



**SUBMISSION FORM**  
**Proposed Plan Change 1B ~~Minimum Flows~~**  
**to the Regional Plan: Water for Otago**

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

11

Office use only

Full name of submitter: Prof P.D.R. LINDSAY-SALMON

Name of organisation (if applicable): \_\_\_\_\_

Postal address: 30, Waiakeke Valley Rd, RD17  
Canara

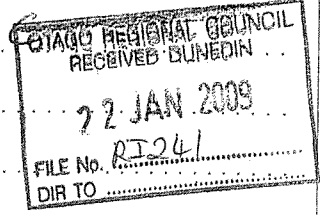
Postcode: 9491

Telephone: 03-434-8677

Fax: \_\_\_\_\_

Email: p.dr.lindsay.salmon@clear.net.nz

Contact Person: \_\_\_\_\_



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

If others made a similar submission, I will consider presenting a joint case with them at a hearing.  
 (Cross out if you would not consider presenting a joint case).

Signature of submitter: [Signature] Date: Jan 24 2009  
 (or person authorised to sign on behalf of person making submission).

Please note that all submissions are made available for public inspection.

**The parts of the proposed plan change that my submission relates to are:**

(Give clear references if possible e.g. reference number, policy x, rule y)

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**My submission is:**

(Include whether you support, oppose, or wish to have amended the parts identified above, and give reasons)

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**I seek the following decision from the local authority:**

(Give precise details e.g. changes you would like made)

What I would simply like to do is ask if the changes are necessary. Bearing in mind what irrigating land has done for California + the poor Murray River system in Australia I would like to see far more caution exercised, more testing and computer simulations done.

We already have a salt lake in the region, does anyone know why + what is the likelihood of irrigation doing the same thing at sea level?

The visiting Australian Professor who spoke about making changes how to prevent future damage made sense. Can we ask that the ARC does exercise commonsense and say no to further irrigation?

**SUBMISSIONS MUST BE RECEIVED BY 5.00 PM, MONDAY 9 MARCH 2009.**

Please fold and secure with a small piece of tape.

FreePost Authority ORC 1722



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

Attention Policy Team

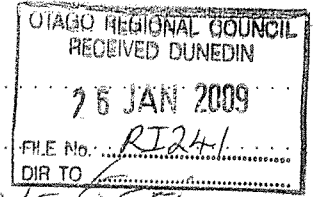


**SUBMISSION FORM**  
**Proposed Plan Change 1C Water Allocation and Use**  
**to the Regional Plan: Water for Otago**

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

12

Office use only



Full name of submitter: L.H. Evans, Richards

Name of organisation (if applicable): nil

Postal address: 99 Craighall Crescent, Dunedin

Postcode: 9010

Telephone: \_\_\_\_\_ Fax: \_\_\_\_\_

Email: \_\_\_\_\_ Contact Person: \_\_\_\_\_

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

If others made a similar submission, I will consider presenting a joint case with them at a hearing.  
(Cross out if you would not consider presenting a joint case). No appearance by me

Signature of submitter: L.E. Richards Date: 25/1/2009  
(or person authorised to sign on behalf of person making submission).

Please note that all submissions are made available for public inspection.

**The parts of the proposed plan change that my submission relates to are:**

(Give clear references if possible e.g. reference number, policy x, rule y)

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**My submission is:**

(Include whether you support, oppose, or wish to have amended the parts identified above, and give reasons)

I support careful use of water for irrigation.  
More catchment areas needed.





**SUBMISSION FORM**  
**Proposed Plan Change 1B<sup>c</sup> Minimum Flows**  
**to the Regional Plan: Water for Otago**

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

13

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Full name of submitter: Noel George Trevathan

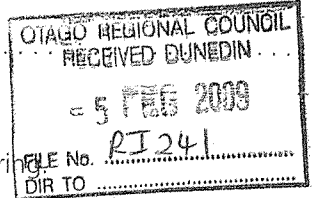
Name of organisation (if applicable): .....

Postal address: Lindisvale No 3RD Cromwell

Postcode: .....

Telephone: 03 445 2864 Fax: 03 445 2865

Email: Trevathan@xtra.co.nz Contact Person: .....



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

If others made a similar submission, I will consider presenting a joint case with them at a hearing  
 (Cross out if you would not consider presenting a joint case).

