SUMMARY OF DECISIONS REQUESTED

Incorporating Further Submissions

on Proposed Plan Change 6AA

to the Regional Plan: Water for Otago



Preface

Proposed Plan Change 6AA to the Regional Plan: Water for Otago was publicly notified on 5 October 2019 in accordance with Clause 5 of the First Schedule of the Resource Management Act 1991 (RMA).

This document summarises the 20 submissions received. Nineteen of these submissions were lodged within the statutory time frame specified, by 5pm on 4 November 2019. The 20th submission was received late. Under delegated authority Otago Regional Council has waived the time limit for this submission.

Any associated further submission in support or opposition is included following its submission point. These are shown in italics. A total of three further submissions were received by the closing date of Friday 22 November 2019.

The eligibility of the further submission received from Fraser McRae will be discussed at the Plan Change hearing, with a focus on:

- Whether Fraser McRae represents a relevant aspect of the public interest and
- Whether the decision requested is allowable or whether it extends the scope of the original submission it relates to.

This report summarises all three further submissions.

The full original submissions and further submissions are available at Otago Regional Council offices and on www.orc.govt.nz

Index to Submitters - By Name

Surname, First Name <u>or</u> Organisation	Address for Service	Submitter Number
Aspinall, Randall	Box 94 Wanaka 9343 aspiringstation@gmail.com	18
Ballance Agri-Nutrients	Dominic Adams Private Bag 12-503 Tauranga 3143 dominic.adams@ballance.co.nz	11
Cleaver, Carl	carlcleaver@gmail.com	5
Dairy Holdings Limited	Ben Williams Chapman Tripp PO Box 2510 Christchurch 8053 ben.williams@chapmantripp.com	16
Dairy NZ	Charlotte Wright PO Box 85066 Lincoln University 7647 charlotte.wright@dairynz.co.nz	20
Dunedin City Council	Scott Campbell PO Box 5045 Dunedin 9054 scott.campbell@dcc.govt.nz	12
Federated Farmers	Darryl Sycamore PO Box 5242 Dunedin 9016 dsycamore@fedfarm.org.nz	6
George, Peter Andrew	36 Panmure Avenue Carlton Hill Dunedin 9012 pternz@gmail.com	4
Green, Joy	26 Stour St Oamaru 9400	1
Guardians of Lake Wanaka & Guardians of Lake Hawea	Don Robertson Department of Conservation Wanaka Office PO Box 93, Wanaka 9343 Wanaka 9305	8
	donandgaye@xtra.co.nz	_
Hollis, Mel	63 Stirling Crescent Mosgiel 9024 mel.hollis@xtra.co.nz	3
Horticulture New Zealand	Rachel McClung PO Box 10-232 Wellington 6143 Rachel.mcclung@hortnz.com	10

Surname, First Name <u>or</u> Organisation	Address for Service	Submitter Number
Mann, Sydney	25 Turnbull Street Brockville Dunedin 9011	7
Otago Fish and Game Council & Central South Island Fish and Game Council	Otago Fish and Game Council Nigel Paragreen PO Box 76 Dunedin 9016 nparagreen@fishandgame.org.nz and	17
	Central South Island Fish and Game Council Angela Christensen PO Box 150 Temuka 7948 achristensen@csifgc.org.nz	
Ravensdown Limited	Carmen Taylor Planz Consultants Limited PO Box 1845 Christchurch 8140 carmen@planzconsultants.co.nz	9
Royal Forest and Bird Protection Society NZ	Sue Maturin Box 6230 Dunedin 9059 s.maturin@forestandbird.org.nz	15
Schallenberg, Marc	58 Gladstone Road Dalmore Dunedin 9010 marc.schallenberg@otago.ac.nz	13
Waitaki Irrigators Collective Limited	Fraser McKenzie PO Box 159 Oamaru 9444 admin@waitakiirrigators.co.nz	14
Werner, Craig	30 Howard Street Macandrew Bay Dunedin 9014 craigwerner.ww@gmail.com	2
Wise Response Society	Sir Alan Mark 205 Wakari road Helensburgh Dunedin 9010 alan.mark@otago.ac.nz	19

