

Grouped by Submitter
(matters beyond the scope of the plan change)

1 Alan Grant Macgregor

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Please be sensible with your decisions. Please do your best - it is the responsibility of us all.	Irrigators (especially dairy farmers) do not care (about water flows, ecosystems and the natural environment). Not much clean water left in North Otago and the Kakanui is a disgrace. Many appear sterilised.

3 L Turvey

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Temporary excesses of water from atmospheric precipitation desirably to be captured in part in tanks or other devices, especially domestic.	No reason given.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Research (further?) xerophytic alternative flora/fauna possibilities for smaller/larger areas - this even antagonistic to irrigation (evaporation and salination).	No reason given.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	No goats in any large numbers (mulch only?).	No reason given.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Present or future cause(s) of pollution removed or prevented, beyond boiled water and/or filtered drinking or washing standard (taste also critical).	No reason given.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Preserve pastoral and agricultural land use of present unless better is clear - any housing/tourist development to be restricted as to space and effects, especially water-wise (bring their own).	No reason given.

4 Lesley Warwood

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Get water from the ocean, generate power - distill water etc.	Spend money now and you have it for the rest of our lives. Three to four (power/distillation plants) around NZ and you have got it made - we would have it for ever. Use water that's all around us.

5 Clyde Watson

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Rivers cleaned with no pollution, and water with no chemicals. I would like water clean when we're cooking and washing etc.	No reason given.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	I would like to see that we have plenty of water to last us, and not waste water at all.	No reason given.

6 Alan Mark

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That a new objective be introduced into the Water Plan: <u>"To ensure the important water supply catchments in Otago have adequate protection of vegetation cover to optimise the quantity, quality and sustained low flows of the water they produce."</u>	Considerable research has shown type of vegetation cover has a major effect on aspects of water yield, including groundwater (see submission for attached information). Indigenous tall tussock grassland, rather than other vegetation cover (particularly exotic conifers), is better for maintaining water yield (both maximum and low flow yields). Outside of conservation land this needs adequate recognition through policy statements and plans.

21 Otago Fish and Game Council

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	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.	Section 6.1 (Introduction), paragraph 5, acknowledges the link between quantity and quality, and the lack of ability to assimilate contaminants under reduced flows. While water quality issues will be dealt with at a later date, "dilution is not the solution". It is a huge issue facing Otago and needs addressing on as many fronts as necessary. It is a hard issue with no easy answer.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Request the sentence "the provisions for the regulation of takes, in terms of minimum flow and allocation limits, are considered to be generally conservative of aquatic life and natural character" to be removed from the Introduction [section 6.1].	Flows set are generally not conservative of aquatic life. Small streams are being left with flows that only maintain linkage between pools and over summer high water temperatures can mean fish species are unable to survive. This is not consistent with Part 2 of the RMA, Section 5(g) (life-supporting capacity) and 7(h) (habitat of trout and salmon).
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	The amended 12.1.2.4 and 12.1.2.5 could have the identified wetland conditions amended to read: <u>"The water is not taken from any wetland identified in Schedule 9, or any wetland higher than 800 metres above sea level, or any wetland greater than 1000m² in area."</u>	Fish and Game consider all wetlands over 1000m ² in area need protection and should be included into the conditions for these permitted activity rules to take surface water.

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	The amended 12.1.2.6 could have the wetland conditions (a) amended to read: "The water is not taken from, nor is there any alteration of the water level of, any wetland identified in Schedule 9, or any wetland higher than 800 metres above sea level, <u>or any wetland greater than 1000m² in area</u> ", and/or (b) to read: "The taking does not result in the lowering of the level of water in any lake, river <u>or wetland</u> ; and".	Fish and Game suggest that all wetlands over 1000m ² in area need protection and should be included in the conditions for this permitted activity rule to take surface water.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Believe the Council should eliminate all mining rights that have not been exercised.	Method 15.8.1.1 outlines ORC will consider eliminating mining privilege takes which are not currently being exercised. The consideration of keeping a mining right water allocation that has not been used does nothing to help over-allocated catchments. The economic value of this water would not change by elimination and therefore the owner of the mining right would not have lost anything tangible.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Objective 6.3.1 could read: "To retain <u>and reinstate</u> flows in rivers sufficient to maintain their life-supporting capacity for aquatic ecosystems, and their natural character."	Fish and Game support the objective but suggest "reinstated" be added as some water bodies do not have enough water to retain any form of aquatic life.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	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.	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. This could lead to flat-lining of stream flows to the extent that instream values are adversely impacted upon. Care needs to be taken when allowing all flows above mean flow to be extracted.

