

Written Submission on Proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)

To: Otago Regional Council

1. **Name of submitter** (full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)

Gavan James HERLIHY

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.
3. I ~~could~~/**could not** (Select one) gain an advantage in trade competition through this submission. (See notes to person making submission)
4. I ~~am~~/**am not** (Select one) directly affected by an effect of the subject matter of the submission that
- a. adversely affects the environment; and
  - b. does not relate to trade competition or the effects of trade competition (See notes to person making submission)
5. I ~~wish~~/~~do not wish~~ (Select one) to be heard in support of my submission
6. If others make a similar submission, I ~~will~~/**will not** (Select one) consider presenting a joint case with them at a hearing

7. **Submitter Details**

- a. **Signature of submitter** (or person authorised to sign on behalf of submitter)



- b. **Signatory name, position, and organisation** (if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)

Name  
Position  
Organisation

- c. **Date**

2.9.2021

**Address for service of submitter** (This is where all correspondence will be directed)

**d. Contact person** (name and designation, if applicable)

Gavan Herlihy

**e. Email:**

herlihy@extra.co.nz

**f. Telephone:**

0274 764011

**g. Postal address** (or alternative method of service under section 352 of the Act):

24 Penrith Park Drive, Waiwaka

**8. My submission is:** (See attached 5 pages.)

Column 1	Column 2	Column 3	Column 4
<p>The <b>specific provisions</b> of the proposal that my submission relates to are:</p> <p>(Please enter the relevant objective, policy, method, or 'other' provision reference where possible. For example, 'AIR-01'.)</p>	<p>I <b>support</b> or <b>oppose</b> the specific provisions or wish to have them <b>amended</b>.</p> <p>(Please indicate "support" or "oppose" or "amend")"</p>	<p>The <b>reasons</b> for my views are:</p>	<p>I seek the following <b>decision</b> from the local authority:</p> <p>(Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)</p>

**Note:** Additional rows for each separate provision or submission point should be added as required.

Submission on :

**THE PROPOSED OTAGO REGIONAL POLICY STATEMENT**

This submission deals with two general issues:

- a) The Use of Otago's, natural and Physical Resources – the Primary Production Sector
- b) The Disconnect between the use of Land and the use of Water

and one specific issue :

- c) The Taieri FMU

***a) The use of Otago's natural and physical resources***

a) 1. I quote from the Forward or mihi .....*to create a future of opportunity and security for all of us .*

Further the Purpose ( page 5 ) states *The Otago Regional Policy Statement ( ORPS) provides a policy framework that aims to achieve long term environmental sustainability by integrating the protection, restoration enhancement ,and use of Otago's natural and physical resources*

a) 2. Both the above objectives are laudable and are supported by the submitter

a) 3. As a general comment the pRPS is very strong on outlining a pathway to achieving environmental sustainability from the "*protection, restoration, enhancement*" perspective , but is lamentably short on the pathway relating to the contribution of the "*use of Otago's natural and physical resources*" towards environmental sustainability.

a) 4. The cornerstone of Otago's economy is the sustainable use of its base resources, its land , its water, its people. The role of primary production has and will continue to be fundamental to achieving the basic objective .....*to create a future of opportunity and security for all of us.....*

a) 5. The importance of the primary sector within Otago , is not articulated clearly enough within the document - if that factor is indeed recognised at all. The primary sector needs to be recognised as an important land use and most importantly as part of community. This anomaly must be addressed in the RPS as proposed.

**b) *The disconnect between the use of land and the use of water***

b) 1. I wish to submit on the document's total disconnect between the role of the use of water resources to the use of its land.

To quote page 137 LF-LS-011 - Land and soil :

*The life supporting capacity of Otago's soil resources is safeguarded and the availability and productive capacity of highly productive land for primary production is maintained now and for future generations*

In the semi arid areas of the province ( namely Central Otago ) the highly productive soils of the horticultural land adjacent to the Clutha River that produce the traditional crops of apples and apricots is only "highly productive" because of the use of water.

Further it is the sustainable use of water that has enabled land formerly classified as "unproductive" to convert to growing grapes and cherries on hundreds of hectares of land in the wider Cromwell/Tarras/Wanaka region.

In short the "life supporting capacity" of soils in vast areas of Otago is only achieved with the use of water.

b) 2. A substantial rewrite of the proposed Regional Policy Statement needs to reflect the role of and contribution to the "wider community" of the use of the regions water – a vital resource if the RPS is required to ....*create a future of opportunity and security for all of us...*

**c) *Taieri FMU vision***

c) 1. It is understood that the Taieri FMU will be broken up into three sectors, namely the Maniototo, the Strath Taieri and the Taieri Plains/Coastal section. This submission deals specifically with the Maniototo or what is commonly referred to as the Upper Taieri.

c) 2. The identification of resources in the pRPS to be managed are not complete and rather selective . Issues that should rate a mention in this "high level" document include :

- the role of the Loganburn Reservoir
- the role of irrigation
- the role of storage
- the role of pest management
- "weed control" - willow removal
- relationship of the Taieri FMU process with the Maniototo Tiaki project
- wetlands

c) 3. No assessment of the Taieri FMU process in determining the future use of the regions water resources can be done without fully recognising and documenting the current role of the water controlled by the Maniototo Irrigation Co Ltd as supplied by the Loganburn Reservoir.

c) 4. The role that irrigation has and must continue to play in delivering to the purpose of the RPS must be fully considered. Further the part that irrigation can play in the communities resilience to climate change must be considered in the FMU process.

c) 5. The role of storage and the addition of additional storage of "surplus" water in the Upper Taieri Catchment must rate a focus in a high level planning document such as the Otago RPS

c) 6. The role of wildlife in degrading water quality in this section of the Taieri must be acknowledged and confronted. ( Maniototo farmers banded together earlier this week 31.8.21 and shot 2,600 wild geese in a short section of the Upper Taieri scroll plain. A positive step forward in being proactive in improving water quality in the catchment)

c) 7. For the RPS to progress the issue of the required flows in the Upper Taieri from an environmental perspective the issue of willow control and removal from the scroll plain must be considered . The amount of water being "sucked up" by these introduced "weeds" must be documented and acted on.

c) 8. The Maniototo Tiaki project involves the expenditure of \$ 4.5 in projects to improve the environmental outcomes of the Upper Taieri region over the next 5 years. Any outcomes developed by the the RPS Taieri MFU process must be developed in concert with the community driven Maniototo Tiaki project.

c) 9. The pRPS section relating to wetlands refers to only "restoring wetlands". I would contend that greater environmental gains from a wetlands perspective would be achieved through "creation of and enhancement " of existing wetlands

Gavan J Herlihy

2/9/21



Chair Sowburn Water Co Ltd

Coordinator of the Pigburn Water Users Group

Chair of Greenbank Pastoral Ltd and Hamiltons Dairy Ltd ( both companies being shareholders of the Maniototo East Side irrigation Co Ltd )

Semi retired farmer and long term Upper Taieri community person.

## RPS

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**From:** herlihy@xtra.co.nz  
**Sent:** Thursday, 2 September 2021 4:52 p.m.  
**To:** RPS  
**Subject:** pRPS Submission  
**Attachments:** CCE\_000178.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Submission - Individual

Form 5 and submission script attached.  
Please confirm receipt of this submission  
I wish to speak in support of this submission  
Thanks  
Gavan Herlihy