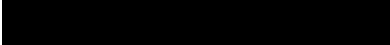


From: Otago Regional Council <notifications@engagementhq.com>
Sent: Thursday, 23 April 2020 3:52 pm
To: 
Subject: Anonymous User completed Submission Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water

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

Malcolm James Little

Name of organisation (if applicable)

Layard Estates Ltd. The Little Orchard Trust

Email



Postal Address (or alternative method of contact)



Phone number



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

(Being 'heard' means speaking at a hearing)

No

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 not

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

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

We want the Proposed water permits plan change (Plan Change 7) to the Regional Plan :Water to be amended

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

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

Amend the policy to will basis allocation on actual water use over the five year period from 2012-2017 for pastoral farming and for horticultural properties over the five year period 2015 - 2020 with the allocation adjusted to take account of the required water useage to produce a commercial crop where: 1) recent horticultural development (redevelopment and new) has resulted in reduced or no water use history over this period. 2) there have been changes to horticultural best practices

Give reasons for the decision you want made:

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

We are a group of five orchards and one vineyard covering 30ha that own water permits under Layard Estates Ltd and The Little Orchard Trust. Richard Saunders (GM Regulatory) has been good enough to visit to see first hand our operation and discuss the issues here in commenting we have valid concerns. For ourselves and others in similar circumstances I want the policy changed as this blanket policy gives no consideration to recent horticultural development and the differences in water use between Agriculture and Horticulture most likely due to lack of internal knowledge and/or fact finding. These being: 1) our water permits are for irrigation and frost fighting. Frost fighting has gravitated to wind machines in the past 10 years but recent 'freeze' frosts (Oct 18) resulted in the loss of \$millions and we have re introduction the more fool prove over head sprinkler systems but they have no recent water use history for this. A recent Hort Research study has indicated frost damage to tree trunks and subsequent bacterial disease can be reduced by guards and under tree sprinkler activation in frost events (water reduces the frost by 1-2 degrees) Accordingly while we have spent funds and have the water allocations we have no water use history. 2) as inspected by Richard Saunders we have been redeveloping 80% of the orchards over the past 7-8 years with a much reduced water useage as a result For some blocks there has been a two-three year fallowing period and / or waiting time for cherry trees. Once again there is a significance difference between the recent water use data and what normally would have been used if a fully mature orchard and going to be required. 3) Orchards irrigate from Oct to May and frost fight in autumn, winter and spring in contrast to pastoral so the data history being used should reflect this as well as the above There will be others that have recently gone ahead with Horticulture developments/redevelopments under the encouragement of this government and the green movement that have water rights but have not used them at all or much reduced The investment per litre of water used in Horticulture is over 10 x that of pastoral farming and produces a great deal more food per litre. Trees are unlikely to survive in Cromwell let alone produce a crop without irrigation and frost protection. If consideration is not given to the above factors it will result in grave consequences for those that have got on board the call for more environmently friendly horticulture and it will very much effect existing and future horticultural production in the region Regards Malcolm Little