



FURTHER SUBMISSION	
<i>Form 6, Clause 8 of the First Schedule, Resource Management Act 1991.</i>	
TO:	Otago Regional Council
DATE:	9 October 2015
PLAN CHANGE:	Proposed Plan Change 5A (Lindis: Integrated water management) to the Regional Plan: Water for Otago.
KĀI TAHU KI OTAGO PAPATIPU RŪNAKA	Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, and Te Rūnanga o Ōtākou (collectively Kāi Tahu).
Kāi Tahu does wish to be heard in support of this further submission at a hearing, and requests an opportunity to expand on this submission. If others make a similar submission, we will consider presenting a joint case with them.	

1. Decision Sought

Kāi Tahu **support in part** submission number 66, made by:

John Murray Neilson
22 Berwick Road
Woodside
RD1 Outram
9073
kmsanda@xtra.co.nz

2. Particular points of the submission which are supported are:

The amendment of the minimum summer flow to 1000 litres/second or higher.

3. Reasons for the Decision Sought

Kāi Tahu agree with the submitter that a minimum flow of 1,000 l/s is required to ensure the connectivity between waterbodies, which, as set out in the submission, is a requirement of Policy B1 of the National Policy Statement for Freshwater (NPSFM). Kāi Tahu also agree that Appendix 1 of the NPSFM, including both compulsory national values and additional national values, contain relevant considerations to the setting of a minimum flow for the Lindis River.

101

For the above reasons Kāi Tahu seek that the submission in regards to the minimum summer flow is **allowed**.

Nahaku noa, Na



Chris Rosenbrock
Manager

Address for Service:

Tim Vial

Senior Planner

KTKO Ltd,

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Dunedin 9054

Phone Number: (DD) (03) 471 5480

E-mail: tim@ktkoltd.co.nz

NOTE: We note that a copy of this further submission must be served on the original submitter within 5 working days after making the further submission to the local authority in accordance with Schedule 1, Clause 8A(2) of the Resource Management Act 1991.



102



Otago Regional Council
Private Bag 1954
Dunedin 9016

07/10/2015

Form 6 - Further submission in support of, or in opposition to, submission on publicly notified proposed policy statement or plan, change or variation

(Clause 8 of Schedule 1, Resource Management Act 1991)

To: Otago Regional Council

Name of person making further submission: Otago Fish and Game Council

This is a further submission on Proposed Plan Change 5A (Lindis River Integrated Management) to the Regional Plan Water (RPW).

The Otago Fish and Game Council (Fish and Game) is the statutory manager of sports fish and game within the Lindis catchment. This is an interest greater than that of the public generally.

Otago Fish and Game makes the following further submission.

Statutory managers of freshwater sports fish, game birds and their habitats

Otago Region

Cnr Hanover & Harrow Sts, PO Box 76, Dunedin 9054, New Zealand. Telephone (03) 477 9076 Facsimile (03) 477 0146
www.fishandgame.org.nz

301

Submitter reference / issue	Submitter name	Support / Opposition	Reasons
#55 -# 5 Minimum flow for the Lindis catchment	Federated Farmers – High Country	Oppose	The expiry of mining privileges in 2021 has been known for thirty years, and this time could have been used for transitioning to another source of water.
#55 - #6 Irrigation season primary allocation minimum flow	Federated Farmers – High Country	Oppose in part	Accept the statement that the “status quo is unsustainable”. Oppose the introduction of a summer minimum flow of 450 litres per second as this does not address the NPSFM requirements to address overallocation by restoring flows to rivers in order to maintain life-supporting capacity for ecosystems. A summer minimum flow of 450 lps does not meet this test.
#57 - #2 Overall approach	Federated Farmers of New Zealand Incorporated	Oppose	The NPS requires the phasing out of over-allocation within catchments in order to protect the life-supporting capacity of ecosystems. A summer minimum flow of 450 lps fails this test.
#57-#5 Policy 6.4.5 including transition timeframes	Federated Farmers of New Zealand Incorporated	Support in part	Fish and Game may be open to discussions about a transition framework provided that Fish and Game’s submission in support of a summer minimum flow of 1000 lps is introduced.
#57-#57	Federated Farmers of New Zealand Incorporated	Oppose	Retain references to Bendigo and Lower Tarras aquifers in Schedule 4B2
#57-#57	Federated Farmers of New	Oppose	Retain maps C5 and C6

