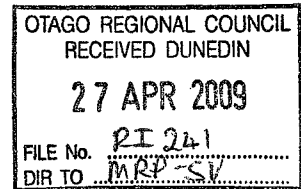


FURTHER SUBMISSIONS IN SUPPORT OF OR IN OPPOSITION TO SUBMISSIONS  
ON A PROPOSED PLAN CHANGE UNDER CLAUSE 8 OF THE FIRST SCHEDULE  
TO THE RESOURCE MANAGEMENT ACT 1991

To: Otago Regional Council  
Private Bag 1954  
DUNEDIN 9054



Attention: Policy Team

Submissions on: Proposed Plan Change 1B (Minimum Flows) and 1C (Water Allocation and Use) to the Regional Plan: Water for Otago

Name: TrustPower Limited (TrustPower)

Address: Private Bag 12023  
Tauranga

Contact Person: Laura Peddie, Environmental Officer  
Phone: 07 574 4888 (extn 4304)

Further submissions from TrustPower on Proposed Plan Changes 1B and 1C are attached to this document in table form.

TrustPower wishes to be heard in support of its submission.

If others make similar submissions, TrustPower would be prepared to consider a joint case.

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Signature: Laura Peddie  
Environmental Officer

Date:

Address for Service: TrustPower Limited  
Private Bag 12023  
Tauranga

Attention: Laura Peddie

Telephone: 07 574 4888 (extn 4304)

Facsimile: 07 574 4877



## TrustPower Limited – Table of Further Submissions on Proposed Plan Change 1C

Submitter	Sub. Ref.	Provision Submitted On	Summary of Submission	Support / Oppose	Submitter's Justification
Federated Farmers of New Zealand	42/10	Policy 6.4.0B	<p>Add bullet points to existing bullet point list in Explanation as follows:</p> <ul style="list-style-type: none"> <li>• Voluntary approach initiated by consent holders</li> </ul>	Support	The Federated Farmers of New Zealand submission has synergies with the TrustPower submission that membership of water management groups should be voluntary, and is therefore supported.
Oceana Gold (New Zealand) Limited	49/10	Policy 6.4.0B	<i>The wording of the Policy or Explanation should make it explicit that such shared use and management groups are voluntary, and that any member that has opted into a group may also opt out.</i>	Support	This submission has synergies with the TrustPower submission that membership of such groups should be voluntary, and is therefore supported.
Oceana Gold (New Zealand) Limited	49/10	Policy 6.4.0B	<i>That the wording of the Policy or Explanation make it clear that Council will be open to assisting such groups, and aid in the controlling and steering of the group dynamics to ensure proper and fair</i>	Support	The Ocean Gold submission seeks that the ORC plays a significant role in the operation of the management groups to ensure that the decisions made a fair and reasonable. This has synergies with the TrustPower submission that decisions made by such groups which adversely impact on the consents of non-members, require the approval of that consent holder before implementing any decisions.
Oceana Gold (New Zealand) Limited	49/10	Policy 6.4.0B	<i>That the wording of the Policy or Explanation be amended to ensure that an applicant or consent holder that is not in such a group, is not disadvantaged.</i>	Support	This is a similar submission to that of TrustPower which seeks that decisions made by such groups which adversely impact on the consents of non-members require the approval of that consent holder prior to proceeding.