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Submitter Number	Surname, First Name <u>or</u> Organisation	Address for Service
1	Green, Joy	26 Stour St Oamaru 9400
2	Werner, Craig	30 Howard Street Macandrew Bay Dunedin 9014 craigwerner.ww@gmail.com
3	Hollis, Mel	63 Stirling Crescent Mosgiel 9024 mel.hollis@xtra.co.nz
4	George, Peter Andrew	36 Panmure Avenue Carlton Hill Dunedin 9012 pternz@gmail.com
5	Cleaver, Carl	carlcleaver@gmail.com
6	Federated Farmers	Darryl Sycamore PO Box 5242 Dunedin 9016 dsycamore@fedfarm.org.nz
7	Mann, Sydney	25 Turnbull Street Brockville Dunedin 9011
8	Guardians of Lake Wanaka & Guardians of Lake Hawea	Don Robertson Department of Conservation Wanaka Office PO Box 93, Wanaka 9343 Wanaka 9305 donandgaye@xtra.co.nz
9	Ravensdown Limited	Carmen Taylor Planz Consultants Limited PO Box 1845 Christchurch 8140 carmen@planzconsultants.co.nz
10	Horticulture New Zealand	Rachel McClung PO Box 10-232 Wellington 6143 Rachel.mcclung@hortnz.com
11	Ballance Agri-Nutrients	Dominic Adams Private Bag 12-503 Tauranga 3143 dominic.adams@ballance.co.nz
12	Dunedin City Council	Scott Campbell PO Box 5045 Dunedin 9054 scott.campbell@dcc.govt.nz

Submitter Number	Surname, First Name <u>or</u> Organisation	Address for Service
13	Schallenberg, Marc	58 Gladstone Road Dalmore Dunedin 9010 marc.schallenberg@otago.ac.nz
14	Waitaki Irrigators Collective Limited	Fraser McKenzie PO Box 159 Oamaru 9444 admin@waitakiirrigators.co.nz
15	Royal Forest and Bird Protection Society NZ	Sue Maturin Box 6230 Dunedin 9059 s.maturin@forestandbird.org.nz
16	Dairy Holdings Limited	Ben Williams Chapman Tripp PO Box 2510 Christchurch 8053 ben.williams@chapmantripp.com
17	Otago Fish and Game Council & Central South Island Fish and Game Council	Otago Fish and Game Council Nigel Paragreen PO Box 76 Dunedin 9016 nparagreen@fishandgame.org.nz and
		Central South Island Fish and Game Council Angela Christensen PO Box 150 Temuka 7948 achristensen@csifgc.org.nz
18	Aspinall, Randall	Box 94 Wanaka 9343 aspiringstation@gmail.com
19	Wise Response Society	Sir Alan Mark 205 Wakari road Helensburgh Dunedin 9010 alan.mark@otago.ac.nz
20	Dairy NZ	Charlotte Wright PO Box 85066 Lincoln University 7647 charlotte.wright@dairynz.co.nz

Index to Further Submitters

Submitter Number	Surname, First Name or Organisation	Address for Service
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea	Don Robertson Department of Conservation Wanaka Office PO Box 93, Wanaka 9343 Wanaka 9305 donandgaye@xtra.co.nz
1002	Wise Response Society	Sir Alan Mark 205 Wakari road Helensburgh Dunedin 9010 alan.mark@otago.ac.nz
1003	Fraser McRae	fraser.mcrae35@gmail.com

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

Sub/Further Sub Number	Submitter Name/ Further Submitter Name	Submission Point	Issue	Provision	Position	Decision Requested
1	Joy Green	1.1	Overall	Whole Plan Change	Oppose	Leave the date at 1 April 2020 or alternatively amend it to 1 April 2023
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Support	
2	Craig Werner	2.1	Overall	Whole Plan Change	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Oppose	, i i
3	Mel Hollis	3.1	Overall	Whole Plan Change	Oppose	Withdraw Plan Change 6AA or alternatively amend it to 1 April 2021.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Support	
4	Peter Andrew George	4.1	Overall	Whole Plan Change	Oppose	Withdraw Plan Change 6AA.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Support	
5	Carl Cleaver	5.1	Time extension - Nitrogen Leaching	Overseer	Oppose	Withdraw proposed change to Rule 12.C.1.3.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Support	
6	Federated Farmers	6.1	Overall	Whole Plan Change	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake				Oppose	