	Zealand Incorporated		as notified. The inclusion of the Lindis River ribbon aquifer is necessary to ensure the health of the river and continuity with the minimum flow.
#56 - #2	Lindis Catchment Group Incorporated	Oppose	An integrated and holistic approach as requested by the submitter does not make up for a lack of meaningful flow in the lower Lindis river that provides for the life supporting capacity of this river.
#56 - #2 Overall approach-general opposition	Lindis Catchment Group Incorporated	Oppose	An integrated and holistic approach as requested by the submitter does not make up for a lack of meaningful flow in the lower Lindis river that provides for the life supporting capacity of this river.
#56 - #5 Policy 6.4.5, including transition timeframes	Lindis Catchment Group Incorporated	Support in part	Fish and Game may be open to discussions about a transition framework provided that Fish and Game's submission in support of a summer minimum flow of 1000 lps is introduced.
#56 - #15 Schedule 2A and 2B	Lindis Catchment Group Incorporated	Support	Support the retention of the existing flow recording sites for the purposes of the minimum flow.
#43 - #6 Irrigation season primary minimum flow	Upper Clutha Angling Club	Support	Fish and Game supports the Upper Clutha Angling Club's desire to see summer minimum flow of not less than 1000 litres per second applied to the river.
#68 - #5 Policy 6.4.5 including transition timeframes	Central Otago Environmental Society Incorporated	Support	Fish and Game supports the relief sought by the Central Otago Environmental Society to not see any further

			delays to implement the minimum flow.
#22 - #8 Schedule 2A – primary allocation limit	The Point Partnership	Oppose	There is a relationship between a minimum flow and a primary allocation limit, and Fish and Game’s desired summer minimum flow of 1000 lps cannot be met with a 1500 lps primary allocation limit without significantly reducing the reliability of supply for primary water permit holders at that higher allocation limit.
#22 - #56	Lindis Catchment Group Incorporated	Oppose	Retain maps B4 and B7 as notified.
#22 - #57	Lindis Catchment Group Incorporated	Support	As with Fish and Game’s initial submission, there is no reason for the RPW to place restrictions on takes from these aquifers over and above the allocation regime that has already been placed on these aquifers. Remove restrictions on taking as proposed by the relief sought by Contact Energy Limited.
#76 - #35 Supplementary allocation regime (minimum flow and allocation)	Contact Energy Limited	Support	Support the relief sought to add on specific dates. This will ensure that the plan change is consistent with the rest of the Regional Plan: Water.
#30-#31 Implementation – other requests	Bendigo Station	Support in part	Fish and Game can support new or “innovative” initiatives to manage flows within the overall context of a higher summer minimum flow, but not as an alternative to a higher summer minimum flow.

I wish to be heard in support of my further submission at any hearing convened.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'MHL'.

Peter Wilson
Environmental Officer
Otago Fish and Game Council

Corner of Hanover and Harrow Streets
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103

McKeague
Consultancy Ltd

OTAGO REGIONAL COUNCIL
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07 OCT 2015
FILE No. FA 41532
DIR TO ASST

Lindis Catchment Group Inc

FURTHER SUBMISSION

**Proposed Plan Change 5A (Lindis: Integrated water management) to the Regional Plan: Water for Otago
(Form 6, Clause 8 of the First Schedule, Resource Management Act 1991)**

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

Name of submitter: **Lindis Catchment Group Inc (LCG)**

Contact person: **Sally Dicey**
Consultant Environmental Planner, McKeague Consultancy Ltd

Address for service: **PO Box 1320, Dunedin 9054**
Email: sally@mckconsultancy.co.nz
Phone: **03 4774292 or 021 154 6568**

LCG wishes to be heard in support of its further submission.
If others make a similar submission, LCG will not consider presenting jointly with them at a hearing.
LCG has an interest in the proposal greater than the interest that the general public has.



