

[Redacted]

**From:** Otago Regional Council <notifications@engagementhq.com>  
**Sent:** Wednesday, 15 April 2020 1:07 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**

Robert Stanley Perriam

**Name of organisation (if applicable)**

Wakefield Estates Limited

**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')*

I am currently hold a share in a deemed permit water take off Mt Pisa range. Our family installed the original water race for our water permit 100 years ago for gold mining and some pastoral/domestic use and I strongly feel our historic rights are being striped form us. I therefore oppose this plan change and our concerns with the conditions of this rule are that:

- 6 years is not long enough to ensure investment certainty
- Efficiency improvements will likely not be able to be undertaken in a such a short time frame but efficiency is expected as a matter of control
- The level of information required is still substantial and a significant cost for only short term gain
- There is no allowance for issues with the 2012-17 abstraction record so permit holders will be significantly disadvantaged if they didn't have a meter in that whole time, or it wasn't recording accurately, or wasn't used for a season due to upgrades etc
- We have significant concerns with the specific methodology proposed for "averaging" the rate, daily, monthly and annual volume of take. The few example cases we have run for some existing clients indicate a range of impact from very little right up to more than 30% reduction in monthly and annual volumes.
- The restriction to the 2017-18 irrigation area does not allow for specific on-farm factors that may have affected that years irrigation area. Nor does it allow for expansion that could result in efficiency gains.
- Any rates, volumes and irrigation areas limited by this Plan Change could also become a "line in the sand" in the future Land & Water Regional Plan.
- Requirements to reduce the annual volume has limited direct impact on the in stream environment compared with rate of take
- Some waterways will need a residual or minimum flow and this doesn't allow for that for the next 6 years

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

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

I would like to see new water take permits issued for 35 years terms where there is clear evidence provided that affects on other parties is minimal. There should be plenty of allowance for new irrigable areas within new permit limits. I also want the ORC to review their rules around bore takes around Lake Dunstan. The current rues within 100 meters of the Lake are appropriate to land that is 250 - 300 meters from the shore in some areas and the rules outside 100 meters are too restrictive.

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

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

There is a lot of time and money spent into preparing our water right renewal process. I view this process is only protecting what we already have and protecting the many years of investment into the land this water currently irrigates. Our farming systems are virtually worthless on our fertile land without water in a 350 mm rainfall area. We are prepared to make further investment into more efficient irrigation systems but the cost is high and I need a 35 year consent to justify the investment and gain an acceptable return under acceptable risks. I also have a bore take renewal happening at the same time. This bore has been in place for past 20 years and clearly takes from the Lake Dunstan Aquifer. Our family had no ability to take ground water until after Lake Dunstan was created and raised the underground water source in abundance. Our bore site is located outside 100 meters from Lake Dunstan with ORC rules choosing not to consider these facts and instead try to prove our ground water must be from some other limited source.