Signature of submitter: [Signature] Date: 24 Jan 09  
 (or person authorised to sign on behalf of person making submission).

**Please note that all submissions are made available for public inspection.**

**The parts of the proposed plan change that my submission relates to are:**

(Give clear references if possible e.g. reference number, policy x, rule y)

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**My submission is:**

(Include whether you support, oppose, or wish to have amended the parts identified above, and give reasons)

That the minimum flow can be set as low as zero where streams have been dry on occasions over the past 50 yrs plus, as aquatic ecosystems and natural character have adapted.  
That the priority system is managed by local communities.





**SUBMISSION FORM**  
**Proposed Plan Change 1C Water Allocation and Use**  
**to the Regional Plan: Water for Otago**

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

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Full name of submitter: *Alastair A Rutherford*

Name of organisation (if applicable):

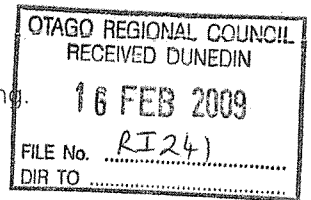
Postal address: *The Point*  
*RD3 Cromwell* Postcode: *9383*

Telephone: *034452846* Fax:

Email: *thepoint@xtra.co.nz* Contact Person:

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

If others made a similar submission, I will consider presenting a joint case with them at a hearing.  
 (Cross out if you would not consider presenting a joint case).



Signature of submitter: *A. A. Rutherford* Date: *12/02/09*  
 (or person authorised to sign on behalf of person making submission).

Please note that all submissions are made available for public inspection.

**The parts of the proposed plan change that my submission relates to are:**

(Give clear references if possible e.g. reference number, policy x, rule y)

*Part 6.4.D. To give priority to local use of local water sources, while requiring consideration of possible sources of water*

**My submission is:**

(Include whether you support, oppose, or wish to have amended the parts identified above, and give reasons)

*I require the council to ~~be~~ amend the statement so an existing local user ~~is~~ is compensated if forced to move to another water source by a new consent holder who has no alternative source.*

I seek the following decision from the local authority:

(Give precise details e.g. changes you would like made)

I would like the paragraph starting:

Sections 124A, 124B and 124C of the Resource Management Act recognise the priority for processing that replacement consents have over every new application.

To include:

if an existing user is forced to an alternative source of water by a new or existing user with no alternative then all the additional costs of the displaced user should be met by the new applicant.

**SUBMISSIONS MUST BE RECEIVED BY 5.00 PM, MONDAY 9 MARCH 2009.**

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

Attention Policy Team





**SUBMISSION FORM**  
**Proposed Plan Change 1C Water Allocation and Use**  
**to the Regional Plan: Water for Otago**  
*Form 5, Clause 6 of the First Schedule, Resource Management Act 1991.*

15

Office use only

Full name of submitter: WILLIAM JOSEPH ARTHUR

Name of organisation (if applicable): .....

Postal address: CAIRNMUIR ROAD RD2

CROMWELL Postcode: .....

Telephone: 03 445 0328 Fax: 03 445 0368

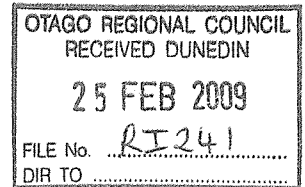
Email: ..... Contact Person: .....

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

If others made a similar submission, I will consider presenting a joint case with them at a hearing.  
 (Cross out if you would not consider presenting a joint case).

Signature of submitter: [Signature] Date: 23-2-09  
 (or person authorised to sign on behalf of person making submission).

Please note that all submissions are made available for public inspection.



The parts of the proposed plan change that my submission relates to are:  
 (Give clear references if possible e.g. reference number, policy x, rule y)

6.4.0 A

6.4.12, 6.4.12 A, 15.2.2 Appendix 2A

**My submission is:**

(Include whether you support, oppose, or wish to have amended the parts identified above, and give reasons)

OPPOSE, AND WISH TO HAVE AMENDED

I seek the following decision from the local authority:

(Give precise details e.g. changes you would like made)

CHANGES AS IDENTIFIED

**SUBMISSIONS MUST BE RECEIVED BY 5.00 PM, MONDAY 9 MARCH 2009.**

Please fold and secure with a small piece of tape.