27 Waitaki District Council (Water and Wastewater)

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That the following corrections be made to the Waitaki District Council takes identified in Schedule 1B - Reference to "Palmerston Water Supply" is changed to "Palmerston <u>(including Blue Mountain)</u> Water Supply".	The current reference is incorrect.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That rules relating to transfers of water permits be included in Section 12 of the Regional Plan: Water for Otago.	Policy 6.4.0B would be made more effective if it were complemented by appropriate rules.

28 Mount Cardrona Station Limited

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Amend Schedule 1B to include Mt Cardrona Station Community water supply scheme permitted under consent 97216 and most recently varied under consent RC 2006.375 to support change Council has proposed to 12.1.3.1.	It is important that Schedule 1B communities have certainty of supply. The Mt Cardrona community supply is consented to supply approximately 2700 persons in the newly created Mt Cardrona Station Zone under the QLDC district plan.

29 Locharburn Grazing Company

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	The rulings be simple easily understood and sustainable.	The explanation to Policy 6.4.16 makes sense, but it is vastly different to the current policy ORC are implementing. Metering can be expensive and impractical. Measurement should be relevant and simple, rather than taken at a race head on a daily basis.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	The rulings be simple easily understood and sustainable.	With regard to Section 16.3.1, appreciate that some record of water taken is required, but the method to do so should be sustainable. Currently the cost of metering is often greater than the return for the water taken, particularly where the quantity of water taken is very small. If a user has water allocated and is paying for it the way they use it, it should be up to the user, not be dictated by ORC.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That the cost structure for consents be reviewed and streamlined.	Currently it is complex and costly.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	When a water right has been with a property for a long period of time it will have a value to that property and favourable consideration should be given to its retention.	No reason given.

30 Kakanui Riverwatch Society Inc

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	This information [relating to Schedule 4A entry for North Otago Volcanic Aquifer] should have been provided in the proposed Plan Change.	The Draft North Otago Volcanic Aquifer Study suggests an allocation volume of 7 Mm3/year, but this is not shown in Schedule 4A. The omission of vital information and intentions is disenfranchising for full disclosure and transparency.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Implement the comment regarding Policy 6.4.9 [that supplementary allocations should only be assessed under 6.4.9(a) and not under 6.4.9(b)].	Policy 6.4.9 (b) is unnecessary and allows for backroom deals to be done.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Implement the comment [Consideration should be given to charging a fee for any water used to make money].	Water is going to become scarcer and more valuable. Water is a publicly-owned resource and is free to consent holders.

31 Otago Conservation Board

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	No decision requested.	Does not support the view that all rivers of a region should be allocated to commercial abstractive users. Supports a position where a particular river in a geographical region should be left in its natural state, both for the benefit of public use and as a control system for further long-term river study in that particular reason.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	No decision requested.	The proof of impact of any abstraction should always be by the abstractor and not the public at large rather than the other way around, commonly known as socialising the costs and privatising the gains.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Rivers should be managed by way of a maximum allocation for abstraction, as well as a minimum flow, because of the potential to "flat line" rivers when using a minimum flow only.	No reason given.

35 Dunedin City Council (Water and Waste Services)

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That the following community water supply takes be added to Schedule 3B: Dunedin City Council Mosgiel water supply bores at: NZMS260 I44:048-789, NZMS260 I44:042-779, NZMS260 I44:036-776, NZMS260 I44:048-789, NZMS260 I44:036-788, NZMS260 I44:051-787, NZMS260 I44:032-782, NZMS260 I44:051-789, NZMS260 I44:042-784.	The existing Schedule 3B does not include these nine bores.

37 Dugald MacTavish

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	No decision requested.	Concerned that the general thrust of these changes could result in an erosion of the public's capacity, through the ORC and RMA processes, to manage the resource in the interests of instream values and sustainability generally. Will give details of these concerns and provide possible alternatives at the hearing.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	No decision requested.	Concerned that reviewing only parts of the plan rather than the entire plan may introduce undesirable inconsistencies that may only become apparent with time. Will give details of these concerns and provide possible alternatives at the hearing.