Signature: _____ Date: 7 October 2015

Submitter that LCG's further submission relates to	Proposed Plan Change 5A Provision that the original submission related to	Part of the original submission that LCG's further submission relates to and if LCG support or oppose it	Reasons for LCG's support / opposition
<p>Lindis Catchment Group Inc. (Submitter Number 56)</p>	<p>Schedule 2A (3) – specific minimum flows for primary allocation takes</p> <p>Minimum flow of 750 L/s (1 October to 31 May)</p> <p>(ref # 30)</p>	<p>Support</p> <p>“Provisions that interlink the minimum flow effectively with the new primary allocation limit so that these tools can work as an integrated package.”</p>	<p>The Otago Regional Council (ORC) summary of submissions categorised this matter as “Implementation - Other requests - Not Applicable”.</p> <p>The Lindis Catchment Group (LCG) do not agree with this categorisation, and submit that this matter is relevant and applicable.</p> <p>As stated in LCG's original submission, “no account is taken in the section 32 report or proposed provisions of how a primary allocation limit works in combination with a minimum flow to impact on water availability and reliability” (row 7, p14).</p> <p>The ORC's Regional Plan: Water for Otago (RPW) clearly links these tools together to maintain sufficient flows (see for example Policies 6.4.3, 6.4.4, 6.4.5 and 6.4.6).</p> <p>These tools must be developed in an integrated manner to ensure effective limits are set.</p>
<p>Lindis Catchment Group Inc. (Submitter Number 56)</p>	<p>Schedule 2A (3) – specific minimum flows for primary allocation takes</p> <p>Primary allocation limit of 1,000 L/s Lindis catchment from confluence with Clutha/Mata-au to headwaters.</p>	<p>Support</p> <p>“Inclusion of new policies and rules granting primary allocation status to any take which has primary allocation status in relation to a tributary of the Clutha/Mata-Au (including the Lindis River and its tributaries) which is moved from that tributary of the Clutha River/Mata-Au to the main</p>	<p>The ORC summary of submissions categorised this as “Matters beyond the scope of the plan change - Not applicable”.</p> <p>LCG do not agree with this categorisation, and submit that this matter is within the scope of the plan change.</p> <p>The section 32 report repeatedly refers to Lindis irrigators transitioning towards the use of an alternative water source, and identifies this as both a benefit and a cost/risk in relation to the options considered for the management of surface water,</p>

Submitter that LCG's further submission relates to	Proposed Plan Change 5A Provision that the original submission related to (ref # 33)	Part of the original submission that LCG's further submission relates to and if LCG support or oppose it	Reasons for LCG's support / opposition
		stem of the Clutha River/Mata-Au."	<p>and also includes the transfer of water takes to the Clutha River/Mata-Au in the outcomes likely to result from the recommended management regime (section 6, p13 of section 32 report). However, the section 32 report fails to clearly and effectively assess this aspect of the recommended management regime, even though it is one of the assumptions underpinning this regime.</p> <p>No clear framework for this transition is included in PPC5A, and LCG consider this to be necessary, to enable irrigators to provide for their social and economic well-being while also maintaining and enhancing the environmental and cultural values associated with the Lindis Catchment.</p> <p>Accordingly, LCG submit that this is clearly within the scope of this plan change – if flows in the Lindis are to be maintained at an effective level, and one aspect of maintaining these flows is to use alternative water sources, then the Proposed Plan Change 5A (PPC5A) should recognise and provide for an effective transition to alternative sources.</p> <p>The ORC categorised Fish and Game's submission on transition matters as within the scope of PPC5A (ref # 5 - see below). This is inconsistent, and LCG's submission on this matter should also be treated as within the scope of PPC5A.</p>
Contact Energy Ltd - Daniel Druce (Submitter Number 76)	Policy 6.4.5, including transition timeframes (ref # 5)	Oppose LCG oppose Contact's submission	LCG seek a longer transition period and provisions, as outlined in LCG's original submission.