FreePost Authority ORC 1722



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

Attention Policy Team

2

W J Arthur  
Cairnmuir Road  
Cromwell

To : Otago Regional Council

Re : Proposed Plan Change 1C

My submission is that the wording of Clause 6.4.0A is too restrictive in its present form- in particular the wording... "take is no more than that required for the intended purpose of use"

On any irrigation scheme it is vitally important that the quantity at the take will be sufficient to provide the necessary quantity for the point of use.

However efficient the irrigation system is it is inevitable that there will be some water losses during the transport and/or storage of the water, and there must be some allowance made in the quantity approved to allow for this . The losses may result from many different causes including such things as evaporation, ground seepage, water race length,etc, and the quantity will vary depending on the peculiarities of the particular situation.

If the "take" quantity is no more than the "use" quantity then it is likely to be insufficient to irrigate the intended area, which will be to the detriment of the economy of the region. It is very important that due consideration be given to the economic benefits that accrue from land irrigation. There is an absence of recognition to this within these documents.

Clause 6.4.0A is the most important in this whole section because it determines the water take quantity.

Changes to 6.4.0A that I would like to see made are:

Add words "to provide" after the word "required" at the end of the second line

Under "Principal reasons for adopting" first line replace the word "avoided" with the word "minimised".

Note that these suggested changes fit with your own description in 6.4.0 B "Infrastructure is fit for purpose if it is working as designed to work,with no more than minor wastage of water".

Clause 6.4.12, 6.4.12A, 15.2.2, Appendix 2 A

WHAT A MESS ! I Do not know where to start. They are all interrelated and warrent being treated in a chapter of their own, in a straightforward way that Water Management Committees [yes, they deserve capitals, and one name is sufficient] can read, understand, and act upon.

What is different about water rationing [rule 6.4.12 ] than water managing [ rule 15.2.2.1] that requires a separate set of rules?

Take out the word “or” between [a] and [b] of 6.4.12 A and it would cover everything.

What is different about a “committee” and a “group” that requires a different set of rules?

What is difference in function and makeup between an ‘existing water allocation committee’ and a “water management group”?

Why do the committees have to become a sub-committee of the Council?- Obviously just a Council control device.

Why does the committee membership require the approval of the Council before acceptance?

Your rules give the Council all the rights, and the Committee all the responsibilities and no rights of reply. What if the Council and the Committee cannot agree? What avenue has a Committee got for Abitration? What happens if the Council sacks the Committee? Who is then responsible to Council for the area and its consents and sorting out the differences with Council?

It seems the rules have been drawn up totally from a Council control perspective with no consideration for the other parties. Please show me where I am wrong.

This does not look like the basis for good working relationships. It needs to be more of a partnership basis if it is to succeed.

All I can say is that you need to have another go at this!

Rule 15.3.1 – Thank you, we look forward to the Council assisting by the provision of such information. Please include an additional item [ e ] Economically priced water measuring devices/systems.

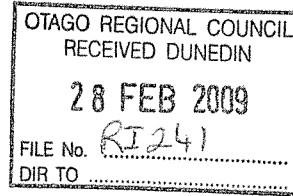
16



26 February 2009

Otago Regional Council  
Private Bag 1954  
Dunedin 9054

Attention Policy Team



File:  
Your ref:

Dear Fraser,

**Submission: Proposed Regional Water Plan Change 1C Water Allocation & Use**

I am pleased to provide you with QLDC's submission on proposed Plan Change 1C. The proposed Plan Change was considered by the Strategy Committee on 10 February 2009. It resolved that the following submission be made on behalf of Council:

**The parts of the proposed plan change that QLDC's submission relates to are:**  
The whole Plan Change.

**QLDC's submission is:**

Support the proposed provisions in that they will assist in achieving sustainable management of water resources and contribute to meeting the identified Community Outcomes for the District, in particular:

- Sustainable growth management.
- A safe and healthy community that is strong, diverse and inclusive for people of all age groups and incomes.
- Effective and efficient infrastructure that meets the needs of growth.

QLDC is a manager of significant community water supplies throughout Queenstown Lakes District. It wishes to promote sustainable use and management of water resources. This includes measures that will enhance the reliability and quality of water supply for the local community, both now and in the future.

**QLDC seeks the following decision from the local authority:**

That ORC confirms that when considering Policy 6.4.0A, the intended purpose of use will recognise that community water supplies will need to make provision for identified future growth in the area.

