

<b>Submission</b>	107
<b>TO:</b>	Otago Regional Council
<b>DATE:</b>	5 May 2009
<b>PLAN CHANGE:</b>	Proposed Plan Change 1C (Water Allocation and Use) to the Regional Plan: Water for Otago
<b>DESCRIPTION OF THE PLAN CHANGE</b>	<p>The plan change proposes to add provisions to manage the taking of water, including:</p> <ul style="list-style-type: none"> <li>• Managing water as a connected resource;</li> <li>• Recognising when groundwater is closely connected to surface water.</li> <li>• Giving preference to local water sources for local uses of water; and</li> <li>• Encouraging collaborative approaches by water users;</li> </ul>

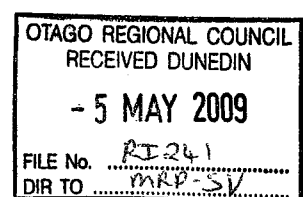
**Submitter(s):**

~~Te Rūnanga o Moeraki, Kāti Huirapa Rūnanga ki Puketeraki, Te Rūnanga o Ōtākou, and Hokonui Rūnanga.~~

**We wish to lodge a further submission on the above plan change, as outlined in Attachment One.**

**Te Rūnanga o Moeraki, Kāti Huirapa Rūnanga ki Puketeraki, Te Rūnanga o Ōtākou, and Hokonui Rūnanga have reviewed the summary of submissions on proposed Plan Change 1C (Water Allocation and Use) and wish to comment on those submissions that directly affect the primary concerns of Nga Rūnanga.**

**We do wish to be heard in support of this submission at a hearing, and we request an opportunity to expand on our submission. If others make a similar submission, we will consider presenting a joint case with them**



*Further submission lodged on behalf Te Rūnanga o Moeraki, Kāti Huirapa  
Rūnanga ki Puketeraki , Te Rūnanga o Ōtākou, and Hokonui Rūnanga*

Nahaku noa  
Na



**Chris Rosenbrock**  
Manager

**Address for Service:**

Tim Vial  
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KTKO Ltd,  
PO Box 446  
Dunedin 9054  
Phone Number: (DD) (03) 471 5487  
E-mail: tim@ktkold.co.nz

**Attachment One: Further Submissions on Plan Change 1C:  
Water Allocation and Use**

<b>Submitters name</b>	<b>Submitter number</b>	<b>Reference number</b>	<b>Summary of submission</b>	<b>Position</b>	<b>Reason</b>
Environment Southland	17	13.48	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. Environment Southland suggests that the ORC may wish to acknowledge the Water Conservation (Mataura River) Order 1997 within the Regional Plan: Water for Otago.	Support	Nga Rūnanga supports the acknowledgement of the Water Conservation (Mataura River) Order 1997 in the Regional Plan: Water for Otago
Hamish Winter	19	72	That Council not place a minimum flow on Welcome Creek. Opposes the setting of a minimum flow for secondary [supplementary] allocation at 1000 l/s.	Oppose	Nga Rūnanga opposes the removal of minimum flows for Welcome Creek/ Whakapapa Ariki. The removal of minimum flows would be inconsistent with Policy 6.6A.6 of the Regional Plan Water for Otago, which requires the setting of an environmental flow and level regime that recognises and provides for the relationship of Kāi Tahu and their culture and traditions with Whakapapa Ariki.
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Otago Fish and Game Council	21	137	Wish to see rules and objectives linking quantity and quality to protect and enhance waterways. Prohibit further water abstraction for activities on land where significant effects on water quality are likely, or in catchments where water quality is poor or degraded. Council needs to take a strong lead on this issue.	Support	Nga Rūnanga similarly wishes to see rules and objectives linking quantity and quality to protect and enhance waterways.
Otago Fish and Game Council	21	137	Objective 6.3.1 could read: "To retain and <u>reinstate</u> flows in rivers sufficient to maintain their life-supporting capacity for aquatic ecosystems, and their natural character."	Support	Nga Rūnanga supports the reinstatement of flows to maintain the life-supporting capacity of aquatic ecosystems.
Otago Fish and Game Council	21	137	Policy 6.4.10 allows all flow above natural mean flow to be extracted, when these flows may be important for flushing and instream health in small streams. Wish the Council to amend the Plan so that flat lining of small streams does not occur and some degree of flushing flows are maintained.	Support	Nga Rūnanga shares the submitter's concerns regarding the flat lining of small streams and the maintenance of flushing flows.
Henry Robert Barry Zwies	23	72, 74, 112.1,113	That no minimum flow is put on Welcome Creek.	Oppose	Nga Rūnanga opposes the removal of minimum flows for Welcome Creek/ Whakapapa Ariki. The removal of minimum flows would be inconsistent with Policy 6.6A.6 of the Regional Plan Water for Otago, which requires the setting of an environmental flow and level regime that recognises and provides for the relationship of Kāi Tahu and their culture and traditions with Whakapapa Ariki.