Submitter that LCG's further submission relates to	Proposed Plan Change 5A Provision that the original submission related to	Part of the original submission that LCG's further submission relates to and if LCG support or oppose it	Reasons for LCG's support / opposition
<p>Contact Energy Ltd - Daniel Druce (Submitter Number 76)</p>	<p>Matters beyond the scope of the Plan Change (ref # 33)</p>	<p>where it seeks that this policy should be retained as notified.</p> <p>Oppose</p> <p>LCG oppose Contact's submission where it seeks to provide for transparency and understanding of the level of ongoing allocation in the Lindis River and associated aquifers by publicly notifying such information.</p>	<p>LCG oppose Contact Energy's submission as it could be interpreted as a request for full notification for all water permit applications for abstraction from the Lindis Catchment. Given that PCC5A will result in a primary allocation limit and a minimum flow, LCG consider this to be inappropriate.</p> <p>LCG agree with the ORC categorisation of this - that this is a matter beyond the scope of the plan change.</p>
<p>Contact Energy Ltd - Daniel Druce (Submitter Number 76)</p>	<p>Rule 12.1.4 and mapping of the Lindis Catchment (ref # 36)</p>	<p>Oppose</p> <p>LCG oppose Contact Energy's submission where it seeks to retain Rule 12.1.4.4 as notified.</p>	<p>LCG oppose Contact Energy's support for the reasons outlined in LCG's original submission, including that the catchment boundary does not recognise the true geographical catchment boundary of the Lindis River.</p> <p>The implications of this, in terms of the long term management of water within the true boundary of the Lindis catchment, are potentially far-reaching, and will result in unnecessary complexity and uncertainty for the natural 'nested' catchment of the Lindis. Future decisions about sourcing water should not be limited or extinguished by an arbitrary approach to mapping.</p>
<p>Contact Energy Ltd - Daniel Druce (Submitter Number 76)</p>	<p>Schedule 4B.2 - Restrictions on groundwater takes (ref #38)</p>	<p>Oppose</p> <p>LCG oppose Contact Energy's submission where it seeks to amend Schedule 4B.2 by the addition of the Ardgour Valley Aquifer and the Lindis Alluvial Ribbon Aquifer (with appropriate map references).</p>	<p>LCG oppose Contact Energy's submission on the basis that a restriction on taking water from these aquifers during winter is not based on sufficient evidence that these takes have a discernible impact on lake levels or lake out flows. Winter takes are important to assist with frost fighting and also for the possibility of water harvesting for irrigation storage.</p>

Submitter that LCG's further submission relates to	Proposed Plan Change 5A Provision that the original submission related to	Part of the original submission that LCG's further submission relates to and if LCG support or oppose it	Reasons for LCG's support / opposition
<p>Fish and Game Council - Peter Wilson (Submitter Number 54)</p>	<p>Policy 6.4.5, including transition timeframes (ref # 5)</p>	<p>Support in part – LCG support in part Fish and Game's submission where it seeks to add other objectives, policies, methods, rules, and schedules to the RPW, to address transitioning from deemed permits</p>	<p>LCG support and agree with the transition matters listed by Fish and Game in (a) - (e) with the exception of (d).</p> <p>LCG agree that PPC5A needs to address the issue of transition from deemed permits to resource consents, regardless of water source, and that the s32 report and PPC5A do not adequately address matters of transition.</p> <p>As noted in LCG's original submission, PPC5A needs to include a package of provisions that recognises and reduces the complexity and challenges of all of these changes and minimises the adverse effects of these changes on irrigators and promotes balanced betterment to the core values of the Lindis Catchment water.</p> <p>LCG's submission to include transitional provisions (see ref # 33 in relation to primary allocation status) was categorised by the ORC as "Matters beyond the scope of the plan change - Not applicable". This is in contrast to the ORC's categorisation of Fish and Game's submission on transition matters. LCG submit that its submission is applicable and is within the scope of the plan change.</p>
<p>Fish and Game Council - Peter Wilson (Submitter Number 54)</p>	<p>Schedule 4B.2 - Restrictions on groundwater takes (ref # 38)</p>	<p>Support LCG support Fish and Game's opposition to the restriction on takes from the Bendigo and Lower Tarras Aquifers: "There shall be no take for</p>	<p>LCG agree with Fish and Game that the existence of resource consents to operate the Clutha/Mata-Au hydro scheme should not provide an open-ended and undefined ability for the RPW to place restrictions on water permits from these aquifers through Schedule 4B.2.</p>

