landscape and amenity.

Contact records indicate that about three cumecs / 30 million cubic metres of water have been allocated for the purposes of irrigation since 2009. Note that this excludes the water allocated for the operation of Tarras Water Limited.

Correspondence with the ORC has suggested that these standard Clutha conditions are unlikely to be given recognition to the potential effects of allocating further groundwater from the Cromwell Terrace Aquifer on Contact Energy's hydro-electric operations. That being the case Contact is likely to continue to submit on applications for groundwater that are hydraulically connected to surface water bodies, in particular the Clutha River, and on all applications within 100m from a surface water body or that are beyond 100m but deplete surface water by at least 5l/s (Regional Plan: Water, Policy 6.4.1A).

Other Issues

Other issues raised in Contact's recent submission on Plan Change 4B: Groundwater Allocation have not been restated in this submission.

Relief Sought

Amend Plan Change 4C to detail aquifer restrictions for new consumptive groundwater takes and replacement consumptive groundwater takes for from the Cromwell Terrace Aquifer as set out in recent resource consent decisions in the upper Clutha i.e. restrictions that provide a degree of protection to the resource consents providing for the operation of Lake Dunstan and Contact's hydroelectric operations.

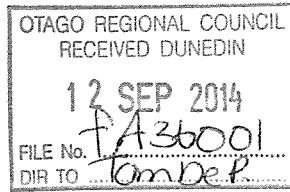
The standard conditions as set out in recent resource consent decisions in the upper Clutha are as follows:

- 1. During the period 1 May to 31 August in any calendar year the taking of water for the purposes of irrigation authorised by this consent shall cease.*

2. At all other times the taking of water for the purposes of irrigation authorised by this consent shall cease when:
- i) the combined flow levels in the following rivers are below 250 cubic metres per second:
- Clutha River at Cardrona (NIWA Hydrological Recording Site No. 75282) plus ten cubic metres per second, less the mean Hawea River flow as measured at the Camp Hill site (NIWA Hydrological Recording Site No.75287); and
 - Kawarau River at Chards Road (NIWA Hydrological Recording Site No. 75262);
 - Nevis River at Wentworth (Site No. 75265);
 - Manuherikia River at Ophir (NIWA Hydrological Recording Site No. 75253);
- and
- ii) the level of Lake Hawea is at or below 338.2 metres above datum (based on a 3 hour rolling average) as measured at Hawea Dam site (NIWA Hydrological Recording Site no. 75288).
3. ORC may serve notice pursuant to section 128 of the RMA 1991 of its intention to review the conditions of this consent to require greater efficiency of water use and/or further steps that may be required to ensure consistency with Contact's "Minimum Discharge from Lake Roxburgh to the Clutha River (ORC 2001:394 condition 8)".



Daniel Druce
Environmental Advisor
Contact Energy



7

SUBMISSION	
<i>Form 5, Clause 6 of the First Schedule, Resource Management Act 1991.</i>	
TO:	Otago Regional Council
DATE:	12 September 2014
PLAN CHANGE:	Proposed Plan Change 4C (Groundwater management: Cromwell Terrace Aquifer) to the Regional Plan: Water for Otago. The plan change sets a maximum allocation limit for the Cromwell Terrace Aquifer in Schedule 4A of the Water Plan.
KĀI TAHU KI OTAGO PAPATIPU RŪNAKA	Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga (Kāi Tahu)
Kāi Tahu supports the underlying principles of this plan change.	
Kāi Tahu does not wish to be heard in support of this submission at a hearing.	

1. Introduction

- 1.1 Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga (collectively Kāi Tahu) are Manawhenua in Central Otago.
- 1.2 Kāi Tahu has assessed Proposed Plan Change 4C (Groundwater Management: Cromwell Terrace Aquifer) to the Regional Plan: Water that increases the maximum allocation limit for the groundwater resources of the Cromwell Terrace Aquifer
- 1.3 Kāi Tahu appreciates the precautionary approach taken by the Otago Regional Council to the management of groundwater resources in this catchment.

2. Te Rūnanga o Ngāi Tahu Freshwater Policy (NTFP)

- 2.1 The focus of the NTFP is the management of freshwater resources within the Kāi Tahu rohe. The NTFP outlines the environmental outcomes sought by Kāi Tahu and the guiding freshwater management principles, respectively:

- Water is central to all life. It is a taonga left by the ancestors to provide and sustain life. It is for the present generation as tangata tiaki to ensure that the taonga is available for future generations.
- Water plays a unique role in the traditional economy and culture of Kāi Tahu.

- Water has an inherent value that should be recognised in the event of potentially competing uses.
 - Water is a holistic resource. The complexity and interdependency of different parts of the hydrological system should be considered when developing policy and managing the water resource.
- 2.2 The relationship between groundwater and surface water is a key concern for Kāi Tahu. Robust information is necessary on the interaction between groundwater and surface water in setting the maximum allocation limit for the Cromwell Terrace Aquifer.