38 Pioneer Generation Ltd

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>Add an acknowledgement as a last sentence to the Explanation [to Policy 6.6.0] as follows:</p> <p><u>"Pioneer Generation Limited is an affected party for all applications for takes from Fraser River, the Roaring Meg Creek, Teviot River, Wye Creek, Oxburn Stream and Manuherikia Rivers and the Kawarau and Shotover Rivers".</u></p>	Supports the development of shared water infrastructure.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>Retain the reference to hydro-electric power generation in the first sentence of the Introduction [Section 6.1].</p> <p>Add to the second to last sentence of the third paragraph of the introduction [Section 6.1, to read] as follows or to like effect:</p> <p><u>"...will recognise current access to water, but will also consider the intended purpose of use for the water, and protection of aquatic ecosystems, natural character of the affected water bodies and protection of water for existing hydro-electric generation and potential development of further hydro-electric generation in the region."</u></p> <p>Amend the first sentence of the sixth paragraph [of Section 6.1] as follows or to like effect:</p> <p><u>"The water allocation provisions of this chapter are intended to provide for the maintenance of water availability for existing hydro-electric generation and maintenance of aquatic ecosystem and natural character values of water bodies..."</u></p>	Given the importance of water in use for hydro-electric power generation, seeks to have it recognised.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>Suggests the addition of the following Issues:</p> <p><u>"The inefficient allocation and use of water within the Region can significantly reduce the benefits to be derived from the use of the resource, including its use for the generation of renewable energy."</u></p> <p><u>"The cumulative effects of the taking of water may:</u></p> <ul style="list-style-type: none"> i) <u>result in reductions of water quality and aquatic habitat</u> ii) <u>limit the availability of water for other actual and potential uses</u> iii) <u>compromise the generation of renewable energy."</u> 	No issue in the Water Plan that currently recognises the impact of consumptive uses on non-consumptive uses, as is necessary to be consistent with the Regional Policy Statement (RPS). ORC must also give effect to the RPS under the RMA, so the plan change should recognise and provide for hydro-electric generation, as do some other district plans.

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>Seeks the inclusion of two new Objectives as follows:</p> <p><u>"The continued availability of water currently (at the date of notification of this change) used for renewable energy generation."</u></p> <p><u>"Enable people and communities to provide for their social, economic and cultural wellbeing by providing water for hydro-electricity generation."</u></p> <p>Seeks that the Explanation for these Objectives be provided as follows:</p> <p><u>"Section 7(j) of the RMA provides for the generation of renewable energy as a matter of national importance. This legislative requirement is acknowledged in Objectives [relevant numbers]."</u></p>	<p>There is no objective in the Water Plan that ensures water is available for renewable energy generation, and consideration is provided for under the RMA, so the plan change should recognise and provide for these matters. A Water Plan objective should manage water takes to avoid adverse cumulative effects on renewable generation.</p>
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>Seeks the addition of a policy as follows or to like effect:</p> <p><u>"The benefits to be derived from the use of water for the generation of renewable energy" when establishing allocation.</u></p>	<p>To carry through from requested new issues and objectives, a policy is needed to identify the benefits of hydro-electric generation.</p>

39 Public Health South

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That there should be further controls over land use in the area of drinking water supply catchments (community drinking water supplies).	There are current national policies on the abstraction of drinking water and discharge consents upstream or upgradient of these supplies. While it is largely a Territorial Authority issue, management of land-based activities and land use should be included in the issues section concerning quality and quantity of surface and groundwater. This will ensure the consent process considers these activities where source water quality may be impacted.

40 Criffel Irrigation Scheme

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That the current water rights that have constantly been used over the last 20 years and longer, along with their structures and races, are fully respected with no restriction being placed on those rights.	Luggate Creek has had a successful balance between all groups as demonstrated at the community meetings and workshops, and meets relevant environmental standards important in this area.

42 Federated Farmers of New Zealand (Inc)

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	[Method 15.8.1.[1]] Calculation must be consistent with NES Environmental Flows and Methods methodology.	To be consistent with NES.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	[With regard to Policy 6.4.16] Any requirement to measure must be efficient, cost effective, relative and appropriate to the effect on other users and the water resource. Amend wording to include bullet points to this effect in the policy. Oppose measuring requirements on all permitted takes.	Policy must be consistent with NES, and requirement to measure must be assessed against the possible impact of not measuring. Measuring devices must be appropriate to the user, and relative to the amount of water taken, and its potential impact on the resource and other users.

