

[Redacted]

**From:** Otago Regional Council <notifications@engagementhq.com>  
**Sent:** Monday, 4 May 2020 1:29 pm  
**To:** [Redacted]  
**Subject:** Anonymous User completed Submission Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water

Anonymous User just submitted the survey 'Submission Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water' with the responses below.

**Full name of submitter**

J Simon Webb

**Name of organisation (if applicable)**

J R Webb & Sons Ltd

**Email**

[Redacted]

**Postal Address (or alternative method of contact)**

[Redacted]

**Phone number**

[Redacted]

**Do you wish to be heard in support of your submission?**

*(Being 'heard' means speaking at a hearing)*

Yes

**If others have made a similar submission, would you consider presenting a joint case with them at a hearing?**

Yes

**Could you gain an advantage in trade competition from this submission?**

No

**Are you directly affected by an effect of the plan change that:**

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition

I am

**State what your submission relates to and if you support, oppose, or want it amended:**

*(e.g. support rule 'x', or amend policy 'y')*

Oppose PC7

**State what decision you want the Otago Regional Council to make:**

*(e.g. amend policy 'y' to say....)*

To Reject PC7

**Give reasons for the decision you want made:**

*(e.g. I want policy 'y' changed because...)*

J R Webb and Sons Ltd is a fruit growing business on the outskirts of Cromwell. Historically the land was irrigated by the Westmoreland Water Race which took its water supply from Parkburn and Lowburn streams on the Pisa Range. J R Webb and Sons Ltd has since the mid 1950's always had a backup water supply from Lake Dunstan (previously the Clutha River). After consulting with the ORC and water stake holders in the district in 2015 we relinquished or sold our shareholding in the Westmoreland water race and focused on the Lake Dunstan permit (97623). The Lake Dunstan permit is a deemed permit and was reissued in 1998. It will expire in October 2021. Therefore, PC7 will significantly impact us. While abandoning the historical water race (1860's) was sad, it gave other stakeholders a better chance of securing water consents and their future, while taking into account the environment and minimum flows that may have been required when renewing their consents. Our current water right comes from Lake Dunstan which has a bountiful supply of water compared to the small stream hill water the orchard previously relied on. Taking water from this water right has a negligible effect on the environment. Without this water the orchard which my family has farmed for over 100 years would be uneconomic. Over the years the business has contributed greatly to the local and national economies, while producing healthy environmentally sustainable produce. Since the winter of 2017 J R Webb and Sons Ltd has invested on an adjacent piece of land (28 Hectares) that it has leased for 30 years. Up until now we have developed 21 Ha of this land and are planning on developing the last 7 Ha in 2024. Before progressing with this development, we sought advice from the ORC who verbally guaranteed we could easily renew our lake water right for both these properties. Thus, it gave us the confidence in the good faith of the ORC to make this substantial investment into our future and that of the economy. All of our existing infrastructure is effective and efficient. It would all comply with the aqualinc models that the ORC invested in and recommended that we follow. This development has taken abandoned, rabbit infested dry farmland and turned it into a productive orchard that in just 3 years already supports 6 full time staff and 10 seasonal staff, with increasing employment in the future as the development matures. We have also invested heavily in staff accommodation, packing infrastructure, plant and equipment to support this new development. We believe that implementing PC7 will have the effect of stopping improvements in water use efficiency, as the replacement water permits are only short term. It will also stop infrastructure upgrades as you need long term certainty to be able justify this expenditure to your business and to your lenders. There is great expense to the permit holders in renewing consents. We believe that by putting 6 year permits in place, this will put a greater burden financially on permit holders. We have acted in good faith and invested in efficient irrigation methods, paid consultants to undertake scientific work and prepare our consent applications. It would be great if the ORC could have also acted in good faith and allowed us to complete our consent in the framework they initially outlined. It seems flawed to base future usage on past actual usage. Not all metering has been accurate as there has been trouble being able to obtain timely maintenance these monitoring systems. Due to climatic variations there can also be large seasonal variations in water usage. The current average water usage in PC7 will not incorporate extremes that our area is subject to, as it only encompasses 5 years of water recordings and no scientific data of water usage

on an orchard. Much development has happened since 2017 and PC7 disadvantages those people who have already invested time, energy, finances and business progress since 2017 in those developments. To apply usage retrospectively is unfair and the ORC have not acted in good faith in doing this. We have only been using our water {Permit 97623}, (as a main scheme) since 2015 and have been using considerably more since developing the new lease block. This was done while consulting with the ORC to achieve the renewal of our water right for both properties. Future development should be allowed if it has economic and social benefits and no adverse effects on the environment. We also question why all catchments should be treated the same? Taking water from a major river is going to have little environmental impact when compared to a mountain stream. PC7 applies a 'one-size-fits-all' approach across all of Otago. I would like to see more robust science behind this.