Submitter that LCG's further submission relates to	Proposed Plan Change 5A Provision that the original submission related to	Part of the original submission that LCG's further submission relates to and if LCG support or oppose it	Reasons for LCG's support / opposition
<p>Gerald Telford (submitter number 28)</p>	<p>Matters beyond the scope of the Plan Change (ref # 33)</p>	<p>irrigation purposes between 1 May and 31 August inclusive. Other restrictions may be imposed on resource consents to help maintain lake levels".</p> <p>Support</p> <p>LCG support Mr Telford's submission that proactive management by ORC to occur.</p>	<p>ORC have categorized this matter as "Not applicable" and outside the scope of the plan change.</p> <p>LCG disagree with this categorisation and support Mr Telford's submission, including on this matter. LCG submit that provisions which enable proactive management are within the scope of PPC5A.</p> <p>A one size fits all approach is not appropriate across the whole of Otago, and certainly not for the Lindis Catchment. To set effective flow limits in the Lindis, the ORC need to recognise and address the unique characteristics of this catchment.</p> <p>Setting effective flow limits involves a fine balance between different values and interests. To maximise the gains for all values, including ecological, natural character and human use and cultural values, PPC5A needs to include provisions designed specifically for the environment and climate of the Lindis and the use of water in this catchment.</p>

104

OTAGO REGIONAL COUNCIL
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09 OCT 2015
FILE No. *PA 41538*
DIR TO *Tom D.P.*



Federated Farmers of New Zealand

Further Submission on Otago Regional Council's Proposed Plan Change 5A (Lindis: Integrated Water Management)

8 October 2015



0800 327 646 | FED FARM .ORG.NZ



FURTHER SUBMISSION TO OTAGO REGIONAL COUNCIL ON PROPOSED PLAN CHANGE 5A

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: policy@orc.govt.nz
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
kreilly@fedfarm.org.nz
Phone: 021 887 537

Address for service: as above

This is a further submission in response to submission/s made on Proposed Plan Change 5A
(Lindis Integrated Water Management)

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
Hearing Panel.

Federated Farmers wishes to be heard in support of this 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.

Where a submitter has sought the same relief as Federated Farmers, we support the relief sought by those submitters..

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
Otago Natural History Trust	2	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Seeks a 1000l/s or higher natural flow. The proposed changes need to ensure that the natural right of all New Zealanders to be able to swim in clean, fresh rivers in summer is restored.	Oppose	The Lindis river currently holds high recreational values and has no water quality issues – so it is inaccurate to imply that it is not a clean, fresh river.
Otago Anglers' Association And Fish and Game Council	9 54	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Set a summer minimum flow of at least 1,500 l/s, as measured at the Ardgoor Road flow recorder. In addition: a range of 1,000 l/s; 1,200 l/s; 1,200 l/s minimum flows and higher is sought from a number of out of town anglers on the basis that the Lindis river is a very important spawning tributary of Lake Dunstan, and that this needs to be enhanced, not compromised. Issues have been raised by both Fish & Game and its individual anglers about needing to grow the trout fisheries – that if there is insufficient flow, the trout fingerlings (as well as adult trout) are too easily eaten by predators and cannot return to the Clutha/Mata-Au.	Oppose	Submissions have been raised by both these fishing organisations and individual anglers from across New Zealand (many including pro-forma comments) that are inconsistent with the RMA, NPSFM and Otago RPS, particularly where it is suggested that Council should 'increase trout values' in this catchment at the expense of social and economic values – in particular the community, district, economy and farming. Trout fishing (an exotic species) has no higher value status than farming, irrigation or the economy under any national or regional regulation or law. Building up exotic predatory fish numbers has a known adverse impact on other indigenous freshwater species. This is a community/catchment process and we note that the vast majority of submitters seeking these higher flows are from elsewhere in New Zealand.