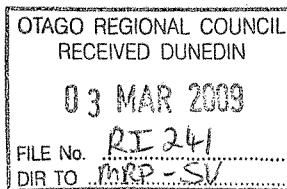
That, subject to the interpretation of intended purpose of use, proposed Plan Change 1C be approved.

Council wishes to be heard in support of its submission, and would be willing to consider presenting a joint case at the Hearing.

Yours sincerely

Philip Pannett  
General Manager Policy and Planning

[philipp@qldc.govt.nz](mailto:philipp@qldc.govt.nz)



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**Submission on Proposed Plan Change 1C to the Regional Plan:  
Water for Otago under Clause 6 of the First Schedule to the  
Resource Management Act 1991**

To: Policy Team  
Otago Regional Council  
Private Bag 1954  
DUNEDIN 9054

Name of submitter: Environment Southland

This is a submission on *Proposed Plan Change 1C - Water Allocation and Use* to the Regional Plan: Water for Otago.

The specific provisions of Proposed Plan Change 1C that Environment Southland's submission relates to are:

Environment Southland's submission contains some general comments on the entire plan change and also comments on specific provisions as listed below:

6. Water Quantity

Surface Water and Connected Groundwater Takes	Policy 6.4.1A	Page 10
Groundwater Takes	Policy 6.4.10A	15
	Policy 6.4.10C	16

16. Information Requirements

5A Schedule of equations to determine stream depletion effects of the take of groundwater	Requirement to determine stream depletion on surface water	Page 78
	Calculation of stream depletion effect and allocation to surface water	79

**Environment Southland's submission is:**

General Comments

Environment Southland thanks Otago Regional Council for sending it the relevant documentation regarding Plan Changes 1B (Minimum Flows) and 1C (Water Allocation and Use). Environment Southland is very interested in the policy direction being taken, particularly the new provisions encouraging collaborative approaches to water management in Plan Change 1C, and intends to keep a "watching brief" as the provisions go through the planning process.

As Otago Regional Council will be aware, some groundwater and surface water resources cross the Otago/Southland regional boundary. For example, the Waipahi and Mokoreta Rivers. Where this occurs, the effect of the two different management regimes needs to be considered. In the case of the Mokoreta River, this water body falls within the area covered by the Water Conservation (Mataura

River) Order 1997, which is a national instrument that both Councils must apply. A recent consent granted by Otago Regional Council to take surface water from the Mokoreta River did not reflect the requirements contained in the Water Conservation Order. Environment Southland therefore suggests that Otago Regional Council may wish to acknowledge the Water Conservation Order within the Regional Plan: Water for Otago.

### **Specific Comments**

Policy 6.4.1A – Environment Southland comments that its policy framework for managing the stream depletion effects of groundwater resources that are hydraulically connected to surface water is considerably more conservative than that proposed by Otago Regional Council. It is noted that Environment Canterbury has a similar policy framework to Environment Southland.

Policy 6.4.10A – Environment Southland comments that other regional councils use Land Surface Recharge (LSR) rather than mean annual recharge to determine allocation volumes. This is also the approach set out in the proposed National Environmental Standard on Ecological Flows and Water Levels and is much more conservative than mean annual recharge. Mean annual recharge includes all recharge types, including groundwater recharge from surface water, therefore Otago Regional Council's proposed groundwater allocation framework could affect surface water allocation. Further, both Environment Southland and the proposed National Environment Standard use a 30% threshold rather than the 50% threshold proposed by Otago Regional Council. Environment Southland also queries how Otago Regional Council's proposed groundwater allocation framework addresses aquifers with short recharge residence times.

Policy 6.4.10C – Environment Southland comments that this policy appears to prevent any lowering of artesian pressure, which is essentially a ban on all takes from confined aquifers. This does not appear to be consistent with the intention of the policy as outlined in the explanation.

Schedule 5A: Schedule of equations to determine stream depletion effects of the take of groundwater – Environment Southland comments it is surprised that the Bekesi and Hodges and Jenkins equations are specified in this schedule as it understands that the Hunt methodologies are becoming the national standard. Environment Southland's Proposed Regional Water Plan does not define a specific technique to be used for the assessment of streamflow depletion but instead requires consent applicants to demonstrate that the techniques applied are appropriate to the hydrogeological setting from which the abstraction is proposed. This approach recognises that there will inevitably be advances in assessment techniques over the lifetime of the plan and enables the utilisation of the best available assessment methodology.