Contact Energy Limited	52/10	Policy 6.4.0B	<p>Add after the paragraph addressing Infrastructure in the Explanation a new paragraph as follows or to like effect:</p> <p><i>"In the implementation of this Policy adverse effect on the availability of water for hydro-electric generation should be considered and avoided (such as in moving the point of take within an area)."</i></p>	Support	TrustPower shares similar concerns to Contact Energy in relation to protecting existing use rights for hydro-electric power schemes, and therefore the potential for hydro-electric generation to be affected by the decisions made by such groups needs to be recognised.
HW Richardson Group Ltd	18/23	Appendix 2A	<p>Amend Appendix 2A to provide greater detail and transparency regarding water management group's criteria for appointment, their functions and their reporting requirements.</p>	Support	Similar concerns were raised by TrustPower with respect to the functions and powers of the management groups, being clearly addressed within the Plan.
Contact Energy Limited	52/12	Policy 6.4.1	<p>Delete and substitute from the third paragraph of the Explanation [to read] as follows:</p> <p><i>"Allocation quantities and minimum flows do not apply to surface water takes from Lakes Dunstan, Hawea, Roxburgh, Wanaka or Wakatipu, or the main stem of the Clutha/Mata-Au or Kawarau Rivers (where minimum flows are set by resource consent in some cases). While there is no specific allocation or minimum flow, it is acknowledged that cumulative consumptive takes reduce water available for the non consumptive use of electricity generation. Takes from these water bodies are full discretionary activities in terms of this Plan."</i></p>	Support	Similar concerns were raised by TrustPower with respect to the derogation of existing use rights for hydro-electric power schemes. TrustPower supports this submission as it acknowledges the issue of water allocations and minimum flows having the potential to impact on non-consumptive uses such as hydro-electric power schemes
Contact Energy Limited	52/12	Policy 6.4.1	<p>Amend the Principal reasons for adopting as follows:</p> <p><i>"This policy is adopted to enable consumptive users' access to surface water while sustaining aquatic ecological values and the availability of water for hydro electric generation."</i></p>	Support	Similar concerns were raised by TrustPower with respect to the protection of legally established hydro-electric power schemes, and acknowledging their non-consumptive nature.

Otago Water Resource Users Group	41/78	Rule 12.1.4.8	<i>That proposed deleted paragraphs (g) and (h) not be deleted</i>	Support	This is identical to the submission made by TrustPower which seeks to retain both paragraphs given that the continued operation of hydro-electric power schemes is of national importance, and removal of these paragraphs may derogate from existing consents for hydro-electric power schemes.
Pioneer Generation Ltd	38/9	Policy 6.4.0A	<i>Add a further clause to the last sentence of the Principal Reasons for Adopting as follows: "This will enable more people to benefit from water available for consumptive use, and water retained for hydro-electric power generation."</i>	Support	This submission seeks to place emphasis on the need to retain water for hydro-electric power schemes and is therefore supported by TrustPower.
Contact Energy Limited	52/9	Policy 6.4.0A	<i>Add a further clause to the last sentence of the Principal Reasons for Adopting as follows: "This will enable more people to benefit from water available for consumptive use, and water to be retained for hydro-electric power generation."</i>	Support	This submission seeks to place emphasis on the need to retain water for hydro-electric power schemes and is therefore supported by TrustPower.
Pioneer Generation Ltd	38/11	Policy 6.4.0C	<i>Delete the last sentence from the first paragraph of the Explanation [to read] as follows: "...require adequate water supply." Add a fourth paragraph to the Explanation as follows or to like effect (additional text shown underlined): "In considering an application to take water and competing lawful local demands the Council will consider the need to avoid adverse impact on the availability of water for hydro-electric generation."</i>	Support	This submission seeks to place emphasis on the need to retain water for hydro-electric power schemes and is therefore supported by TrustPower.

Contact Energy Limited	52/11	Policy 6.4.0C	<i>Delete the last sentence from the first paragraph of the Explanation [so that it reads] as follows: "...require adequate water supply." Add a fourth paragraph to the Explanation as follows or to like effect: "In considering an application to take water and competing lawful local demands the Council will consider the need to avoid adverse effects on the availability and use of water for hydro-electric generation."</i>	Support	This submission seeks to place emphasis on the need to retain water for hydro-electric power schemes and is therefore supported by TrustPower.
Otago Water Resource Users Group ("OWRUG")	41/10	Information Requirements 16.3.1	<i>(a) The requirement to provide the information [in 4A] should not be obligatory for all applications but should only be required when the circumstances of the case warrant it; and (b) When considering whether the information [in 4A] should be provided, the matters the Council shall take into account shall include those identified [by the submitter in Section 17.1 of their submission, and summarised in the first sentence of "reasons"].</i>	Support	The OWRUG submission is very similar to that prepared by TrustPower, relating to the requirement with consent applications for an assessment of all other possible water sources along with feasibility studies including costs and benefits of taking from each alternative source. TrustPower opposed such an assessment being applied across the board as it is not appropriate in all cases. Accordingly, TrustPower supports this submission.
Pioneer Generation Ltd	38/30	Policy 6.4.19	<i>Reinstate Policy 6.4.19.</i>	Support	Pioneer Generation Limited's submission is similar to that of TrustPower, and is therefore supported.
Otago Water Resource Users Group ("OWRUG")	41/10	Policy 6.4.19	<i>Reinstate Policy 6.4.19.</i>	Support	OWRUG's submission is similar to that of TrustPower, and is therefore supported.
Federated Farmers of New Zealand (Inc)	42/30	Policy 6.4.19	<i>Reinstate Policy 6.4.19.</i>	Support	Federated Farmer's submission is similar to that of TrustPower, and is therefore supported.