Submitter name	Sub No.	Section of Plan	Summary of relevant part of Submission	Support/ Oppose	Reason for submission
Environmental Defence Society Incorporated	50	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Seeks a minimum flow of 1,000 l/s. Submitter opposes the proposed minimum flow as it: a) does not adequately provide for/have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS and Otago's Conservation Management Strategy. • Suggested amendment promotes the sustainable management of the natural and physical resources in the region, to comply with the RMA and give effect to the NPSFM and the relevant regional policy documents.	Oppose	This Auckland-based submitter is new to this Lindis catchment process and hasn't been through the years of community workshops on these matters in which they could have heard the history of Council information, science and reports and community discussion and feedback. It was through these workshops that the 450 l/s was shown to be appropriate. We disagree that the NPSFM, RPS, RMA requires elevation beyond what science has shown to be reasonable and appropriate, particularly when at the expense of social and economic considerations.
Royal Forest and Bird Protection Society of New Zealand Inc.	65	Schedule 2A - 1 Oct to 31 May minimum flow for primary allocation	Seeks a minimum flow of 1,000 l/s as consider the proposed minimum flow: a) does not adequately provide for/ have regard to the purpose and principles of the RMA, b) does not give effect to the NPSFM, RPS and the Objectives and Policies of the RPW, c) is inconsistent with the PRPS and Otago's Conservation Management Strategy. • The Section 32 Evaluation Report does not adequately examine the appropriateness of the minimum flow for achieving the objectives, or alternatives for achieving the objectives, nor does it appropriately recognise the importance of environmental protection and an adequate minimum flow as a core element of sustainable management.	Oppose	This submitter is new to this Lindis catchment process and hasn't been through the years of community workshops on these matters in which they could have heard the history of Council information, science and reports and community discussion and feedback. It was through these workshops that the 450 l/s was shown to be appropriate. We disagree that the NPSFM, RPS, RMA requires elevation beyond what science has shown to be reasonable and appropriate, particularly when at the expense of social and economic considerations
Environmental Defence Society Incorporated	50	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Amend the winter minimum flow season from 1 June to 30 September to 1 May to 30 September	Oppose	This Auckland-based submitter has provided absolutely no basis for indicating why they believe a change in months in this manner is necessary, appropriate or justified in this catchment. They have simply 'opposed' it. We consider there is no science to show that the change to winter minimum flow months is necessary, appropriate or reasonable.
Fish & Game Council	54	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Amend the winter minimum flow season from 1 June to 30 September to 1 May to 30 September	Oppose	There has been no adequate scientific basis to show why this change in dates is required. Submitter is relying on a desire to increase trout fishery stocks – this is neither reasonable nor appropriate and is inconsistent with the RMA, NPSFM and PRPS.

Submitter name	Sub No.	Section of Plan	Summary of relevant part of Submission	Support/ Oppose	Reason for submission
Royal Forest and Bird Protection Society of New Zealand Inc.	65	Schedule 2A - 1 June to 30 Sept minimum flow for primary allocation	Amend the winter minimum flow season from 1 June to 30 September to 1 May to 30 September	Oppose	The submitter has provided absolutely no basis for indicating why they believe a change in months in this manner is necessary, appropriate or justified. They have simply 'opposed' it. We consider there is no science to show that the change to winter minimum flow months is necessary, appropriate or reasonable.
Contact Energy Ltd	76	Schedule 2B - Supplementary allocation regime	For clarity, amend Schedule 2B as follows: 1 May to 30 November 1 December to 30 April 1 May to 30 November 1 December to 30 April	Support	Provides plan users with more certainty and clarity than generic months.
Lindis Catchment Group	56	Rule 12.1.4 and mapping of the Lindis Catchment	Redefine the catchment area and amend Maps B4 and B7 to include all of the true geographic area of the Lindis Catchment and retain the proposed changes to this rule.	Support	The mapped catchment boundary doesn't recognise the true geographical catchment boundary and is in fact quite arbitrary and not ground-truthed. Basing future decisions on catchment allocation should not be determined in such a way. It results in significant adverse economic impacts and uncertainty/stress for those outside mapped areas as to where their water supply will come from.



**FURTHER SUBMISSION BY CONTACT ENERGY LIMITED
IN SUPPORT OR OPPOSITION TO SUBMISSIONS ON
PROPOSED PLAN CHANGE 5A (LINDIS: INTEGRATED WATER
MANAGEMENT)**

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**) submitted on the Proposed Plan Change 5A (Lindis: Integrated Water Management).

Contact wishes to make further submissions in support or opposition to submissions on the Proposed Plan Change 5A.

Contact has an interest in Proposed Plan Change 5A that is greater than the interest of the general public.

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.

A handwritten signature in cursive script that reads "Daniel Druce".

