

**Submission on Proposed Water Permits Plan Change (Plan Change 7)  
to the Regional Plan: Water for Otago**  
(Form 5, Clause 6 of the First Schedule, Resource Management Act 1991)

**Form 5**

**Submission on publicly notified proposal for policy statement or plan**

*Clause 6 of First Schedule, Resource Management Act 1991*

To: Otago Regional Council  
policy@orc.govt.nz

Name of submitter: **Grape Vision Limited**

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*This is a submission on the following proposed plan change:*

Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water for Otago.

We could not gain an advantage in trade competition through this submission.

We are 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.

The specific provisions of the proposal that our submission relates to and the decisions we seek from Council are as detailed on the following pages.

We wish to be heard in support of our submission.

If others made a similar submission, we **will** consider presenting a joint case with them at a hearing.

Signature of submitter: ..... Date: .....

 2/5/20

# Introduction and Overview

1. This submission is made by Grape Vision Limited (“Grape Vision”). Grape Vision is a vineyard development, management and consultancy based in the Cromwell Basin who works on vineyards from Wanaka to the Gibbston, the Cromwell basin and Alexandra (collectively described in this document as the Winegrowing region of Central Otago and as such represents vineyard and winery clients who are water users across Central Otago. Grape Vision was established in 1996 and currently manages over 275 hectares of vineyards in the Winegrowing Region of Central Otago.

## Submission on PC7

2. Our submission relates to PC7 in its entirety.
3. We oppose PC7 in its entirety.
4. PC7 is a document intended to address the consequences of inept management and inadequate governance at the Otago Regional Council (ORC). The inability of the ORC to appropriately address the complexities and requirements dictated by the government imposed requirements of re-permitting deemed permits before the imposed period has necessitated the need for PC7. Alternative solutions, including the appointment of a government appointed commissioner to take control of the ORC and through proper planning and governance create an appropriate solution to the challenges presented by this process have not been properly considered and they should be. An interim extension of all permits to enable the necessary changes to occur at the ORC is an alternative that should be properly explored and would provide water users with the opportunity to contribute to achieving the objectives of efficient and effective water use.
5. PC7 and how its being applied is not based on any robust science or analysis of catchments and how they are allocated or managed. The imposition of a one size fits all approach will inevitably lead to inequitable outcomes and will not achieve effective or efficient water use.
6. Using an average of data from the 2012 to 2017 seasons fails to consider recent irrigation seasons. These seasons will not provide sufficient data to enable extremes of climate to be considered nor will this range of seasons enable any

impacts of longer term climate change to be included. Data from the period suggested is also likely be less accurate with more recent data, particularly that using electronic monitoring equipment, from being considered.

7. PC7 does not properly consider existing crop type and the end water use. The broad brush approach used does not properly consider the relationship between the environmental impact of what the water is being used for and how efficient its use is. It also does not consider the potential for changing land use and the positive impact this may have on water use.
8. The permit period proposed is too short and will not enable the continued development of land to be continued, as there will be increased risk to development of land with such a short permit period. This is an abrogation of the right to farm land in addition.
9. This will stifle investment in the development of land and in particular investment in the more efficient use of water as the permit period is too short.
10. The manner in which the non-complying activity rule appears to being imposed appears to create a very difficult pathway, or more accurately a barrier to obtain a longer term permit. There needs to be a more balanced pathway to achieving long term permits which enables a more balanced application of the rules.
11. We have worked assiduously for a number of years to prepare, in good faith, applications for the extension of permits. Data has been collected and reports prepared in the terms of the operative framework. To change, ad hoc with minor consultation, in the manner PC7 proposes is in bad faith and inequitable and will not resolve the underlying issues. It is ill considered and needs to take a more sophisticated approach to solving the issues. The burden appears to be falling on water users as a result of organisation incompetence at the ORC.