43 Maheno Farms Limited

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Objective [Issue] 6.2.4A should be clear that some effect on neighbouring bores such as a minor lowering in water levels is acceptable - but no activity should prevent a neighbouring bore from accessing water in its entirety.	Needs to recognise and accept that any taking of groundwater may cause some level of reduction in levels or pressure in the groundwater resource, and that this is acceptable in the context of the RMA. The key consideration is instead whether it prevents another party getting access to the resource in some form. Submission quotes some case law.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	If Policy 6.4.10B is moved, it needs to be made clear that some effect may occur and that not necessarily all effects are adverse.	No reason given, but see submission on Issue 6.2.4A and Objective 6.3.2A.

44 Horticulture New Zealand

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Amend Policy 6.4.10B as follows: "In managing the taking of groundwater, to have regard to avoiding adverse effects on existing groundwater <u>takes where the existing bore is adequately penetrating the aquifer and is adequately maintained.</u> "	It is inappropriate that a bore owner's written approval be required, if the functionality of the bore is inadequate. Affected party approval should be addressed at the point of consent application, and not be a mandatory plan requirement.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Amend Policy 6.4.17 to provide for transfers as a restricted discretionary activity.	Reliance on Section 136(2)(b)(ii) of the RMA means transfers are discretionary by default. If the transfer meets the requirements of the policy, then restricted discretionary activity status should be adequate.

46 Pisa Irrigation Company

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	The rulings be simple easily understood and sustainable.	The explanation to Policy 6.4.16 makes sense, but it is vastly different to the current policy ORC are implementing. Metering can be expensive and impractical. Measurement should be relevant and simple, rather than taken at a race head on a daily basis.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	The rulings be simple easily understood and sustainable.	With regard to Section 16.3.1, appreciate that some record of water taken is required, but the method to do so should be sustainable. Currently the cost of metering is often greater than the return for the water taken, particularly where the quantity of water taken is very small. If a user has water allocated and is paying for it the way they use it, it should be up to the user, not be dictated by ORC.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That the cost structure for consents be reviewed and streamlined.	Currently it is complex and costly.

48 The Director-General of Conservation

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That the following amendment be made to the first paragraph [of Section 6.1, Introduction]: "Water is an important resource to many of Otago's people and communities due to its use for domestic and community water supply, stock drinking water, irrigation, hydro-electric power generation, <u>its value for recreational and ecological uses, and industrial supply.</u> ...".	The current uses and importance of water doesn't reflect other major uses of water.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That the following amendment be made to the fourth paragraph [of Section 6.1, Introduction]: "... This is achieved through the regulation of the taking, damming or diversion of water <u>and by managing the impact of land use activities on water quantity.</u> ... This chapter applies in detail the direction given by the Regional Policy Statement for Otago (<u>in particular Objective 5.4.2 and Policy 5.5.5</u>) to the management of activities affecting water quantity."	The potential impact of land use activities on the sustainable management of water and the direction given in the RPS are clearly specified.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That the following amendment be made to the sixth paragraph [of Section 6.1, Introduction]: "The water allocation provisions of this chapter are intended to provide for the maintenance <u>and enhancement</u> of aquatic ecosystem and natural character values of water bodies."	To give effect to Objective 6.4.4 of the RPS.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	The inclusion of the following "Anticipated Environmental Result" [in Section 6.7]: " <u>6.7.9 The potential impact of some land use activities on water yield is recognised and managed.</u> "	To give effect to proposed amendments regarding potential effects of land use activities on water yield .
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	The following amendment be made [to Section 9.1, Introduction, in the Groundwater Chapter]: "...These uses include domestic and public water supply, stock drinking water, irrigation, <u>recreational, ecological, and industrial uses...</u> ".	To better reflect the uses of groundwater.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That the Director-General of Conservation always be treated by the Otago Regional Council, be treated as an affected party for applications to take and use water, unless by prior agreement to the contrary.	In relation to Rules 12.1.3, 12.1.4.1 and all other rules for activities that aren't permitted activities, that given the statutory roles of the Director General pursuant to the Conservation Act 1987 and the Freshwater Fisheries Regulations 1983, they be treated as an affected party.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	That the following amendment is made to Rule 12.1.4[.1]: "...and <u>(g) Any need to avoid, remedy or mitigate any adverse effect on significant indigenous flora and/or habitats of significant fauna.</u> "	So consideration is given to these matters when assessing such applications.

