

**From:** [Phil Driver](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 to the LWRP Submission  
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While I congratulate all stakeholders on many elements of Plan Change 7, the river flows and allocations outlined in this Plan Change do not reflect a consensus view of the OTOP Zone Committee.

Therefore Plan Change 7 must remove any statements that imply that Plan Change 7 was based on a community consensus through the OTOP Zone Committee.

Specifically, a significant number of OTOP Zone Committee members requested that their objections to these flow and allocation levels be documented in the Zone Implementation Plan Addendum. These objections were based on the fact that the flow and allocation regimes gave 1<sup>st</sup> order priority to economic factors in total contradiction to the Canterbury Water Management Strategy that gives 1<sup>st</sup> order priority to environmental, cultural and social uses of water. Despite these objections, flows and allocations in Plan Change 7 are based largely on the recommendations from OTOP Zone flow and allocation working parties that were dominated by water abstractors and so did not reflect the preferences of the wider community or of the OTOP Zone Committee as a whole.

Consequently under Plan Change 7, rivers like the Temuka will remain over-allocated for at least a decade with consequent adverse impacts on cultural, environmental and social factors. This is completely unacceptable.

Plan Change 7 therefore needs to be improved to create ecologically, culturally and socially healthy flows in all rivers in the catchment.

Yours sincerely,

Dr Phil Driver, in my personal capacity while declaring that I am a member of the OTOP Zone Committee and member of the Regional Committee of the CWMS

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