

[Redacted]

From: Otago Regional Council <notifications@engagementhq.com>
Sent: Monday, 4 May 2020 4:59 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

Raymond Alexander Gunn

Name of organisation (if applicable)

Family farm trading as Stonehaven 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)

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

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 strongly oppose the implementation of PC 7.

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

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

I wish to see PC 7 withdrawn for the following reasons.

Give reasons for the decision you want made:

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

Background -- Our mainly High Country sheep and beef breeding farm has two Deemed permits up for renewal. One is 21 Ha and the other 10 Ha, and both are part of separate water user groups. This irrigation is extremely important for us to grow winter feed (hay and baleage) and crops for wintering stock when they have to come down off the higher country. Our aim over the last few years has been to change all irrigation from flood to K-Line with some storage capacity. This has provided us with a very efficient low waste scheme, but has come with a considerable cost in infrastructure and water meters for ORC data collection.

1. 6 year term is unfair and too short, when significant amounts of money have been spent on infrastructure, consultants, and data collection which has all been done in good faith. and now the rules are being changed completely.
2. Unfair to use only one season 2017/18 for the total area that can be irrigated, as the changes to the way irrigation is applied means water is used more efficiently and could cover a larger area. This too has been done in good faith, with the expense of new infrastructure to provide a better economic and environmental outcome.
3. Rate of take volume limits based on 2012-17 average monthly maximums is again unfair. We have an average rainfall of 560mm (can range from 450-650mm), with at times large variations between monthly rainfall in any one season. This means in a very dry month we could have crop failure or severely reduced yields because of a yearly average maximum being used which is set too low.