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137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>The following amendment to Method 15.3.1:</p> <p><u>"...and (e) The influence of land use activities on both water quality and water yield"</u>, and</p> <p>to [the end of the last paragraph in] Principal reasons for adopting:</p> <p><u>"It will also make users aware of the influence of land use activities on both water quality and water yield"</u>.</p>	So that influence of land use activities on effective water utilisation is better publicised.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>The inclusion of the following Method:</p> <p><u>"15.10 Future Policy Development</u></p> <p><u>The Otago Regional Council shall, within either its 2009/2010 or 2010/2011 Annual Plan, commit to developing effective policy instruments for the purpose of controlling the use of land for the purpose of:</u></p> <p><u>(i) Soil conservation;</u></p> <p><u>(ii) The maintenance and enhancement of the quality of water in water bodies;</u></p> <p><u>(iii) The maintenance of the quantity of water in water bodies;</u></p> <p><u>(iiia)The maintenance and enhancement of ecosystems in water bodies;</u></p> <p><u>(iv) The avoidance or mitigation of natural hazards"</u>.</p>	So that the ORC better meets its Resource Management Act Section 30 functions.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>That the following definitions be added to the Glossary:</p> <p><u>"Reasonable needs of an individual's animals for drinking water (refer Farm Technical Manual; Lincoln University, 1991)</u></p> <p><u>[Animal]; Litres/head/day</u></p> <p><u>Dairy cattle - in lactation; 70</u></p> <p><u>Dairy cattle - dry; 45</u></p> <p><u>Beef cattle; 45</u></p> <p><u>Calves; 25</u></p> <p><u>Horses - working; 55</u></p> <p><u>Horses - grazing; 35</u></p> <p><u>Breeding ewes; 3</u></p> <p><u>Sows; 25</u></p> <p><u>Pigs; 11</u></p> <p><u>Poultry - per 100 birds per day; 30</u></p> <p><u>Turkeys - per 100 birds per day; 55"</u></p>	So that "the reasonable needs of an individual's animals for drinking water and/or stock drinking use" are better defined, thereby enabling the "quantity of water required for the intended purpose of use" (Rules 12.1.4.8 and 12.2.3.4) to be more accurately determined.

50 Central Otago District Council

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Include frost-fighting as a recognised use of water in the Introduction [Section 6.1] and where appropriate in the body of the document.	First paragraph of Section 6 lists water applications but omits frost-fighting.

51 TrustPower Limited

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>Insert the following text under Policy 6.4.17:</p> <p><u>"(e) The written approval of existing consent holders shall be required where the transfer is upstream of those consent holders."</u></p> <p>Any similar amendments to like effect.</p> <p>Any consequential amendments that stem from the amendment of Policy 6.4.17.</p>	This Policy could lead to a situation where a take could be transferred upstream of an existing hydroelectric power schemes thereby reducing the amount of water available to satisfy the consents held for that scheme.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>Insert the following text under 6.1 Introduction:</p> <p><u>"Hydroelectric power schemes play a vital role in the regions social and economic wellbeing and the importance of renewable electricity generation under Part 2 of the Resource Management Act is recognised in the Regional Plan: Water for Otago"</u>.</p> <p>Any similar amendments to like effect.</p> <p>Any consequential amendments that stem from the amendment of section 6.1 Introduction as outlined in this submission, including amendments to other parts of the Regional Plan (for example issues, objectives, policies, rules or methods) which seek to give effect to this statement.</p>	Hydroelectric power schemes are important and strategic physical resources that warrant protection.
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>Within corresponding rules associated with Policy 6.4.1 all water takes (including those that are permitted or otherwise authorised by Section 14(3)(b) of the RMA) must be metered and recorded in order to maintain an accurate and complete record of all water abstractions.</p> <p>Any similar amendments to like effect.</p> <p>Any consequential amendments that stem from the amendment of Policy 6.4.1 as proposed in this submission.</p>	It is not clear how water taken and used for hydroelectric power schemes (HEPS) is to be managed and adequately taken account of and provided for in any defined allocation limit. Takes for HEPS need to be appropriately taken account of and provided for in defining allocation quantities and metering takes should be considered a tool in water take management.