Horticulture New Zealand	44/30	Policy 6.4.19	<i>Reinstate Policy 6.4.19.</i>	Support	Horticulture New Zealand's submission is similar to that of TrustPower, and is therefore supported.
Pioneer Generation Limited	38/137	6.2 Issues	<p><i>Suggests the addition of the following Issues:</i></p> <p><i>"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."</i></p> <p><i>"The cumulative effects of the taking of water may:</i></p> <ul style="list-style-type: none"> <li><i>i) result in reductions of water quality and aquatic habitat</i></li> <li><i>ii) limit the availability of water for other actual and potential uses</i></li> <li><i>iii) compromise the generation of renewable energy."</i></li> </ul>	Support	<p>This submission by Pioneer Generation Limited seeks to include an additional Issue relating to the inefficient allocation and use of water having a potentially significant impact on renewable energy generation. TrustPower supports the inclusion of such an issue given the local, regional and national significance of renewable power generation.</p> <p>The Policy Planner deems this submission to be outside the scope of the Plan Change though TrustPowers consider there to be grounds for its inclusion, which will be addressed at the hearing.</p>
Contact Energy Limited	52/137	6.2 Issues	<p><i>Suggests the addition of the following Issues:</i></p> <p><i>"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."</i></p> <p><i>"The cumulative effects of the taking of water may:</i></p> <ul style="list-style-type: none"> <li><i>i) result in reductions of water quality and aquatic habitat</i></li> <li><i>ii) limit the availability of water for other actual and potential uses</i></li> <li><i>iii) compromise the generation of renewable energy."</i></li> </ul>	Support	<p>This submission by Contact Energy Limited seeks to include an additional Issue relating to the inefficient allocation and use of water having a potentially significant impact on renewable energy generation. TrustPower supports the inclusion of such an issue given the local, regional and national significance of renewable power generation.</p> <p>The Policy Planner deems this submission to be outside the scope of the Plan Change though TrustPower considers there to be grounds for its inclusion, which will be addressed at the hearing.</p>

Pioneer Generation Limited	38/137	Policy 6.4.0B	<p><i>Seeks the inclusion of two new Objectives as follows:</i></p> <p><i>"The continued availability of water currently (at the date of notification of this change) used for renewable energy generation."</i></p> <p><i>"Enable people and communities to provide for their social, economic and cultural wellbeing by providing water for hydro-electricity generation."</i></p> <p><i>Seeks that the Explanation for these Objectives be provided as follows:</i></p> <p><i>"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]."</i></p>	Support	<p>This submission follows on from the Issue raised above and TrustPower supports its inclusion in the Plan.</p> <p>The Policy Planner deems this submission to be outside the scope of the Plan Change though TrustPower considers there to be grounds for its inclusion, which will be addressed at the hearing.</p>
Contact Energy Limited	52/137	Policy 6.4.0B	<p><i>Seeks the inclusion of two new Objectives as follows:</i></p> <p><i>"The continued availability of water currently (at the date of notification of this change) used for renewable energy generation."</i></p> <p><i>"Enable people and communities to provide for their social, economic and cultural wellbeing by providing water for hydro-electricity generation."</i></p> <p><i>Seeks that the Explanation for these Objectives be provided as follows:</i></p> <p><i>"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]."</i></p>	Support	<p>This submission follows on from the Issue raised above and TrustPower supports its inclusion in the Plan.</p> <p>The Policy Planner deems this submission to be outside the scope of the Plan Change though TrustPower considers there to be grounds for its inclusion, which will be addressed at the hearing.</p>



