

From: Phil Murray <philh.murray@xtra.co.nz>
Sent: Friday, 3 September 2021 3:33 p.m.
To: RPS
Subject: Submission of COES on RPS
Attachments: ORC RPS submission.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Submission - Sector stakeholder, LATE

Please find attached our submission on the proposed RPS 2021.

Regards,

Phil Murray
Chair
Central Otago Environmental Society
027 2218133



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3 August 2021

To:

Chief Executive Officer
Otago Regional Council
Private Bag
DUNEDIN

Dear Madam,

RE: SUBMISSION OF COES TO DRAFT RPS

We note the short time frame for submitting on the Otago RPS. Our submission is therefore limited by time and therefore deals with only the most obvious matters we believe require attention.

Submit:

General tenor and direction of the ORPS

We support the general tenor and direction of the ORPS however the report deals in laudable generalities but fails to identify and address the specific underlying drivers causing the problem. For example the list of significant issues does not address the underlying causes such as declining water quality and loss of biodiversity being the result of inappropriate land use and management. The approach adopted tends to lead to addressing the symptom rather than the underlying cause.

Furthermore, the policies do not adequately support the objectives by dealing with the underlying causes.

Submit:

SRMR-15- Freshwater demand exceeds capacity in some places

Statement: This paragraph frames the problem as competing uses between environmental health, health and well-being needs of people and the ability of people to provide for their social, economic and cultural well-being which suggests the solution is balancing these competing uses. And yet earlier

statements in the RPS acknowledge that long term health and well-being of people is best served by ensuring the health and well-being of rivers. This paragraph should be redrafted to read:

Freshwater demand exceeds ecological capacity in some places

In water-short catchments ecological capacity may not allow demand for consumptive uses to be met.

SRMR-I6- Declining water quality has adverse effects on the environment, our communities, and the economy

Submit:

Statement: Extraction for irrigation resulting in lack of flushing and dilution of discharge is a major factor in effecting water quality and should be acknowledged in this paragraph.

Context: Extraction for irrigation is an important context effecting water quality in dryer parts of Central Otago and needs mentioning.

Impact snapshot: The Manuherikia has some of the most rapidly deteriorating water quality indicators in Otago caused by a combination of over allocation and rapid intensive land development and deserves mention in the second paragraph.

7 th paragraph urban development is mentioned as a major generator of sediment into lakes and rivers in Central Otago and yet this source will be minor compared to sediment from intensive agriculture which is not mentioned. Sediment from agriculture should therefore be mentioned in this paragraph.

SRMR-I10- Economic and domestic activities in Otago use natural resources but do not always properly account for the environmental stresses or the future impacts they cause

Submit:

Statement: Water abstraction itself does not cause all the stresses and adverse impacts. It should be amended to read *water abstraction particularly for irrigation* as this covers both the effect of reduced flows in the river and the effect of intensive agriculture that results from irrigation.

Economic: Mention should be made of the adverse economic impact from degraded natural environments such as rivers, lakes and high-country landscapes and the effect this has on tourism and the ability to attract skilled personal to live in the region.

SRMR-I11- Cumulative impacts and resilience

Submit:

Environmental: A statement should be included that states *faced with insufficient knowledge and understanding a precautionary approach should be taken when making decisions or setting policy around natural resource management.*

IM – Integrated management

Submit:

Objectives

IM-04-Climate change: This objective is an inadequate response to the most significant threat to the region. The objective should be to support the national objectives for climate change by reforming the economy and the pattern of settlement in Otago so that we are able to reach zero net carbon emissions by 2050.

Policies

IM-P10- Climate change adaptation and mitigation: A policy should be included requiring councils to consider ways for reducing carbon emissions and achieving energy efficiency in all their planning documents.

Methods

Submit:

IM-M1- Regional and district plans: Regional and district councils should be required to include in their plans policies and methods for reducing climate changing emissions.

Explanation: An anticipated outcome of the RPS policies is that there will be observable changes in community behaviour towards more sustainable lifestyles. Some of the major determiners of a more sustainable lifestyle are structural, the pattern of settlement that is allowed to establish, the presence or type of public transport that is provided or the provision of alternative ways of moving about such as bike paths. Other factors such as land use practices such as burning vegetation can have a major impact on carbon emissions. These factors should be addressed at a regional and district council level.