Environment Southland also comments that Schedule 5A makes no mention of using models for determining cumulative effects.


### **Environment Southland seeks the following decision from Otago Regional Council:**

- For groundwater and surface water resources that cross the Otago/Southland boundary, Environment Southland requests Otago Regional Council give consideration to the effect of two different management regimes and how the Water Conservation (Mataura River) Order 1997 will be given effect to. For example, under Policy 6.4.1A, Otago Regional Council could grant consents for groundwater takes with no minimum flows in circumstances where Environment Southland would impose a minimum flow. In the Mokoreta River catchment, this means that Otago Regional Council and Environment Southland will be applying the Water Conservation Order differently.



- Environment Southland also requests that Otago Regional Council reviews Policies 6.4.10A and 6.4.10C and Schedule 5A in light of the comments above.

**Environment Southland does not wish to be heard in support of its submission.**

  
.....  
Warren Tuckey  
**Director of Environmental Management**

27 February 2009

**Address for service:** Environment Southland  
Private Bag 90116  
Invercargill 9840

**Telephone:** 03 211 5115

**Fax:** 03 211 5252

**Email:** [service@es.govt.nz](mailto:service@es.govt.nz)

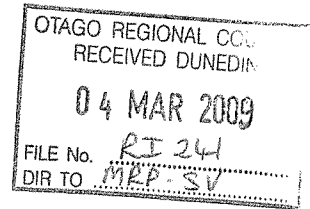
**Contact person:** Fleur Rodway, Resource Planner



**SUBMISSION ON THE OTAGO REGIONAL COUNCIL'S PUBLICLY NOTIFIED PLAN CHANGE 1C (WATER ALLOCATION AND USE) TO THE REGIONAL PLAN: WATER FOR OTAGO UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991**

18

**To:** Policy Team  
Otago Regional Council  
Private Bag 1954  
**DUNEDIN**



**Submission on:** Proposed Plan Change 1C (Water Allocation and Use)

**Name:** HW Richardson Group Ltd ('HWRG Ltd')

**Address:** C/- Mitchell Partnerships  
PO Box 489  
**DUNEDIN**

This submission relates to proposed Plan Change 1C in its entirety.

---

**Submission 1**

1. The specific provision of Proposed Plan Change 1C that HWRG Ltd's submission relates to is as follows:

***Policy 6.4.2A***

2. Policy 6.4.2A is opposed by HWRG Ltd. Policy 6.4.2A allows for the granting of replacement consents within primary allocations only for a rate and volume of water no more than has been historically accessed under the previous consent. Effectively this would reduce a primary allocation to either:
  - (a) The level at which a resource may be physically taken (i.e. constrained by hydraulic limitations)
  - (b) The amount of water which has actually been used for the intended purpose.

The policy explanation notes that in circumstances where a primary allocation cannot be physically taken by a user, it cannot be re-allocated for another use, and should the initial user require further water it will only be issued as a supplementary allocation (available in periods of high flow), or an alternative source. Further clarification is required as to whether existing consent holders retain priority on supplementary consents in circumstances where their allocated volume cannot be achieved because of physical constraints or if supplementary consents will be considered on a first-in first-served basis.

3. HWRG Ltd seek the following decision from the Otago Regional Council:

***Amend Policy 6.4.2A to provide further clarification as to whether existing consent holders retain priority on supplementary consents in circumstances***

*where their allocated volume cannot be achieved because of physical constraints or if supplementary consents will be considered on a first-in first-served basis.*

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### Submission 2

1. The specific provision of Proposed Plan Change 1C that HWRG Ltd's submission relates to is as follows:

***Policy 6.4.12***

2. Policy 6.4.12 is supported by HWRG Ltd. However there exists a need for more direct input from the ORC. Whilst not wanting to diminish the ability of the water management group, there needs to be some independent approval provided by the ORC in the decision making process.
3. HWRG Ltd seek the following decision from the Otago Regional Council:

***Amend Policy 6.4.12 to include provision for more direct input and independent approval of a water allocation committee's proposed actions by the Otago Regional Council to minimize conflicts of interest and vested interests that may arise from an allocation committee being made up of consent holders.***

