

**From:** Otago Regional Council <notifications@engagementhq.com>  
**Sent:** Monday, 4 May 2020 10:02 am  
**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**

Mark Naismith

**Name of organisation (if applicable)**

Akarua Ltd

**Email**

vineyard@akarua.com

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

210 Cairnmuir Rd, Bannockburn, Central Otago 9384

**Phone number**

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**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 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')*

Our submission relates to Plan Change 7 in its entirety. We oppose Plan Change 7 in its entirety.

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

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

Amend policy

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

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

See attached

**Please attach any additional information.**



**AKARUA**  
CENTRAL OTAGO

**Akarua Ltd**

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**ORC plan Change 7:  
Akarua Ltd - Submission**  
May 4, 2020

To: Otago Regional Council  
[policy@orc.govt.nz](mailto:policy@orc.govt.nz)

**Name of submitter: Akarua Ltd**

Contact persons:

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**A. Introduction.**

Akarua Ltd strongly opposes the plan change 7.

Akarua is an established family business that has grown to operate six individual vineyards across two sub-regions of the Cromwell Basin encompassing 130 Ha's of planted vineyards. Not only do we contribute to the local community and economy our efforts support people and business both Nationally and Internationally.

This submission outlines the reasons that Akarua Ltd opposes the proposed changes.

Akarua Ltd also requests that it be invited to submit in person at any hearings that are held.

In addition, given the severe impacts of COVID-driven policies and market impacts on our business Akarua Ltd also requests a 12 month delay in proceedings, so that we can generate the resources required to fully work through all the issues and impacts that we face.

## **B. Reasons that Akarua Ltd opposes the plan change 7**

### **1. The Plan does not recognise specific catchment characters.**

The national policy statement on freshwater states that water allocation should be approached on a catchment by catchment basis. Each catchment in Otago is unique and a blanket policy fails to take into consideration these unique characters. With multiple rivers, ecosystems, surrounding flora and fauna, and other factors, to apply a blanket approach is to ensure suboptimal outcomes as few of our areas are 'average' in character.

### **2. The plan does not recognise recent water use**

By only looking at average data from 2012 to 2017 irrigation seasons, the plan change fails to recognise the most recent irrigation seasons. Those who have undertaken development in the previous two seasons (2018/19 and 2019/20) will not have this investment recognised. Much of this investment is into newer technologies that have much greater water use efficiency.

With digital recording of the most recent data there should be no hindrance to including this data in the application to granting new water permits.

By choosing to ignore the most recent data, the plan is effectively, by choice of data set choosing to reduce the effective amount of water from the present levels. It would be more transparent, and also a better measure, to use present measures and, if reduction is required, to justify that reduction.

### **3. The plan will grandfather benefits to those who may have mismanaged water**

By solely looking at water volume through a metering device, it fails to recognise what that water was used for. Those that were judicious and only took what was required at the time may now be disadvantaged by those who took advantage of using over allocated volumes of water.

### **4. The plan ignores crop type and end water use**

The water use allocated to a property should be based on what the needs are for the crop grown balanced with the environmental requirements of the catchment.

This broad brush approach does not show any relationship to the environmental impact of the different crops and farming methods, used by the different water users. This is a shift in the 'goal posts' of what many water user groups were working towards

### **5. The plan reverses previous communications.**

The plan change 7 proposal disregards the work that has been completed to date by water users in working towards renewal of deemed permits. The council had asked up until recently for catchment groups to work together to gather the data on their respective catchments– hydrology, water use type and fish studies, this work is now irrelevant to the process of plan change 7 and is viewed as a waste of time, energy and money by those involved

### **6. The plan is too short in nature**

The investment in vineyards is a long-term investment, with little or no short term payoffs. Vines have a useful life of 30 years+. Specifically, all of our viticulture investments look well beyond 6 years. Vines do not crop for the first 3 seasons and generally we would not consider our vineyards to reach a peak in quality production until 15-20yrs of age. Not having security of water over a longer term will disadvantage many vineyard operations.

**7. The plan creates greater uncertainty for businesses and will stifle investment, growth and jobs.**

The short-term nature of consents and the disregard for recent developments will create anxiety and stress amongst many water users who are unable to plan for long term investments.

A system of continually changing short term regulatory conditions is out of cadence with the nature of viticulture - which is one of our major concerns. To make effective business decisions, long-term certainty is required. Unless this certainty is offered, on-going and further investment will be stifled.

**C. Request to delay**

Given the COVID-driven impacts, and regulatory restrictions on our business, as well as financial pressures, we request a 12 month delay to the process.

**D. Request to appear in person**

Akarua Ltd requests to appear in person at any hearings held.

**Sincerely,**

Akarua Ltd