Pioneer Generation Limited	38/137	Policy 6.4.0B	Seeks the addition of a policy as follows or to like effect: <i>"The benefits to be derived from the use of water for the generation of renewable energy" when establishing allocation.</i>	Support	This submission follows on from the Objective raised above and TrustPower supports its inclusion in the Plan.  The Policy Planner deems this submission to be outside the scope of the Plan Change though TrustPower considers there to be grounds for its inclusion, which will be addressed at the hearing.
Contact Energy Limited	52/137	Policy 6.4.0B	Seeks the addition of a policy as follows or to like effect: <i>"The benefits to be derived from the use of water for the generation of renewable energy" when establishing allocation.</i>	Support	This submission follows on from the Objective raised above and TrustPower supports its inclusion in the Plan.  The Policy Planner deems this submission to be outside the scope of the Plan Change though TrustPower considers there to be grounds for its inclusion, which will be addressed at the hearing.
Otago Fish and Game Council	21/137	Rule 12.1.2.4 and 12.1.2.5	<i>The amended 12.1.2.4 and 12.1.2.5 could have the identified wetland conditions amended to read: "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."</i>	Oppose	TrustPower considers the submission of Otago Fish and Game goes too far and that only wetlands identified in the Plan should be captured by these rules. To do otherwise may place undue constraints on landowners and consent holders.  The Policy Planner deems this submission to be outside the scope of the Plan Change. Given Otago Fish and Game may dispute this exclusion. TrustPower considers it appropriate to further submit on this point.

Otago Fish and Game Council	21/137	Rule 12.1.2.6	<i>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, or any wetland greater than 1000m<sup>2</sup> in area", and/or (b) to read: "The taking does not result in the lowering of the level of water in any lake, river or wetland; and".</i>	Oppose	TrustPower opposes the submission by Otago Fish and Game for the reasons outlined above. Only identified wetlands should be captured by this rule.  The Policy Planner deems this submission to be outside the scope of the Plan Change. Given Otago Fish and Game may dispute this exclusion, TrustPower considers it appropriate to further submit on this point.
Otago Fish and Game Council	21/137	Methods Other than Rules 15.3	<i>Believe the Council should eliminate all mining rights that have not been exercised.</i>	Oppose	TrustPower considers there to be no justification for derogating these rights or eliminating them all together.  The Policy Planner deems this submission to be outside the scope of the Plan Change. Given Otago Fish and Game may dispute this exclusion, TrustPower considers it appropriate to further submit on this point.
Otago Fish and Game Council	21/137	Objective 6.3.1	<i>Objective 6.3.1 could read: "To retain and reinstate flows in rivers sufficient to maintain their life-supporting capacity for aquatic ecosystems, and their natural character."</i>	Oppose	TrustPower opposes the submission of Otago Fish and Game with respect to Objective 6.3.1. The inclusion of the term 'reinstate' implies that rights associated with existing consents could be derogated from in meeting this objective.  The Policy Planner deems this submission to be outside the scope of the Plan Change. Given Otago Fish and Game may dispute this exclusion, TrustPower considers it appropriate to further submit on this point.

<p>Pioneer Generation Limited</p>	<p>38/137</p>	<p>6.1 Introduction</p>	<p><i>Retain the reference to hydro-electric power generation in the first sentence of the Introduction [Section 6.1].</i></p> <p><i>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:</i></p> <p><i>"...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."</i></p> <p><i>Amend the first sentence of the sixth paragraph [of Section 6.1] as follows or to like effect: "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..."</i></p>	<p>Support</p>	<p>The submission by Pioneer Generation Limited is similar to that made by TrustPower in its initial submission, and is therefore supported.</p> <p>Overall the Plan needs to further recognise the importance of renewable energy generation: locally, regionally and nationally, given in particular the importance placed on it under Part 2 of the Act.</p> <p>It is noted that this submission is deemed to be outside the scope of the Plan Change. TrustPower plans to address this at the hearing.</p>
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Contact Energy Limited	52/137	6.1 Introduction	<p><i>Retain the reference to hydro-electric power generation in the first sentence of the Introduction [Section 6.1].</i></p> <p><i>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:</i></p> <p><i>"...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."</i></p> <p><i>Amend the first sentence of the sixth paragraph [of Section 6.1] as follows or to like effect: "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..."</i></p>	Support	<p>The submission by Contact Energy Limited is similar to that made by TrustPower in its initial submission, and is therefore supported.</p> <p>Overall the Plan needs to further recognise the importance of renewable energy generation: locally, regionally and nationally, given in particular the importance placed on it under Part 2 of the Act.</p> <p>It is noted that this submission is deemed to be outside the scope of the Plan Change. TrustPower plans to address this at the hearing.</p>
Cromwell Branch of Federated Farmers Limited	58/137	Not stated	<p><i>Would like the Council to retain the same type of privileges as the mining priority has now, in the new RMA water consents.</i></p>	Support	<p>TrustPower supports the submission by the Cromwell Branch of Federated Farmers that the existing privileges be retained.</p> <p>It is noted that this submission is deemed to be outside the scope of the Plan Change. TrustPower plans to address this at the hearing.</p>