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### Submission 3

1. The specific provision of Proposed Plan Change 1C that HWRG Ltd's submission relates to is as follows:

***Policy 6.4.12A***

2. Policy 6.4.12A is supported by HWRG Ltd. However, clarification of the differences between water allocation committees and water management groups is required to assess how they operate, what their powers are and what the implications of this are. While self-monitoring and self-management have proven powerful tools, this is only true in circumstances where well defined parameters and accountability have been established. Further detail of these matters is required.
3. HWRG Ltd seek the following decision from the Otago Regional Council:

***Amend Policy 6.4.12A and the accompanying explanation to provide better clarification of the differences between water allocation committees and water management groups is required to assess how they operate, what their powers are and what the implications of this are.***

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### Submission 4

1. The specific provision of Proposed Plan Change 1C that HWRG Ltd's submission relates to is as follows:

***Method 15.2.2 Water allocation committees and water management groups***

2. Method 15.2.2 is supported by HWRG Ltd. However, there exists a need for more direct input to water management groups from the ORC. Whilst not wanting to diminish the ability of the water management group, there needs to be some independent approval provided by the ORC in the decision making process. This will help to ensure a consistent decision making process within and between water management groups and that the objectives and policies of the Water Plan are being met by the actions of these groups in a consistent manner.
3. HWRG Ltd seek the following decision from the Otago Regional Council:

***Amend Method 15.2.2 to allow for the creation of water management groups but with some independent approval provided by the ORC in a group's decision making process.***

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**Submission 5**

1. The specific provision of Proposed Plan Change 1C that HWRG Ltd's submission relates to is as follows:

***Method 15.8.1A***

2. Method 15.8.1A is opposed by HWRG Ltd. Further clarification as to how the size of a supplementary allocation block has been calculated/determined is required to provide greater certainty as to whether the allocation blocks assigned to various catchments are appropriate.
3. HWRG Ltd seek the following decision from the Otago Regional Council:

***Amend Method 15.8.1A Methodology for determining supplementary allocation to include the methodology or reasoning for how the supplementary allocation blocks for the various catchments have been calculated/determined.***

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**Submission 6**

1. The specific provision of Proposed Plan Change 1C that HWRG Ltd's submission relates to is as follows:

***Information Requirement 16.3.1.4A***

2. Information Requirement 16.3.1.4A is opposed by HWRG Ltd. The requirement to describe all possible sources of water, with an assessment of the economic, social, environmental and cultural costs and benefits of taking from each source may not be appropriate for all circumstances, particularly for smaller abstractions and temporary abstractions. While it is recognized that such a requirement is useful in ensuring water is allocated and used in as efficient a manner as possible, such an assessment may be well beyond the resources of many water users. HWRG Ltd considers it would be more appropriate for this type of assessment of alternatives to incorporate a trigger level to undertake such an extensive assessment.

3. HWRG Ltd Seek the following decision from the Otago Regional Council:

***Amend Information Requirement 16.3.1.4A to incorporate (an) appropriate trigger level(s) for the provision of an assessment describing all possible sources of water, with an assessment of the economic, social, environmental and cultural costs and benefits of taking from each source.***

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#### **Submission 7**

1. The specific provision of Proposed Plan Change 1C that HWRG Ltd's submission relates to is as follows:

***Deletion of the definition of Use within the Glossary***

2. Oppose the deletion of the definition of Use from the Glossary. Given the inclusion of the phrase "and use" throughout Chapter 12 Rules it would be appropriate to define the meaning of "use" in terms of consumptive and non-consumptive uses of water.
3. HWRG Ltd seek the following decision from the Otago Regional Council:

***Amend the definition of Use to better reflect the consumptive and non-consumptive manners in which water may be utilized.***

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#### **Submission 8**

1. The specific provision of Proposed Plan Change 1C that HWRG Ltd's submission relates to is as follows:

***Appendix 2A Water Management Groups***

2. Appendix 2A is supported by HWRG Ltd. However, the information contained within Section 2A.1 and 2A.2 relating to the criteria to establish a water management group and particularly a water management group's functions require further detail and transparency. Also, more information regarding a water management groups reporting requirements to the Otago Regional Council are required to ensure consistency of rule between groups to prevent tension and conflicts of interest arising.
3. HWRG Ltd seek the following decision from the Otago Regional Council:

***Amend Appendix 2A to provide greater detail and transparency regarding water management group's criteria for appointment, their functions and their reporting requirements.***

4. HWRG Ltd does wish to be heard in support of its submission

5. If others make a similar submission, HWRG Ltd would be prepared to consider presenting a joint case with them at any hearing.