Part 3 – Domains and topics

LF – Land and freshwater

Submit:

LF-WAI-P3 Integrated management: A clause should be added to the effect; *Avoid the adverse effects of certain land uses by preventing or controlling land use changes or activities such as conversion to dairying on unsuitable soils close to vulnerable rivers and streams.*

A clause should be added to the effect; *contributes to the reduction of climate changing emissions with the aim of the region being carbon neutral by 2050.*

Explanation: Clause 4 and 5 simply deal with the effects, of use and development of land and with our current high carbon economy without dealing with the underlying cause. While clauses 4 and 5 are needed, two additional clause such as suggested are required.

LF – VM – Visions and management

Submit

Objectives

LF-VM-02-Clutha Mata-au FMU vision:

(7)(b)(ii) Reword to the effect: *The ecological function of all water bodies is protected and restored where degraded supported by innovative and sustainable land and water management practices which*

reduce discharges of nutrients and other contaminants to water bodies so they are safe for human contact, and

Explanation: The way this clause is worded innovative and sustainable land and water management practices are aimed to support food production rather than the ecological health of the river which is the councils principle responsibility.

(7)(b)(iii) Delete and replace with; *abstraction within the ecological capacity of the water bodies occurs from the main stems or groundwater in preference to tributaries.*

Explanation: It is not clear what is to be “sustained”.

(7)(b) Add clauses: *(iv)creative ecological approaches to reducing didymo.*
(v) No direct discharges of waste water to water bodies.

Explanation: Didymo is a threat to the ecological health of both Dunstan Creek and the Manuherikia and needs to be actively managed by allowing periodic flushing. There is no apparent reason why direct discharges of waste water should be acceptable in these water courses.

(8) Oppose the timeframe for outcomes to be achieved by 2050 for the Manuherikia to be replaced with 2033.

Explanation: The proposed timeframe gives ten years for farmers to make adjustments to their farming systems to adapt to new minimum flows and abstraction limits which is a realistic period for this to happen and avoids risks of exceeding an ecological threshold from which the river will not recover.

LF-VM-04 Taieri FMU vision;

(8) Reword to the effect: *“The ecological function of all water bodies is protected and restored where degraded supported by innovative and sustainable land and water management practices which reduce discharges of nutrients and other contaminants to water bodies so they are safe for human contact.*

LF-VM-P6 Relationship between FMU’s and rohe

Submit:

(2) Additional environmental outcomes should be set for the Manuherikia rohe.

(3) Limits and action plans to achieve environmental outcomes should be established for the Manuherikia rohe.

Explanation: The community surrounding the Manuherikia has been dominated by farming interests and consequently a non-regulatory approach will not work on its own. The community need to be supported by a regulatory framework of bottom lines in which to develop environmental outcomes and actions.

LF-FW- Fresh water

Objectives

LF-FW-08-Fresh water

Submit:

The objective is inadequate and needs to include reference to maintaining healthy ecological function and the natural character of all water bodies and not just its “outstanding water bodies”.

Policies

LF-FW-P7 Fresh water

Submit:

A clause should be added to the effect: *The natural character of all water bodies , where possible, should be maintained or, if degraded, restored.*

(5) A date by which time over-allocation is to be phased out should be included in this clause.

LF-FW-P8- Identifying natural wetlands

Submit:

A date should be included as to when wetlands are to be identified and mapped.

LF-FW-P13 Preserving natural character

Submit;

First paragraph should read; *Preserve and where possible enhance the natural character of lakes and rivers and their beds and margins by:*

(1)(a) Amend to read: *there is a functional need for the activity in that location that justifies the adverse effect being created.*

LF-LS-Land and Soils

Policies

LF-LS-P21 Land use and fresh water

Submit:

Include a clause to the effect: *Manage land uses that have an adverse effect on water quality that cannot be effectively managed through mitigation measures.*

Explanation: It is not possible to reduce indirect discharges of contaminants to water for some uses on some soil types such as dairying on alluvial soils adjacent to the Manuherikia. In these cases controls are required on such activities as intensive dairying and winter feeding forage crops.

Methods

LF-LS-M11 – Regional Plans

Submit

The methods 1 – 3 by themselves are simply inadequate and are unlikely to achieve the desired outcomes.

We propose that Regional Council identify areas within Otago where adverse effects on fresh water cannot be practically avoided, remedied or mitigated for certain land uses and where these land uses are discretionary activities.

LF_LS-M12- District plans

Submit:

(1) Manage land use change by:

Add clause (C) controlling land use change to intensive dairy within areas identified by the ORC as sensitive to uncontrolled discharge of nutrients and sediment.

Thankyou for the opportunity to submit on this document.

Regards,

A handwritten signature in black ink, appearing to read 'Phil Murray', with a horizontal line underneath.

Phil Murray
Chair
COES