**FURTHER SUBMISSION FORM**  
Further submission in support of, or in opposition to,  
**Submission on Proposed Plan Change 1C: Water Allocation**  
**And Use to the Regional Plan: Water for Otago**

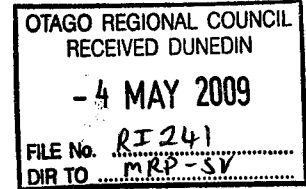
**102**  
Office Use Only

Form 6, Clause 8 of the First Schedule, Resource Management Act 1991

Full name of further submitter: Devon Christensen

Name of organisation (if applicable): Fish and Game

Postal Address: Number/Street: PO Box 150  
Suburb:  
Town/City: Temuka  
Postcode: 7948



Telephone: 03 615 8400

Fax: 03 615 8401

Email: dchristensen@csifgc

Contact person: Devon Christensen

I wish to be heard in support of my further submission.

If others make a similar submission, I will not consider presenting a joint case with them at a hearing.

Date: 4/05/2009 10:10:58

**Please note that all further submissions are made available for public inspection.**

**Signatures are not required for further submissions made electronically.**

**Further Submissions must be received by 5pm, Tuesday 5 May 2009.**

My further submission relates to:

I oppose the submission of:

Name of original submitter:

Address of original submitter:

Number of original submission: 19,20,23,

Fish and Game oppose submissions requesting no minimum flow to be set in Welcome Creek and support the retention of the 700l/s minimum flow.

**The particular parts of submission I oppose are:**

Fish and Game appreciate that Welcome Creek may be currently maintained and cared for by current irrigators, but this does not provide security for the future maintenance of Welcome Creek. Having no minimum flow set on Welcome Creek could lead to a loss of motivation to maintain and monitor the creek. By retaining the minimum flow at 700l/s ODC is ensuring ongoing maintenance and preventing future degradation.

Historically Welcome Creek supported a good resident trout fishery. In the early 1980's MAF operated a fish trap in the lower reaches of the stream. Webb et al reports the fisheries values as follows:

'The stream supports a spawning run of brown trout, with occasional quinnat salmon and rainbow trout. Eleven native fish species have been recorded, including all those found in the Maerewhenua River, together with short-finned eel, inaunga, bluebilled bully, and black flounder.'

While still maintaining a good resident trout fishery; it is unlikely that Welcome Creek still supports the diverse and abundant fish populations it once did. Deleting or altering minimum flow guidelines may eventuate in further loss of fish habitat. Evidence supporting this can be seen in research carried out by Jowett et al (2005) that showed in the Waipara River, where habitat is limited at low flow, the detrimental effect on fish numbers increased with the magnitude and duration of low flow.

With LWIS development, lands bordering Welcome Stream have been progressively cleared for pasture production and irrigation. Riparian margins, once extensive, have been reduced to less than 10m in general and in some places are now non existent. Wintering over of cattle and dairy cows in and along the creek has degraded the creek environment. In many places the once pristine stream bounded by willows and scrub has been reduced through inappropriate land use practices to a wide, shallow, heavily siltated channel with little riparian protection remaining. Submissions stating that Welcome Creek is a "healthy, vibrant ecosystem the way it is" may be forgetting, or unaware of what it once was. The loss or change of minimum flow guidelines will remove opportunities to enhance the creek (in order to restore past conditions) and will most likely lead to further degradation.