**Signature:** Joanne Dowd  
Joanne Dowd, on behalf of HW Richardson Group Ltd.

**Date:** 02 March 2009

**Address for service:** C/- Mitchell Partnerships  
PO Box 489  
Dunedin  
Attn: Joanne Dowd

**Telephone:** (03) 477 7884

**Facsimile:** (03) 477 7691





**SUBMISSION FORM**  
**Proposed Plan Change 1C: Water Allocation and Use**  
**to the Regional Plan: Water for Otago**  
**December 2008**

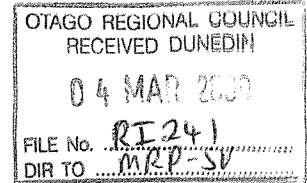
*Form 5, Clause 6 of the First Schedule, Resource Management Act 1991*

**19**  
Office Use Only

Full name of submitter: Hamish Winter

Name of organisation (*if applicable*):

Postal Address:      Number/Street: 320 McPherson Rd  
                                 Suburb: 6H RD  
                                 Town/City: Oamaru  
                                 Postcode: 9493



Telephone: 03 431 3665

Fax:

Email:

Contact person:

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

If others make a similar submission, I will not consider presenting a joint case with them at a hearing.

Date: 3/03/2009 17:30:15

**Please note that all submissions are made available for public inspection.**

**Signatures are not required for submissions made electronically.**

**Submissions must be received by 5pm, Monday 9 March 2009.**

**The parts of the proposed plan change that my submission relates to are:**

*(Give clear references if possible e.g. reference number, policy x, rule y)*

I oppose section 12.1.4.7 setting the minimum flow for Welcome Creek secondary allocation at 1000l/s.

I oppose section 12.1.4.4A – setting the minimum flow for Welcome Creek primary allocation at 700l/s.

I oppose section 6.4.2A where if you don't use all your consent some of the consent can be taken off the consent holder.

**My submission is:**

*(Include whether you support, oppose, or wish to have amended the parts identified above, and give reasons)*

I Oppose Sections 12.1.4.7 & 12.1.4.4A A. I do not believe the ecosystem has been sufficiently studied to establish whether either of these flow levels is enough, too much, or indeed so much that the creek can never flow this high. B. The amount of flow monitoring of the creek is woefully inadequate to establish these levels as bench marks. C. A complete lack of consultation, I still have to hear from Council, surely I am 'affected' by this change The vast majority of the flow in Welcome creek is produced by the irrigation performed in the surrounding area. If irrigation were to stop or decrease Welcome stream flows would decrease, possibly markedly, who knows? I oppose Section 6.4.2A Having the possibility of losing some of your consented allocation because you fail to use it is ridiculous. Is this an attempt by council to begin selling water rights? This sort of rule change will encourage the over watering and water logging of soils so that consented volumes remain safe for the user to 'have in reserve' Irrigation annual volumes are dictated by the season, we cannot have the possibility of loss of consent volume hanging over us.

**I seek the following decision from the local authority:**

*(Give precise details e.g. changes you would like made)*

Sections 12.1.4.7 & 12.1.4.4A I ask that council not place a minimum flow on Welcome Creek, the irrigators currently using the system have maintained and cared for the creek of their own volition at no cost to Council. Welcome Creek is a healthy vibrant eco system the way it is, placing rules for allocation upon it courts disaster by upsetting a delicate balance, leave it alone. Section 6.4.2A I ask that Council abandon this foolish idea and leave consent holders with their current consents as they are, or be held accountable for the decrease in land value suffered by us the consent holders caused by decreases in allocated takes.

