

From: [Nigel Davenport](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 Submission from Aoraki Development
Date: Friday, 13 September 2019 11:47:34 AM
Attachments: [image002.png](#)
[Plan Change 7 Aoraki Development Submission Sept 2019.pdf](#)

Kia ora,

Our submission attached

Nga mihi,

Nigel

Nigel Davenport
Kaiwhakahaere Matua / Chief Executive



Economic Development Agency for the Timaru District

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Submission on the Proposed Plan Change 7 to the Canterbury Land & Water Regional Plan

To Environment Canterbury

Introduction

1. Aoraki Development thank Environment Canterbury for the opportunity to submit on the Plan Change 7.
2. This submission is made by Aoraki Development 2c Sefton Street East, Timaru
3. The contact person is **Nigel Davenport, Chief Executive Officer** who can be contacted at Aoraki Development, phone (03) 687 2682, nigel@orakidevelopment.co.nz or PO Box 560, Timaru 7940.
4. Aoraki Development is the Economic Development Agency for the Timaru District and is a 100% owned Council Controlled Operation (CCO) of Timaru District Council.
5. Aoraki Development is a member of Economic Development New Zealand (EDNZ) which is a national not for profit that empowers and enables individuals and organisations either practicing, or associated with, economic development across New Zealand.
6. Aoraki Development could not gain an advantage in trade competition through this submission.
7. Aoraki Development wishes to be heard in support of this submission.
8. Aoraki Development would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

Preface

9. Aoraki Development prefaces its submission by making the following comments:
 - a. As an economic development agency, the growth and prosperity of the people and community of the Timaru District, and indirectly the wider Central South Island, is at the centre of all we do.

- b. This is in full alignment with the Governments Living Standards Framework, Local Governments Wellbeing Standards and encapsulates the true meaning of as Inclusive Growth ethos being ***“that every member of a community has the equal opportunity to contribute to and benefit from inclusive prosperity”***.

Proposed Plan 7 Changes

10. Aoraki Development supports the need for a sustainable approach to water resources, nutrient management and land use now and into the future, with due consideration of the impacts and opportunities associated with three key areas – namely environmental, social and economic.
11. However, as warrants a topic of this importance, we do not believe the three key areas have been fully investigated and assessed to the extent needed.
12. In our view, there appears to be a disconnect between what the ecological requirements of the zones waterways are, and the minimum flow regimes and water quality outcomes specified in PC7. It is our understanding, for example, that the Step 2 increases in minimum flows of the Opihi tributaries and mainstem are beyond what is actually required to protect instream habitat, and in some cases the increase is actually detrimental to some freshwater species.
13. Furthermore, the economic impacts and opportunities associated with the proposed Plan Change 7, appear to have been assessed only very late in the process (to the extent that they did not inform the OTOZ Zone Committee’s recommendations), and even then, have been given only cursory consideration.
14. The “flow down” impacts on individual farmers through to business and industry of the proposed minimum flow regimes, nutrient management and land use requirements, within the proposed Plan Change 7, are anticipated to be significant but need to be better understood by all concerned.
15. It is anticipated operational structures, costs and efficiencies will all be impacted. Compliance costs, stocking and cropping levels, debt structures and ongoing profitability and viability being an example of these.
16. The fact that many associated parties themselves are having to individually complete this critical work, in most cases at speed given tight submission deadlines, is of grave concern.
17. Surely a collaborative approach to extensive assessment of these key environmental, social and economic considerations should have been facilitated and driven by ECAN. Work that involved comprehensive and structured engagement with affected parties over an appropriate, not rushed, timeframe.
18. In the absence of any clear direction in this regard, we are left to assume the accelerated timeframes associated with the proposed Plan Change 7 are an attempt to have them notified before the pending repeal of the ECAN Act at the next full democratic election. A stance, in our view, that has resulted in undue haste being attributed to this very important topic.

Opuha Water/ Opuha Environmental Flow Release Advisory Group

19. Opuha Dam is a South Canterbury success story testament to the energies and dogged determination of an initial group of visionary businessmen, farmers and associated entities.
20. The ongoing prudent management of this significant asset by Opuha Water Ltd (OWL) continues to provide significant and wide-spread economic and social benefits across the diverse primary and industry sectors in South Canterbury and indeed the wider community as a whole.
21. The associated Opuha Environmental Flow Release Advisory Group (OEFrag) is a cross sector collaborative group with significant knowledge and experience build up over many years.
22. OEFrag is an established entity that in our view needs to be retained with a recognised management or advisory role going forward – especially during short water periods.
23. For completeness, Aoraki Development wish to record our full support of the Plan 7 Change submission made by Opuha Water Ltd.

SUMMARY

24. Aoraki Development seek the following decisions by Environment Canterbury:
 - a. there seems to have been a focus on the quantity of consultation that has occurred rather than quality, therefore there is a need to extend consultation on Proposed Plan Change 7 to more fully understand the impacts and effects across the three key environmental social and economic areas.
 - b. engage appropriately skilled and industry accepted professionals to undertake more detailed assessment and analysis of these areas and facilitate full engagement with affected parties through expert caucusing prior to the Hearing.
 - c. amend Plan Change 7 to acknowledge, maintain, and utilise the skills and knowledge of already established cross-sector entities such as OEFrag in all considerations and ongoing management of Plan 7 Change outcomes - once fully assessed and agreed.

We thank you for consideration of our submission and advise we are available on request to discuss further as needed.



9th September 2019

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 Nigel Davenport
 Chief Executive
 Aoraki Development