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William John Pile	34	72	Opposes Rule 12.1.4.3. There should be no minimum flow put on Welcome Creek.	Oppose	Nga Rūnanga opposes the removal of minimum flows for Welcome Creek/ Whakapapa Ariki. The removal of minimum flows would be inconsistent with Policy 6.6A.6 of the Regional Plan Water for Otago, which requires the setting of an environmental flow and level regime that recognises and provides for the relationship of Kāi Tahu and their culture and traditions with Whakapapa Ariki.
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Otago Water Resource Users Group (OWRUG)	41	25	Policy 6.4.12A - Water management groups. Requests a policy that provides for a 35 year term for Water Management Groups provided provision has been made for instream flows	Oppose	Nga Rūnanga opposes the granting of water take consents for 35 years.
Federated Farmers of New Zealand	42	30	Policy 6.4.19 - Term of permit. Reinstate policy as stated in plan. Retain specific policy providing for maximum term consents.	Oppose	Nga Rūnanga opposes the granting of water take consents for a maximum term of 35 years.
Horticulture New Zealand	44	30	Policy 6.4.19 - Term of permit. Retain Policy 6.4.19.	Oppose	Nga Rūnanga opposes the granting of water take consents for a maximum term of 35 years. Consistent with precautionary approach water takes should be granted for a reduced term, and should include a review clause.
Horticulture New Zealand	44	100	Rule 12.2.3.4 - Restricted discretionary considerations. Delete condition 12.2.3.4 (xviii).	Oppose	Nga Rūnanga opposes the deletion of Rule 12.2.3.4 (xviii). Council should exercise discretion over the duration of water take consents.
The Director-General of Conservation	48	18	The following amendment be made to Policy 6.4.10A: "... <i>(ii) 35% of the calculated mean annual recharge for those aquifers not specified in Schedule 4A...</i> "	Support	Nga Rūnanga supports the adoption of a precautionary approach to the allocation of groundwater.
The Director-General of Conservation	48	18	Policy 6.4.10A. The following amendment be made to the Explanation: "... <i>(i) The individual take would not cause the cumulative take from the aquifer to exceed 35% of the mean annual recharge of the aquifer, or the maximum allocation volume listed in Schedule 4A;</i> "	Support	Nga Rūnanga supports the adoption of a precautionary approach to the allocation of groundwater.



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The Director-General of Conservation	48	98	That the following amendments are made to Rule 12.2.3.2A: "(a) The volume sought is within: ...(ii) 35% of the calculated mean annual recharge for any aquifer not specified in Schedule 4A;	Support	Nga Rūnanga supports the adoption of a precautionary approach to the allocation of groundwater.
The Director-General of Conservation	48	100	That the following amendment is made to Rule 12.2.3.4 (Restricted discretionary considerations): (xxii) Any impact on ecological and/or recreational and/or cultural values."	Support	Nga Rūnanga supports the inclusion of cultural values as a restricted discretionary activity consideration.
The Director-General of Conservation	48	104	The following amendment be made to the fourth paragraph of Principal reasons for adopting [12.2]: "The taking and use of groundwater under Rules 12.2.2.1 to 12.2.2.6 will have no more than minor adverse effects on the aquifer from which the water is taken, any wetland, lake or river, and the ecological, recreational and cultural values contained within these, or on any other person taking water..."	Support	Nga Rūnanga supports consideration of cultural values as a reason for adopting Rules 12.2.2.1 to 12.2.2.6.
Trustpower Ltd	51	30	Retain Policy 6.4.19 – Term of permit. Full term consents ought to be granted.	Oppose	Nga Rūnanga opposes the granting of water take consents for a full term. Consistent with precautionary approach water takes should be granted for a reduced term, and should include a review clause.



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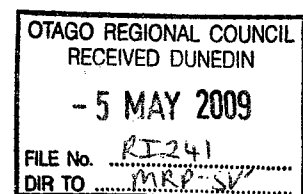
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Nahaku noa  
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**Chris Rosenbrock**  
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**Address for Service:**

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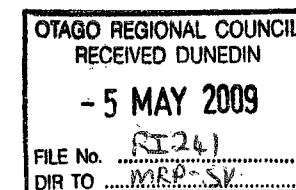
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**FURTHER SUBMISSION IN SUPPORT OF OR OPPOSITION TO SUBMISSIONS  
ON PLAN CHANGE 1C TO THE OTAGO REGIONAL PLAN (WATER ALLOCATION AND USE)  
UNDER CLAUSE 8 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991**



To: Otago Regional Council  
Private Bag 1954  
DUNEDIN 9054

From: Contact Energy Limited  
Level 1  
Harbour City Tower  
29 Brandon Street  
P.O. Box 10-742  
WELLINGTON