Daniel Druce
Environmental Advisor
Contact Energy Limited

**PROPOSED PLAN CHANGE 5A (LINDIS: INTEGRATED WATER MANAGEMENT)
 FURTHER SUBMISSION BY CONTACT ENERGY LIMITED
 BY PROVISION**

Name of Submitter	Submitter Number	Section of Proposed Plan Change	Relief Sought	Support or Oppose	Reasons
Otago Anglers Association	9	6. Schedule 2A – 1 Oct to 31 May minimum flow for primary allocation	Set a minimum flow of at least 1,500l/s	Oppose	Fails to adequately provide for the sustainable management of the natural and physical resources in the Lindis Catchment.
Clutha Sports Fisheries Trust	36	6. Schedule 2A – 1 Oct to 31 May minimum flow for primary allocation	Amend the summer minimum flow season to 1 October to 30 April.	Support in part	While the amended summer flow season as sought in this submission is slightly different from that proposed by Contact, the principle of a shortened summer flow season is supported.
Environmental Defence Society Incorporated	50	6. Schedule 2A – 1 Oct to 31 May minimum flow for primary allocation	Amend the summer minimum flow season to 1 October to 30 April.	Support in part	While the amended summer flow season as sought in this submission is slightly different from that proposed by Contact, the principle of a shortened summer flow season is supported.
Fish and Game Council	54	6. Schedule 2A – 1 Oct to 31 May minimum flow for primary allocation	Amend the summer minimum flow season to 1 October to 30 April.	Support in part	While the amended summer flow season as sought in this submission is slightly different from that proposed by Contact, the principle of a shortened summer flow season is supported.
Federated Farmers of New Zealand	57	6. Schedule 2A – 1 Oct to 31 May minimum flow for primary allocation	Adopt a primary allocation flow of 450l/s October to May and 1,600l/s June to September.	Oppose	Fails to adequately provide for the sustainable management of the natural and physical resources in the Lindis Catchment.

Name of Submitter	Submitter Number	Section of Proposed Plan Change	Relief Sought	Support or Oppose	Reasons
Fish and Game Council	54	7. Schedule 2A – 1 June to 30 September	Amend the winter minimum flow season to 1 May to 30 September.	Support in part	While the amended winter flow season as sought in this submission is slightly different from that proposed by Contact, the principle of a lengthened winter flow season is supported.
Royal Forest and Bird Protection Society of New Zealand	65	7. Schedule 2A – 1 June to 30 September	Amend the winter minimum flow season to 1 May to 30 September.	Support in part	While the amended winter flow season as sought in this submission is slightly different from that proposed by Contact, the principle of a lengthened winter flow season is supported.
Malvern Downs	47	38. Schedule 4B.2 – Restrictions on groundwater takes.	Delete reference to the Bendigo and Lower Tarras Aquifers from Schedule 4B.2	Oppose	When maximising the efficient use of water it is appropriate to place restrictions during the winter months when water is of maximum value for hydro-electric generation.
Fish and Game Council	54	38. Schedule 4B.2 – Restrictions on groundwater takes.	Oppose restriction on takes from the Bendigo and Lower Tarras Aquifers.	Oppose	When maximising the efficient use of water it is appropriate to place restrictions during the winter months when water is of maximum value for hydro-electric generation.
Lindis Catchment Group Inc.	56	38. Schedule 4B.2 – Restrictions on groundwater takes.	Remove/delete restriction on takes from the Lower Tarras and Bendigo Aquifers.	Oppose	When maximising the efficient use of water it is appropriate to place restrictions during the winter months when water is of maximum value for hydro-electric generation.

Name of Submitter	Submitter Number	Section of Proposed Plan Change	Relief Sought	Support or Oppose	Reasons
Federated Farmers of New Zealand	57	38. Schedule 4B.2 – Restrictions on groundwater takes.	Delete restriction on takes from the Bendigo and Lower Tarras Aquifers.	Oppose	When maximising the efficient use of water it is appropriate to place restrictions during the winter months when water is of maximum value for hydro-electric generation.

106

OTAGO REGIONAL COUNCIL
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FURTHER SUBMISSION FORM (Print clearly on both sides)

Proposed Plan Change 5A (Lindis: Integrated water management)
to the Regional Plan: Water for Otago

(Form 6, Clause 8 of the First Schedule, Resource Management Act 1991)

Office of

Name of further submitter: J. Murray Neilson

Organisation (if applicable):
n/a

Postal address: 22 Berwick Road
Woodside
RD 1 Outram

Postcode: 9073

Telephone: 03 486 1378

Email: kmsandica@extra.co.nz

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

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

Tick as appropriate:

I represent a relevant aspect of the public interest.