**SUBMISSIONS MUST BE RECEIVED BY 5.00PM, MONDAY 9 MARCH 2009****Please send submissions to:**

Email: [policy@orc.govt.nz](mailto:policy@orc.govt.nz)

Post: Attn: Policy Team, Private Bag 1954, Dunedin 9054

Fax: (03) 479 0015 (Attn: Policy Team)

Deliver: 70 Stafford Street, Dunedin; or

William Fraser Building, Dunorling Street, Alexandra; or

The Station, 1<sup>st</sup> Floor, Cnr Shotover and Camp Streets, Queenstown



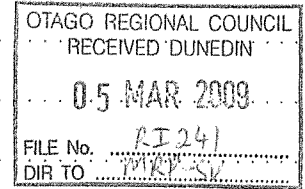
**SUBMISSION FORM**  
**Proposed Plan Change 1C Water Allocation and Use**  
**to the Regional Plan: Water for Otago**

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

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Office use only

Full name of submitter: Jonathan Davis  
 Name of organisation (if applicable): Waitensea Ltd  
 Postal address: 17 Clark st  
Sumner, Christchurch  
 Telephone: 033342070  
 Email: \_\_\_\_\_  
 Postcode: 8081  
 Fax: 033802072  
 Contact Person: As above



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

If others made a similar submission, I will consider presenting a joint case with them at a hearing.  
 (Cross out if you would not consider presenting a joint case).

Signature of submitter: [Signature] Date: 2/3/09  
 (or person authorised to sign on behalf of person making submission).

**Please note that all submissions are made available for public inspection.**

**The parts of the proposed plan change that my submission relates to are:**

(Give clear references if possible e.g. reference number, policy x, rule y)

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**My submission is:**

(Include whether you support, oppose, or wish to have amended the parts identified above, and give reasons)

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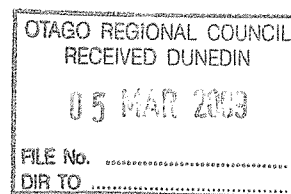


Parts of the proposed plan change that my submission relates to are:

Section 6.4.2A – Oppose

Section 12.1.4.4.A – Oppose

Section 12.1.4.7 – Oppose



My submission is:

**A/ I oppose section 6.4.2A where if you don't use all your consent some of the consent can be taken off the consent holder.**

This is because of the fact that because you don't use all of the consented water prior to the consent renewal does not mean that in the future more water is not needed.

Often the farm will be operating at its allowed maximum intake but will not use its allowed annual volume. The annual volume can vary hugely. In 1988 most farms started irrigation in August and stopped irrigating in May 1989. The irrigation needs to be reliable for every season.

If this condition was in place this would result in consent holders pumping water to waste – just to ensure that they didn't lose any of their consented water.

**I seek the following decision from the local authority –**

That consent conditions are not altered unless agreed to by the consent holder.

**B/ I oppose section 12.1.4.4A – setting the minimum flow for Welcome Creek primary allocation at 700l/s.**

This minimum flow has been set without

1/ Looking at the habitat model to see what level of flow is required for the ecosystem.

2/ Considering the mean annual low flow data.

3/ Any community consultation. There are only 5 – 6 consent holders on Welcome Creek. A letter should have been sent to consent holders to hear their views.

4/ Any data from the Creek. The first information from Welcome Creek at Steward road started being collected in November 2008 – this is not enough time to set a min flow on the creek.

The reality is that a lot of the water in Welcome Creek is bywash. If you stop irrigation you will reduce the amount of water in the Creek.

**I seek the following decision from the local authority –**

That no minimum flow is put on Welcome Creek as the Creek is healthy and has been well looked after by the current irrigators. By putting rules on Welcome Creek ORC could well break something that is operating very well at the moment. If the reliability of irrigation reduced then more irrigation water would be used as the farmers would have to have the soil “topped” up in case the Creek went onto restrictions.

**C/ I oppose section 12.1.4.7 setting the minimum flow for Welcome Creek secondary allocation at 1000l/s.**

This minimum flow has been set without

- 1/ Looking at the habitat model to see what level of flow is required for the ecosystem.
- 2/ Considering the mean annual low flow data.
- 3/ Any community consultation. There are only 5 – 6 consent holders on Welcome Creek. A letter should have been sent to consent holders to hear their views.
- 4/ Any data from the Creek. The first information from Welcome Creek at Steward road started being collected in November 2008 – this is not enough time to set a min flow on the creek.

The reality is that a lot of the water in Welcome Creek is bywash. If you stop irrigation you will reduce the amount of water in the Creek.

**I seek the following decision from the local authority –**

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Jonathan Davis