52 Contact Energy Limited

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>The addition of Issues as follows:</p> <p><u>"The inefficient allocation and use of water within the Region can significantly reduce the benefits to be derived from the use of the resource, including its use for the generation of renewable energy."</u></p> <p><u>"The cumulative effects of the taking of water may:</u></p> <ul style="list-style-type: none"> i) <u>result in reductions of water quality and aquatic habitat</u> ii) <u>limit the availability of water for other actual and potential uses</u> iii) <u>compromise the generation of renewable energy."</u> 	<p>No issue in the Water Plan that currently recognises the impact of consumptive uses on non-consumptive uses, as is necessary to be consistent with the Regional Policy Statement (RPS). ORC must also give effect to the RPS under the RMA, so the plan change should recognise and provide for hydro-electric generation, as do some other district plans.</p>
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>The inclusion of two new Objectives as follows:</p> <p><u>"The continued availability of water currently (at the date of notification of this change) used for renewable energy generation."</u></p> <p><u>"Enable people and communities to provide for their social, economic and cultural wellbeing by providing water for hydro-electricity generation."</u></p> <p>An Explanation for these Objectives as follows: <u>"Section 7(j) of the RMA provides for the generation of renewable energy as a matter of national importance. This legislative requirement is acknowledged in Objectives [relevant numbers]."</u></p>	<p>There is no objective in the Water Plan that ensures water is available for renewable energy generation, and consideration is provided for under the RMA, so the plan change should recognise and provide for these matters. A Water Plan objective should manage water takes to avoid adverse cumulative effects on renewable generation.</p>
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>The addition of a new Policy as follows or to like effect:</p> <p><u>"The benefits to be derived from the use of water for the generation of renewable energy."</u> when establishing allocation.</p>	<p>To carry through from requested new issues and objectives, a policy is needed to identify the benefits of hydro-electric generation.</p>

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	<p>Retain the reference to hydro-electric generation in the opening sentence of the Introduction [Section 6.1].</p> <p>Add to the second to last sentence of the third paragraph of the introduction [Section 6.1] as follows or to like effect:</p> <p>"...will recognise current access to water, but will also consider the intended purpose of use for the water and protection of aquatic ecosystems, natural character of the affected water bodies <u>and protection of water for existing and potential hydro-generation of electricity.</u>"</p> <p>Amend the first sentence of the sixth paragraph [of Section 6.1] as follows or to like effect:</p> <p>"The water allocation provisions of this chapter are intended to provide for the maintenance of water <u>availability for existing hydro-electric generation and maintenance of</u> aquatic ecosystem and natural character values of water bodies. ..."</p>	Supports the positive mention of hydro-electric generation as it notes the importance that water has. The Introduction should incorporate protection of water for existing and potential hydro-generation as well as aquatic ecosystems and natural character.

54 Hokonui Runanga

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Supports the measurement of the volume and rate of water takes [Policy 6.4.16].	Metering of takes is consistent with objectives and policies of the Kai Tahu ki Otago Natural Resource Management Plan.

55 Te Runanga o Otakou

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Supports the measurement of the volume and rate of water takes [Policy 6.4.16].	Metering of takes is consistent with objectives and policies of the Kai Tahu ki Otago Natural Resource Management Plan.

56 Kati Huirapa Runanga ki Puketeraki

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Supports the measurement of the volume and rate of water takes [Policy 6.4.16].	Metering of takes is consistent with objectives and policies of the Kai Tahu ki Otago Natural Resource Management Plan.

57 Te Runanga o Moeraki

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Supports the measurement of the volume and rate of water takes [Policy 6.4.16].	Metering of takes is consistent with objectives and policies of the Kai Tahu ki Otago Natural Resource Management Plan.

58 Cromwell Branch Federated Farmers of New Zealand

REF.	MAIN ISSUE	ISSUE	POSITION	SUBMITTER DECISION REQUESTED	SUBMITTER REASON FOR DECISION REQUESTED / SUBMITTER COMMENTS
137	Matters Beyond the Scope of the Plan Change	Matters Beyond the Scope of the Plan Change	not applicable	Would like the Council to retain the same type of privileges as the mining priority has now, in the new RMA water consents.	To provide for the transition from mining privileges to RMA consents.