I have an interest in the proposal greater than the interest that the general public has.

Signature: J. Murray Neilson Date: 9/10/15
(of further submitter, or person authorised to sign on their behalf).

Important note to submitter:

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**SUBMISSIONS MUST BE RECEIVED BY 5.00 PM,
FRIDAY 9 OCTOBER 2015**



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

Please

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Royal Forest and Bird Protection Society of New Zealand Inc.	support submitter # 65, ref #s 6, 7, 8, 26 + 35	<p>The minimum flow proposed by the ORC during the summer is too low and needs to be increased to 1000 L/s from 1 October to 30 April consequent amendment needs to be made to the non-irrigation season minimum flow of 1600 L/s applying from 1 June to 30 September. This is necessary to achieve better protection of the environmental, natural character, recreational and amenity values of the Heretape River and to ensure year-round connectivity with the Clutha River - thus achieving the objectives of the NPSFM.</p>



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to the Regional Plan: Water for Otago**

(Form 6, Clause 8 of the First Schedule, Resource Management Act 1991)

Office use only:

Name of further submitter: J. Murray Neilsen

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to the Regional Plan: Water for Otago**

(Form 6, Clause 8 of the First Schedule, Resource Management Act 1991)

Office use or

Name of further submitter: *J. Murray Neilson*

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Wayne and Billee Marsh	support submitter # 78 ref # 6 - in part.	<p>It is pleasing to note that there at least 2 locals who recognise that an increase in minimum flow over and above the 750L/s proposed by ORC is necessary to achieve the protection of the ecosystem downstream of the SH's bridge necessary and to achieve connectivity to the Clutha River - This would achieve the objectives of the NPSTFM and the Tararua Community Plan 2007 and is in stark contrast to the other locals requesting a return to a min. flow of 450L/s which is manifestly inadequate</p>



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Signature: [Signature] Date: 9/10/15

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Collectively Kai Toenu	support submitter # 77 ref #'s 1 and 6	<p>PPC5A would better protect the environmental, natural character, recreation, amenity and cultural values of the Herdis River than the current situation. An amended summer minimum flow of 1000 L/s applying from 1 October to 30 April would better achieve protection of these values than the 750 L/s proposed by ORC, would ensure connectivity of the Herdis to the Clutha River, thus providing a migratory pathway for native fish as well as habitat and would achieve freshwater objectives B1, B2 and B3 of the NPSFM.</p>



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Signature: J. Murray Neilson Date: 9/10/15

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Clutha Fisheries Trust	support submitter # 36 ref #'s 1, 6 in entirety.	PPCSA better protects environmental, natural character and recreational values of the headis river than the existing situation. An amended summer minimum flow from 1 October to 30 April would better achieve the protection of these values than the 750 L/S proposed by ORC, would ensure connectivity of the headis river to the Clutha river and would achieve freshwater objectives B1, B2 and B3 of the NPSFM.



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Signature: J. Murray Neilson Date: 9/10/15
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Fish and Game Council	Support submitter # 54 ref #'s 5, 6, 7, 8, 16, 33, 35, 36, 37 38 in entirety	Fish and Game Council's Submission would better protect environmental, natural character and recreational values of the Healds River than the current situation, and the summer minimum flow proposed by Fish and Game would of 1000 L/s, applying from 1 October to 30 April, would better achieve these than the 750 L/s minimum flow proposed by ORC. It would also achieve freshwater objectives B1, B2 and B3 of the NPSFM.



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Signature: [Handwritten Signature] Date: 9/10/15

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Ian Cole	Support submitter # 24 ref 1	Better protection for environmental values and natural character of the Heidis River than current situation
	Support submitter # 24 ref # 6	Amended summer minimum flow of 1000 L/s, rather than proposed 750 L/s, better protects environment natural character, and recreational values, provides assured connection to the Clutha River, if amended to apply from 1 October to 30 April, and achieves freshwater objectives B1, B2 and B3 of the NPSFM.