



OTAGO REGIONAL COUNCIL
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Federated Farmers of New Zealand

Further Submission on Otago Regional Council Plan Change 4C (Groundwater Management: Cromwell Terrace Aquifer)

7 October 2014

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**FURTHER SUBMISSION TO OTAGO REGIONAL COUNCIL ON PLAN
CHANGE 4C (GROUNDWATER MANAGEMENT: CROMWELL TERRACE
AQUIFER)**

Form 6

Further submission in support of, or in opposition to, submission on publicly notified
proposed policy statement or plan
Clause 8 of First Schedule, Resource Management Act 1991

To: *Otago Regional Council*
Private Bag 1954
Dunedin 9054

Name of further submitter: Federated Farmers of New Zealand

Contact person: Kim Reilly
Regional Policy Manager, South Island

Address for service: PO Box 5242, Dunedin 9058 or kreilly@fedfarm.org.nz

This is a further submission in response to submission/s made on the following proposed plan change 4C (Groundwater Management: Cromwell Terrace Aquifer).

The following pages detail the specifics in relation to our support or opposition to various submissions lodged. Our further submissions include the particular parts of each submission supported or opposed alongside our reasons for that position and what decision we seek from the local authority.

I wish to be heard in support of my further submission.

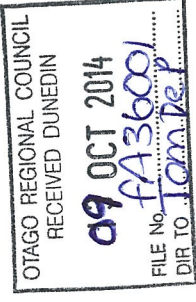
Note to person making further submission

A copy of your further submission must be served on the original submitter within 5 working days after making the further submission to the local authority.

Where Federated Farmers submitted on the same variation point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers views on points raised by other submitters.

Submitter Name	Sub No.	Section of Plan	Summary of relevant part of Submission	Support/ Oppose	Reason for submission
Contact Energy Limited	#6	Whole Plan Change	<p>Amend Plan Change 4C to detail aquifer restrictions for new consumptive groundwater takes and replacement consumptive groundwater takes 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.</p> <p>The submitter advised that they are 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 100 m from a surface water body or that are beyond 100 m but deplete surface water by at least 5 l/s. This is because Council has suggested in correspondence that that these Clutha standard conditions are unlikely to be given recognition to the potential effects of allocating groundwater from the Cromwell Terrace Aquifer on the submitter's operations.</p>	Oppose	This request is not consistent with approaches elsewhere in the Plan. It is not appropriate to address resource consent level matters through this plan change process. Such concerns should be raised as appropriate, along with all other information through resource consenting processes.



**FURTHER SUBMISSION BY CONTACT ENERGY LIMITED IN SUPPORT OR OPPOSITION TO SUBMISSIONS
ON PROPOSED PLAN CHANGE 4C (GROUNDWATER MANAGEMENT: CROMWELL TERRACE AQUIFER)
UNDER CLAUSE 8 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991**

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

Telephone: 0-3-440 0319
Facsimile: 0-3-440 0302
Email: daniel.druce@contactenergy.co.nz

Contact submitted on Proposed Plan Change 4C (Groundwater Management: Cromwell Terrace Aquifer).

Contact wishes to make further submissions in support or opposition to submissions on Proposed Plan Change 4C (Groundwater Management: Cromwell Terrace Aquifer).

Contact's further submissions are as set out in the table attached.

Contact wishes to be heard in support of its submissions and further submissions.

Yours faithfully

CONTACT ENERGY LIMITED



Daniel Druce
Environmental Advisor

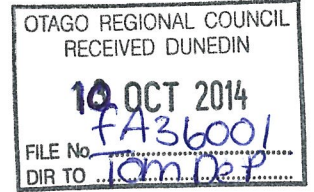
DDI: 03 440 0319
Fax: 03 440 0302
Email: daniel.druce@contactenergy.co.nz

**PROPOSED PLAN CHANGE 4C – CHANGE 4C (GROUNDWATER MANAGEMENT: CROMWELL TERRACE AQUIFER)
 FURTHER SUBMISSION BY CONTACT ENERGY LIMITED**

Submitter	Sub #	Number	Provision	Page #	Support or Oppose	Reason
Central Otago Winegrowers Association	1		Schedule 4A		Support in part.	Support change to Schedule 4A to limit groundwater allocation to 4 Mm ³ /yr.
Federated Farmers	2		Schedule 4A		Oppose in part	The annual groundwater allocation should be assessed and adopted on a scientific basis rather than reflecting the needs of local landholders and feedback from the consultation workshops.
Cromwell and District Community Trust	5		Schedule 2A		Support in part.	Support change to Schedule 4A to limit groundwater allocation to 4 Mm ³ /yr.
Kai Tahu ki Otago	7		Schedule 4A		Support in part.	Support change to Schedule 4A to limit groundwater allocation to 4 Mm ³ /yr.
Horticulture NZ	8		Schedule 4A		Support in part.	Support groundwater allocation limit of 4 Mm ³ /yr.

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

(Closing date: 10 October 2014 5pm)



To: Otago Regional Council
Private Bag
Dunedin

Fax: 03 479 0015
Email: policy@orc.govt.nz

Full Name of Further Submitter:
Horticulture NZ

Full Postal Address:
P O Box 10 232
Wellington, 6143

Attn: Chris Keenan

Telephone Number: 04 494 9973
Email: chris.keenan@hortnz.co.nz

Fax Number: 04 471 2861

I do wish to be heard in support of my submission

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

.....
Signature of person making submission or person authorised to sign on behalf of person making submission.

Date:
10 October 2014

Submitter	Sub No.	Plan Provision	Support/ Oppose	Reason
Federated Farmers of NZ	2/6	Sec 32 Report	Oppose	Horticulture NZ considers that it is necessary to set an aquifer level, otherwise the default calculations would apply and this would reduce the amount of water available for allocation.
Contact Energy Ltd	6/1	Whole plan change	Oppose	Horticulture NZ does not support the stipulation of resource consent conditions through a plan change. Each consent application needs to be assessed for potential adverse effects and appropriate conditions applied.