

Written Submission on Freshwater Planning Instrument Parts of

Proposed Otago Regional Policy Statement 2021

Submissions must be received by Otago Regional Council by 3 pm Tuesday 29 November 2022

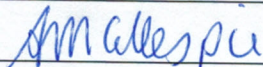
To: Otago Regional Council

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)

Manuherikia Catchment Group (Incorporated Society) MCG

2. This is a submission on the **Freshwater Planning Instrument Parts of Proposed Otago Regional Policy Statement 2021**.
3. MCG **could not** gain an advantage in trade competition through this submission.
4. MCG **are** directly affected by an effect of the subject matter of the submission that
- adversely affects the environment; and
 - does not relate to trade competition or the effects of trade competition (See notes to person making submission)
5. MCG **wish** to be heard in support of my submission
6. If others make a similar submission, **I will** 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: Anna Gillespie

Position: Chair

Organisation: Manuherikia Catchment Group

The Manuherikia Catchment Group(MCG) is an incorporated society that represents the water users and some community members in the Manuherikia Catchment.

- c. **Date**

24/10/2022

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

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

Susie McKeague

e. Email:

susie@mckconsultancy.co.nz

f. Telephone:

0279671858

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

McKeague Consultancy Ltd, Level 7 John Wickliffe House, 265 Princess St, Dunedin

8. My submission is:

Column 1	Column 2	Column 3	Column 4
The <i>specific provisions</i> of the proposal that my submission relates to are: (Please enter the relevant objective, policy, method, or 'other' provision reference where possible. For example, 'AIR-01'.)	I <i>support</i> or <i>oppose</i> the specific provisions or wish to have them <i>amended</i>. (Please indicate "support" or "oppose" or "amend")	The <i>reasons</i> for my views are:	I seek the following <i>decision</i> from the local authority: (Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)
LFVM Visions and Management Objective LF VM 02	Support (1)(a)	Support given the provisions remain the same	
	Support (1)(b)	Support given the provisions remain the same	
	Support (2)	Support given the provisions remain the same	
	Support (3)	Support given the provisions remain the same	
	Support (4)	Support given the provisions remain the same	

	Support (5)	<i>Support given the provisions remain the same</i>	
	Support (6)	<i>Support given the provisions remain the same</i>	
	(7)(a)	<i>Remain neutral</i>	
	Amend (7) (b) (i)	<p><i>"Sustain and where ever possible restore natural form and function to support Kai Tahu values and practices"</i> is a statement that lacks the detail to be able to determine if it is suitable for the FMU. As a vision statement it is not suitable to be used as an outcome as it is in (8).</p>	The Kai Tahu values and practices that are to be supported need to be stated in this vision statement.
	Amend (7)(b) (ii)	<p>We do not agree that innovative land practices are required as a vision for the FMU. There are many non innovative, common or traditional land practices that are sustainable and have a positive or neutral impact on the well being of the whenua and awa and a strong social and economic impact.</p> <p><i>"Food" production</i> is a limiting description of land use options. This is where the word 'innovative' should be used, as land use should at least include fibre but may also support recreational, industrial, tree nursery and tourism ventures such as hospitality centres.</p>	<p>Remove 'Innovative'</p> <p>Remove 'food production' and add innovative: to support 'innovative land use' in the area</p>
	Oppose (7)(b)(iii)	<p>We do not agree that there should be a vision that dictates a preference of main stem and groundwater abstraction over tributaries. As long as the waterbody of the site of abstraction is looked after then the fact it is a tributary over a main stem is irrelevant.</p> <p>Many abstraction locations have multiple reasons for their selection that include but are not limited to: the location is right beside the farm where the water is used, it is the only source that is available for that farm and utilises gravity</p>	Remove (iii)

		delivery. It is impractical and in many cases impossible to change location of abstraction and the loss of tributary water would leave that farm or those farms stranded dry.	
	(7)(c)(i)	<i>Remain neutral</i>	
	(7)(c)(ii)	<i>Remain neutral</i>	
	(7)(c)(iii)	<i>Remain neutral</i>	
	(7)(c)(iv)	<i>Remain neutral</i>	
	Amend (8)(a) (8)(b) (8)(c)	<p>It is impossible determine if the timeframe for change in the Manuherekia rohe make any sense because the vision statements in (7) are not outcomes.</p> <p>In some cases the time frame of 2050 seems too long. Example: <i>that water bodies are safe for human contact by 2050</i>, that is in 30 years? Given that many sites are safe for the majority of the time when people want to swim now, a 30 year window seems too long.</p> <p>However as it is not clear exactly what Kai Tahu values and practices the Manuherekia is required to support and any consequential changes then a logical timeframe is hard to know.</p>	Link any timeframes to clear outcomes for the rohe
RMIA – WAI-15 <i>Concerns of Kāi Tahu, water allocation concerns</i> <i>The impact of cross mixing of water from different catchments on the distinctive mauri of the water bodies</i>	Amend Note that there may be cases where it meets an integrated and holistic water management approach to transfer water out of a catchment	There are scenarios in the Manuherekia catchment where water is utilised outside the catchment. The water is crucial for some very dry areas of Central Otago.	We note this is a specific concern of Kāi Tahu but do not support a vision, timeframe or policy completely excluding this practice in Otago.
	Amend (7) (b) (i)	<i>"Sustain and where ever possible restore natural form and function to support Kai Tahu values and</i>	The Kai Tahu values and practices that are to be supported need

		<p><i>practices</i>” is a statement that lacks the detail to be able to determine if it is suitable for the FMU. As a vision statement it is not suitable to be used as an outcome as it is in (8).</p>	to be stated in this vision statement.
	Amend (7)(b)(ii)	<p>We do not agree that innovative land practices are required as a vision for the FMU. There are many non innovative, common or traditional land practices that are sustainable and have a positive or neutral impact on the well being of the whenua and awa and a strong social and economic impact.</p> <p><i>“Food” production</i> is a limiting description of land use options. This is where the word ‘innovative’ should be used, as land use should at least include fibre but may also support recreational, industrial, tree nursery and tourism ventures such as hospitality centres.</p>	<p>Remove ‘<i>Innovative</i>’</p> <p>Remove ‘<i>food production</i>’ and add innovative: to support ‘<i>innovative land use</i>’ in the area</p>
<p>Note: Additional rows for each separate provision or submission point should be added as required.</p>			