Sub/Further Sub Number	Submitter Name/ Further Submitter Name	Submission Point	Issue	Provision	Position	Decision Requested
	Hawea					
7	Sydney Mann	7.1	Overall	Whole Plan Change	Oppose	Withdraw proposed Plan Change 6AA.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Support	
8	Guardians of Lake Wanaka & Guardians of Lake Hawea	8.1	Overall	Whole Plan Change	Amend	Bring the proposed date forward to 1 April 2022 or earlier, in particular for contaminant discharges in the Upper Lakes Rohe of the Clutha/Mata-Au Freshwater Management Unit.
9	Ravensdown Limited	9.1	Overall	Whole Plan Change	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Oppose	
10	Horticulture New Zealand	10.1	Overall	Whole Plan Change	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Oppose	
11	Ballance Agri- Nutrients	11.1	Overall	Whole Plan Change	Support	 Approve Plan Change 6AA as notified. Establish non-regulatory mechanisms to drive and support the development and completion of nutrient budgets and farm plans without delay.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Oppose	
12	Dunedin City Council	12.1	Overall	Whole Plan Change	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka &				Oppose	

Sub/Further Sub Number	Submitter Name/ Further Submitter Name	Submission Point	Issue	Provision	Position	Decision Requested
	Guardians of Lake Hawea					
13	Marc Schallenberg	13.1	Overall	Whole Plan Change	Oppose	Withdraw plan change 6AA and instead strengthen the Plan's policy framework as described in Option 1 of the S32 report.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Support	
1002	Wise Response Society				Support	
14	Waitaki Irrigators Collective Limited	14.1	Overall	Whole Plan Change	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Oppose	
15	Royal Forest and Bird Protection Society NZ	15.1	Overall	Whole Plan Change	Oppose	Retain existing 1 April 2020 compliance date.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Support	
1002	Wise Response Society				Support	
1003	Fraser McRae				Support	 Withdraw Plan Change 6AA Initiate a plan change to update the OVERSEER version in Rule 12.C.1.3 Seek Environment Court consent to change catchment/river to freshwater management units in Plan Change 6A's tables and schedules
16	Dairy Holdings Limited	16.1	Overall	Whole Plan Change	Support	Approve Plan Change 6AA as notified.

Sub/Further Sub Number	Submitter Name/ Further Submitter Name	Submission Point	Issue	Provision	Position	Decision Requested
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Oppose	
17	Otago Fish and Game Council & Central South Island Fish and Game Council	17.1	Overall	Whole Plan Change	Neutral	No amendment sought.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Oppose neutrality Support concerns expressed by the submitter	
18	Randall Aspinall	18.1	Overall	Whole Plan Change	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Oppose	
19	Wise Response Society	19.1	Overall	Whole Plan Change	Oppose	[Note: Decision requested beyond the scope of Plan Change 6AA]
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Support	
1003	Fraser McRae				Support	 Withdraw Plan Change 6AA Initiate a plan change to update the OVERSEER version in Rule 12.C.1.3 Seek Environment Court consent to change catchment/river to freshwater management units in Plan Change 6A's tables and schedules

Sub/Further Sub Number	Submitter Name/ Further Submitter Name	Submission Point	Issue	Provision	Position	Decision Requested
20	Dairy NZ	20.1	Overall	Whole Plan Change	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea				Oppose	

Grouped by Topic (matters within the scope of the plan change)

1 Whole Plan Change

Sub/Further Sub Number	Submitter Name/ Further Submitter Name	Submission Point	Position	Decision Requested
1	Joy Green	1.1	Oppose	Leave the date at 1 April 2020 or alternatively amend it to 1 April 2023
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Support	
2	Craig Werner	2.1	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Oppose	
3	Mel Hollis	3.1	Oppose	Withdraw Plan Change 6AA or alternatively amend it to 1 April 2021.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Support	
4	Peter Andrew George	4.1	Oppose	Withdraw Plan Change 6AA.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Support	
6	Federated Farmers	6.1	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Oppose	
7	Sydney Mann	7.1	Oppose	Withdraw proposed Plan Change 6AA.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Support	
8	Guardians of Lake Wanaka & Guardians of Lake Hawea	8.1	Amend	Bring the proposed date forward to 1 April 2022 or earlier, in particular for contaminant discharges in the Upper Lakes Rohe of the Clutha/Mata-Au Freshwater Management Unit.
9	Ravensdown Limited	9.1	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Oppose	
10	Horticulture New Zealand	10.1	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Oppose	
11	Ballance Agri-Nutrients	11.1	Support	 Approve Plan Change 6AA as notified. Establish non-regulatory mechanisms to drive and support the development and completion of nutrient budgets and farm plans without delay.