**The reasons for my opposition are:**

The recreational and ecological values of Welcome Creek are important for many members of our local community and people from outside the area as well. A meaningful minimum flow ensures that the irrigation of water does not jeopardize these values and the health of the Creek. Retention of the 700l/s minimum flow will provide safeguarding of the stream for the unforeseeable future.

**I seek the following decision from the local authority:**

**Please attach any additional information.**

**Important note to further submitter:**

A copy of your further submission must be served on the original submitter within five working days of making the further submission to Otago Regional Council.

**FURTHER SUBMISSIONS MUST BE RECEIVED BY 5.00PM ON TUESDAY 5 MAY 2009**

**Please send submissions to:**

Email: [policy@orc.govt.nz](mailto:policy@orc.govt.nz)

Post: Attn: Policy Team, Private Bag 1954, Dunedin 9054

Fax: (03) 479 0015 (Attn: Policy Team)

Deliver: 70 Stafford Street, Dunedin; or

William Fraser Building, Dunorling Street, Alexandra; or

The Station, 1<sup>st</sup> Floor, Cnr Shotover and Camp Streets, Queenstown





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Form 6

Further submission in support of, or in opposition to, submission on publicly notified  
proposed policy statement or plan

*Clause 8 of First Schedule, Resource Management Act 1991*

OTAGO REGIONAL COUNCIL RECEIVED DUNEDIN	
- 5 MAY 2009	
FILE No.	RF241
DIR TO	MAD-SV

To: Otago Regional Council

Name of person making further submission: Kenneth Murray Stewart

This is a further submission on a Proposed Plan Change 1C (Water Allocation & Use) to the plan:

Otago Regional Council Regional Plan: Water

**My submission is:**

The Director-General of Conservation has reviewed the summary of submissions on the proposed Plan Change 1C (Water Allocation & Use) and wishes to comment on the submission that directly affect the Director's primary concerns.

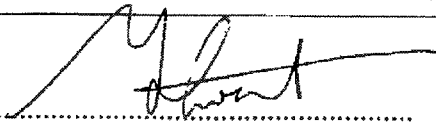
These comments are as set out in **Attachment One**

**I wish for the Otago Regional Council to make the following decision:**

Accept the amendments to and comments on the plan change the Director-General as described in Attachment One.

I wish to be heard in support of my further submission.

\* If others make a similar submission, I will consider presenting a joint case with them at a hearing.



Signature of person making further submission

Kenneth Murray Stewart

Acting Community Relations Manager

Otago Conservancy

Department of Conservation

Pursuant to a delegation from the Director-General of Conservation

.....  
Date 5<sup>th</sup> May 2009

Address for service of person  
making further submission:

Community Relations Manager

Otago Conservancy

Department of Conservation

PO Box 5244

**DUNEDIN 9058**

Telephone:

(03) 477-0677

Fax/email:

(03) 477-8626

Contact person: [*name and  
designation, if applicable*]

Bruce Hill

Community Relations Officer (Planning)

Ph (03) 474-6959

Email fbhill@doc.govt.nz

**Note to person making further submission**

A copy of your further submission must be served on the original submitter within 5 working days after making the further submission to the local authority.

**ATTACHMENT ONE**

<b>Submitters name</b>	<b>Submitter number</b>	<b>Reference number</b>	<b>Summary of submission</b>	<b>Oppose</b>	<b>Reason</b>
William Joseph Arthur	15	9	Add words "to provide" after the word "required" at the end of the second line. Under "Principal reasons for adopting" first line replace the word "avoided" with the word "minimised".	Oppose	Given that the available water in most catchments is finite the wastage of water should be avoided.
Hamish Winter	19	72	That Council not place a minimum flow on Welcome Creek.	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
Hamish Winter	19	74	That Council not place a minimum flow on Welcome Creek.	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
Hamish Winter	19	112.1	That Council not place a minimum flow on Welcome Creek.	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
Hamish Winter	19	113	That Council not place a minimum flow on Welcome Creek.	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
Waitensea Ltd	20	74	That no minimum flow is put on Welcome Creek	Oppose	The department considers a minimum flow, determined by the use of both