3. Kāi Tahu ki Otago Natural Resource Management Plan 2005 (the Plan)

- 3.1 The Kāi Tahu ki Otago Natural Resource Management Plan 2005 is the principal resource management planning document for Kāi Tahu ki Otago. The kaupapa of the plan is Ki Uta ki Tai (Mountains to the Sea), which reflects the holistic Kāi Tahu ki Otago philosophy of resource management.
- 3.2 The Plan expresses Kāi Tahu ki Otago values, knowledge and perspectives on natural resource and environmental management issues. The Plan is an expression of kaitiakitanga. While the Plan is first and foremost a planning document to assist Kāi Tahu ki Otago in carrying out their kaitiaki roles and responsibilities, it is also intended to assist others in understanding tangata whenua values and policy.
- 3.3 The Plan is divided into catchments, with specific provisions for the whole Otago area and each catchment. This plan contains objectives and policies that are relevant to the proposed plan change, respectively:

Objectives

- The spiritual and cultural significance of water to Kāi Tahu ki Otago is recognised in all water management.
- The waters of the Otago Catchment are healthy and support Kāi Tahu ki Otago customs.
- Habitats and the wider needs of mahika kai, taoka species and other species of importance to Kāi Tahu ki Otago are protected.

Policies

- To promote the cultural importance of water to Kāi Tahu ki Otago in all water management within the Otago Region.

- To promote catchment-based management programmes and models, such as Ki Uta Ki Tai.
- To require information on the interaction between groundwater and surface water as part of an application for consent to take water.

3.4 The objectives and policies of the Kāi Tahu ki Otago Natural Resource Management Plan 2005 align with those of the Te Rūnanga o Ngāi Tahu Freshwater Policy. The connectivity between groundwater and surface water must be taken into account in determining maximum allocation limits for Otago's aquifers.

4. Specific Submissions

4.1 Kāi Tahu has assessed Proposed Plan Change 4C and identified the relief sought. Council is requested to implement the relief sought below, make any similar amendments with like effect to the relief sought, and make any consequential amendments necessary to give effect to the relief sought.

4.2 Kāi Tahu supports in principle the setting of a tailored maximum allocation limit of 4 Mm³/yr for the Cromwell Terrace Aquifer in Schedule 4A.

4.3 Kāi Tahu submits that an increase in the allocation of groundwater should in principle be coupled with the setting of aquifer restriction levels. However, it is understood that the risk of water table decline and aquifer compaction from an increase in the maximum allocation limit for the Cromwell Terrace Aquifer is low.

Decision Sought

4.4 That the Otago Regional Council monitors the effects on the Cromwell Terrace Aquifer of an increase in the maximum allocation limit to 4 Mm³/yr.

Nahaku noa, Na



Chris Rosenbrock
Manager

Address for Service:

Tim Vial

Senior Planner

KTKO Ltd,

PO Box 446

Dunedin 9054

Phone Number: (DD) (03) 471 5480

E-mail: tim@ktkold.co.nz

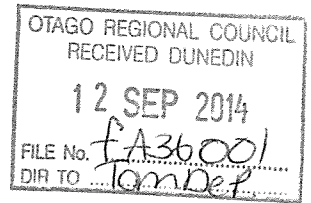
SUBMISSION ON PROPOSED PLAN CHANGE 4C – Groundwater Management – Cromwell Terrace Aquifer TO THE REGIONAL PLAN – Water for Otago

TO: Otago Regional Council

SUBMISSION ON: Proposed Plan Change 4C to the Regional Plan – Water for Otago

NAME: Horticulture New Zealand

ADDRESS: PO Box 10 232
WELLINGTON



1. Horticulture New Zealand’s submission, and the decisions sought, are detailed in the attached schedules:

Schedule 1 Submission

2. Horticulture New Zealand wishes to be heard in support of this submission.

3. Background to Horticulture New Zealand and its RMA involvement:

3.1 Horticulture New Zealand was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers’, New Zealand Fruitgrowers’ and New Zealand Berryfruit Growers Federations.

3.3 On behalf of its 6,000 active grower members Horticulture New Zealand takes a detailed involvement in resource management planning processes as part of its National Environmental Policies. Horticulture New Zealand works to raise growers’ awareness of the RMA to ensure effective grower involvement under the Act, whether in the planning process or through resource consent applications. The principles that Horticulture New Zealand considers in assessing the implementation of the Resource Management Act 1991 (RMA) include:

- The effects based purpose of the Resource Management Act,
- Non-regulatory methods should be employed by councils;
- Regulation should impact fairly on the whole community, make sense in practice, and be developed in full consultation with those affected by it;
- Early consultation of land users in plan preparation;
- Ensuring that RMA plans work in the growers interests both in an environmental and “right to farm” sense.

Thank you for the opportunity to comment on the Proposed Plan Change 4C.

Chris Keenan
Manager, Natural Resources and Environment

Date: 12 September 2014

Address for Service:

Chris Keenan
Manager – Resource Management and Environment
Horticulture New Zealand
P O Box 10-232
WELLINGTON
Phone: DDI (04)470 5669
(04) 472 3795
Facsimile: (04) 471 2861
Mobile 027 668 0142
Email: chris.keenan@hortnz.co.nz

SCHEDULE ONE: Submission on PC 4C

- 1.1 Horticulture NZ supports the approach that Council has proposed to set a limit of 4 Mm³ /yr for the Cromwell terrace Aquifer.

The technical report identifies that the default allocation of 1.2 Mm³ /yr significantly underestimates the maximum allocation limit, thereby making the aquifer technically over-allocated.

Amending the Plan to provide for a maximum allocation limit of 4 Mm³ /yr ensures that users will not be unjustifiably asked to reduce takes. The approach enables users to have surety of supply and this is supported.

Horticulture NZ supports the approach in the s32 Report that there is no need to manage all groundwater takes as surface water takes and that there is no justification for setting aquifer restrictions levels in Schedule 4B.

Decision sought:

Adopt Plan Change 4C as notified.