Sub/Further Sub Number	Submitter Name/ Further Submitter Name	Submission Point	Position	Decision Requested
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Oppose	
12	Dunedin City Council	12.1	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Oppose	
13	Marc Schallenberg	13.1	Oppose	Withdraw plan change 6AA and instead strengthen the Plan's policy framework as described in Option 1 of the S32 report.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Support	
1002	Wise Response Society		Support	
14	Waitaki Irrigators Collective Limited	14.1	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Oppose	
15	Royal Forest and Bird Protection Society NZ	15.1	Oppose	Retain existing 1 April 2020 compliance date.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Support	
1002	Wise Response Society		Support	
1003	Fraser McRae		Support	 Withdraw Plan Change 6AA Initiate a plan change to update the OVERSEER version in Rule 12.C.1.3 Seek Environment Court consent to change catchment/river to freshwater management units in Plan Change 6A's tables and schedules
16	Dairy Holdings Limited	16.1	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Oppose	

Sub/Further Sub	Submitter Name/	Submission Point	Position	Decision Requested
Number	Further Submitter Name			
17	Otago Fish and Game Council & Central South Island Fish and Game Council	17.1	Neutral	No amendment sought.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Oppose neutrality Support concerns expressed by the submitter	
18	Randall Aspinall	18.1	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Oppose	
19	Wise Response Society	19.1	Oppose	[Note: Decision requested beyond the scope of Plan Change 6AA]
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Support	
1003	Fraser McRae		Support	 Withdraw Plan Change 6AA Initiate a plan change to update the OVERSEER version in Rule 12.C.1.3 Seek Environment Court consent to change catchment/river to freshwater management units in Plan Change 6A's tables and schedules
20	Dairy NZ	20.1	Support	Approve Plan Change 6AA as notified.
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Oppose	

2 Schedule 16 – Implementation Date

There have been no submission for Schedule 16's implementation date only.

3 Overseer – Implementation Date

Sub/Further Sub Number	Submitter Name/ Further Submitter Name	Submission Point	Position	Decision Requested
5	Carl Cleaver	5.1	Oppose	Withdraw proposed change to Rule 12.C.1.3.

	ub/Further Sub	Submitter Name/	Submission Point	Position	Decision Requested
N	umber	Further Submitter Name			
1	001	Guardians of Lake Wanaka &		Support	
		Guardians of Lake Hawea			

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

4 Matters beyond the scope

Submission Number	Submitter Name	Submission Point	Position	Decision Requested
5	Carl Cleaver	5.2	Oppose	Change the status of activities managed under Rule 12.C.1.1 from permitted to prohibited.
19	Wise Response Society	19.1	Oppose	Adopt an alternative option that: • Cancels the current requirement of a resource consent by April 2020. • Changes Rule 12.C.1.3 (Overseer) to require the use of the latest Overseer version, or other approved model, to be used by a Certified Nutrient Management Advisor employed by the Regional Authority. • Shifts the focus from discharge contaminant concentration to nutrient input budget and modelled discharge values; and require compliance by 2025. • Prohibits discharges which from 2025 do not comply with nutrient input budgets and modelled discharge values requirements. [Note: Decision requested beyond the scope of Plan Change 6AA]
1001	Guardians of Lake Wanaka & Guardians of Lake Hawea		Support	The second of th
1003	Fraser McRae		Support	 Withdraw Plan Change 6AA Initiate a plan change to update the OVERSEER version in Rule 12.C.1.3 Seek Environment Court consent to change catchment/river to freshwater management units in Plan Change 6A's tables and schedules