Resource Management (Forms, Fees, and  
Procedure) Regulations 2003

Schedule 1

					adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
Waitensea Ltd	20	112.1	That no minimum flow is put on Welcome Creek	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
Waitensea Ltd	20	113	That no minimum flow is put on Welcome Creek	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
Henry Robert Barry Zwies	23	72	That no minimum flow is put on Welcome Creek	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
Henry Robert Barry Zwies	23	74	That no minimum flow is put on Welcome Creek	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
Henry Robert Barry Zwies	23	112.1	That no minimum flow is put on Welcome Creek	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
Henry Robert Barry Zwies	23	113	That no minimum flow is put on Welcome Creek	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.

Resource Management (Forms, Fees, and  
Procedure) Regulations 2003

Schedule 1

					should be placed on Welcome Creek.
Carrick Irrigation Co	26	9	Change to 6.4.0A I would [like] made is under Principal Reasons for Adopting, replace the word "avoided" with "minimised".	Oppose	As the available water in most catchments is finite the wastage of water should be avoided.
Locharburn Grazing Company	29	137	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.	Oppose	Pursuant to section 143(3) of the RMA deemed permits (issued under the Mining Act 1926) expire 1 <sup>st</sup> October 2021.
Andrew John Brown	32	9	Remove Section 6.4.0A.	Oppose	As the available water in many catchments is finite its allocation needs to be effective and efficient. Policy 6.4.0A provides for this.
William John Pile	34	74	Oppose 12.1.4.4A. There should be no minimum flow put on Welcome Creek.	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
William John Pile	34	112.1	There should be no minimum flow put on Welcome Creek.	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
William John Pile	34	113	There should be no minimum flow put on Welcome Creek. [Monitoring] should be done at Ferry Road.	Oppose	The department considers a minimum flow, determined by the use of both adequate and robust data and also in consultation with the community, should be placed on Welcome Creek.
Criffel Irrigation Scheme	40	137	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	Oppose	Pursuant to section 143(3) of the RMA deemed permits (issued under the Mining Act 1926) expire 1 <sup>st</sup> October 2021.

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			rights.		
Horticulture New Zealand	44	78	Delete condition 12.1.4.8 (iii).	Oppose	As the available water in most catchments is finite, the effective use of the quantity of water taken should match the intended use.
Horticulture New Zealand	44	78	Delete condition 12.1.4.8 (xxii).	Oppose	As flows in many catchments are variable and unpredictable discretion should be given to the duration of consents.
Horticulture New Zealand	44	100	Delete condition 12.2.3.4. (iii).	Oppose	As the available water in most catchments is finite, the effective use of the quantity of water taken should match the intended use.
Horticulture New Zealand	44	100	Delete condition 12.2.3.4(xviii)	Oppose	As flows in many catchments are variable and unpredictable discretion should be given to the duration of consents.
Kawarau Station Ltd	47	8.42	The understanding of the hydrological characteristics should include the effect of deemed permits that have been operating for more than 100 years so their effect is not a separate consideration.	Oppose	Pursuant to section 143(3) of the RMA deemed permits (issued under the Mining Act 1926) expire 1 <sup>st</sup> October 2021.
TrustPower Ltd	51	15	Insert an 'exception' to Policy 6.4.2A as follows: "Any water body where water flow is not recorded, is unknown or flow recording devices do not provide an appropriate level of accuracy." Any similar amendments to like effect. Any consequential or other amendments that stem from the amendment of Policy 6.4.2A as proposed in this submission, including to amend the rules (such as Rule 12.1.4.8) to give	Oppose	Given that the available water in most catchments is finite its allocation needs to be effective and efficient. Policy 6.4.2A provides for this.

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			effect to this submission.		
TrustPower Ltd	51	78	Retain Rules 12.1.4.8 (g) and (h). Any similar amendments to like effect. Any consequential amendments that stem from the retention of Rules 12.1.[4].8 (g) and (h).	Oppose	Pursuant to section 143(3) of the RMA deemed permits (issued under the Mining Act 1926) expire 1 <sup>st</sup> October 2021.
TrustPower Ltd	51	78	Delete Rule 12.1.4.8 (xii). Any similar amendments to like effect. Any consequential amendments that stem from the deletion of Rule 12.1.4.8 (xii) [not Rule 12.1.8(xii) as requested].	Oppose	As flows in many catchments are variable and unpredictable discretion should be given to the duration of consents.
Cromwell Branch Federated Farmers of New Zealand	58	134	Seek the following outcomes from the plan change: 1) Align the water plan with the current direction and practice. 2) Enables easier consenting of water management groups or community groups. 3) Gives priority to local use of local water. 4) Increases flexibility of water management within a group situation. 5) Acknowledges the connection between groundwater and surface water resources. 6) Present takes retain relative priority for some individual takes. This helps protect assets of landowners who have property with mining privileges. 7) Provides for the transition from mining privileges to RMA consents. Would like the ORC to retain the same type of privileges as the mining priority has now, in the new RMA water consents. 8) Encourages development opportunity through improved water use and water resource efficiency.	Oppose	Pursuant to section 143(3) of the RMA deemed permits (issued under the Mining Act 1926) expire 1 <sup>st</sup> October 2021

			9) That water consents and use remain the same as at present in the Bannockburn, Lowburn and Mt Pisa areas.		
Cromwell Branch Federated Farmers of New Zealand	58	137	Would like the Council to retain the same type of privileges as the mining priority has now, in the new RMA water consents.		Pursuant to section 143(3) of the RMA deemed permits (issued under the Mining Act 1926) expire 1 <sup>st</sup> October 2021
<b>Submitters name</b>	<b>Submitter number</b>	<b>Reference number</b>	<b>Summary of submission</b>	<b>Support</b>	<b>Reason</b>
Alan Mark	6	137	That a new objective be introduced into the Water Plan: "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."	Support	This gives effect to many of the Council's RMA section 30(1)(c) functions.
Environment Southland	17	13.48	For groundwater and surface water resources that cross the Otago/Southland boundary, Environment Southland requests that ORC give consideration to the effect of the different management regimes and how the Water Conservation (Mataura River) Order 1997 will be given effect to. The ORC may wish to acknowledge the Water Conservation (Mataura River) Order 1997 within the Regional Plan: Water for Otago.	Support	The Upper Mokoreta River is part of protected waters where any discharge must, after reasonable mixing, meet the standards as outlined in clause 7 of the Water Conservation (Mataura River) Order 1997. It is noted that Council could impose higher standards and being a headwater stream, such standards may be more appropriate.
Otago Fish and Game	21	6.39	Support this objective (being 6.3.2A) to maintain long term groundwater levels and water storage in Otago's aquifers.	Support	Implementation of this objective will contribute to the maintenance and enhancement of instream values.
Otago Fish and Game	21	137	Re Section 6.1 (Introduction) Wish to see rules and objectives linking quantity and quality to protect and enhance waterways. Prohibit further water abstraction for activities	Support	This gives effect to many of the Council's RMA section 30(1)(c) functions.



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			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.		
Otago Fish and Game	21	137	Objective 6.3.1 could read: "To retain and reinstate flows in rivers sufficient to maintain their life-supporting capacity for aquatic ecosystems, and their natural character."	Support	This gives effects to several RMA section 6 and 7 matters
Otago Conservation Board	31	137	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.	Support	This gives effects to several RMA section 6 and 7 matters
Public Health South	39	137	That there should be further controls over land use in the area of drinking water supply catchments (community drinking water supplies).	Support	This gives effect to many of the Council's RMA section 30(1)(c) functions.
Federated Farmers of New Zealand (Inc)	42	18	Re Policy 6.4.10A- Supports the allocation of groundwater and specifying maximum annual volumes that can be taken from a groundwater resource. Policy must ensure that where possible limits are set for specific groundwater resources and where they are set, that existing users are considered as part of the annual allocation.	Support	This gives effect to provisions in the National Environmental Standard on Ecological Flows and Water Levels.
Central Otago District Council	50	8.42	Re Policies 6.4.0 & 9.4.3- Include details of determination of hydrological characteristics (including length of measurement).	Support	This gives effect to the provisions in the Proposed National Environmental Standard for Water Measuring Devices

