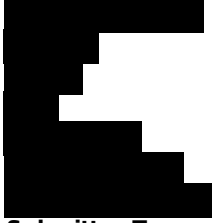


# ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 85

B J Graham trust no1 (ben graham)



**Submitter Type:** Not specified

**Source:** Email

**Overall Notes:**

**Clause**

Are you a trade competitor?

**Position**

I am a person who would not gain an advantage in trade competition through this submission

**Notes**

**Clause**

What are you submitting on? You can submit on specific parts of Plan Change 8 or the whole plan change.

**Position**

I am submitting on specific parts of the plan change (please detail below).

**Notes**

**Clause**

What is your view on the Plan Change 8 or the specific parts listed above? Please select one, if you have multiple views state clearly in the notes box below.

**Position**

Oppose

**Notes**

**Clause**

What decision would you like the Environment Court to make?

**Position**

Approve the plan change with amendments

**Notes**

**Clause**

Do you wish to be heard in support of your submission? All submissions will be considered by the Environment Court. Please indicate if you wish to be heard in support of your submission.

**Position**

I wish to be heard in support of my submission

**Notes**

**Clause**

Please indicate your choice(s) below. If you do not indicate your intention to call experts, you can change your mind later and decide to call experts to give evidence in relation to your submission, provided you do so in time to meet any procedural direction the Environment Court might make.

**Position 1**

I intend to call an expert witness

**Position 2**

If others make a similar submission I/we would consider presenting a joint case with them at a hearing

**Notes**

**Clause**

Authority to act:

**Position**

I confirm I have the authority to sign this submission on behalf of the submitter

**Notes**

# SUBMISSION FORM

6 July 2020

## Otago Regional Council Omnibus Plan Change - Plan Change 8 (Water Quality) to the Regional Plan: Water for Otago

This form is for making submissions on a change the Otago Regional Council (ORC) has prepared for the Regional Plan: Water for Otago. This plan change is one of two comprising the Omnibus Plan Changes (also known as the Water Quality Plan Change). The Omnibus Plan Change has been called in by the Minister for the Environment under section 142(2) of the Resource Management Act 1991 (RMA).

Plan Change 8 proposes to introduce a range of amendments targeting specific issues or activities known to be contributing to water quality issues in parts of Otago.

NB: Please use a **separate form** if you wish to make a submission on the other part of the Omnibus Plan Change - Plan Change 1 (Dust suppressants and landfills) to the Regional Plan: Waste for Otago.

**This submission form includes guidance to aid the submitter. For more information on Plan Change 8, please refer to the Public Notice or further information on the EPA website:**

[www.epa.govt.nz/ORCplanchanges](http://www.epa.govt.nz/ORCplanchanges).

### Where to get help preparing your submission

If you have any queries about making a submission or the plan change itself please contact the EPA by phone on 0800 401 673 or by email at [ORCplanchanges@epa.govt.nz](mailto:ORCplanchanges@epa.govt.nz).

### How to make a submission

Your submission on Plan Change 8 must be received no later than **5pm on Monday, 17 August 2020**.

**You must also send a copy of your submission on Plan Change 8 to the ORC when you make a submission.**

Submissions on Plan Change 8 can be made by either:

1. Using the online submission form on the EPA website under [www.epa.govt.nz/ORCplanchanges](http://www.epa.govt.nz/ORCplanchanges)  
**All submissions made online will automatically be forwarded to the applicant and the form includes a space to upload any supporting documents;**

OR

2. Filling out this form and:

- a. Emailing it and any supporting information to [ORCplanchanges@epa.govt.nz](mailto:ORCplanchanges@epa.govt.nz) (if smaller than 10 MB) with the following subject line: Submission [Your Name] ORC Plan Change (Omnibus); OR
- b. Posting it and any supporting information to: Environmental Protection Authority, ORC Proposed Plan Changes, Private Bag 63002, Wellington 6140; OR
- c. Delivering it in person to the Environmental Protection Authority office on Level 10/215 Lambton Quay.

Submissions made on this form must be forwarded to ORC by either:

1. Emailing it and any supporting information to [policy@orc.govt.nz](mailto:policy@orc.govt.nz) (if smaller than 10 MB) with the following subject line: Submission [Your Name] ORC Plan Change (Omnibus);
2. Posting it and any supporting information to Otago Regional Council (attention Rachel Currie), Private Bag 1954, Dunedin 9054
3. Delivering it in person to Otago Regional Council (attention Rachel Currie), at any of the Otago Regional Council office:
  - Alexandra (William Fraser Building, Dunorling Street),
  - Dunedin (70 Stafford Street); or
  - Queenstown (Terrace Junction, 1092 Frankton Road).

## Privacy statement

The personal information you provide on this form will be held by the EPA, 215 Lambton Quay, Wellington. It will be used by the EPA for the purpose of administering the public consultation aspects of the Omnibus Plan Change. Copies of your full submission will be provided to the Environment Court and the ORC, and your address for service may also be provided to other parties in the process. Other than your name, your personal contact information in Part A of this form will not be published on the EPA website.

Your name, the information in Part B of this form, and any attached information will be published on the EPA website, and made available to the Environment Court, the ORC and the public for use in the processing and consideration of the proposed WPPC.

By completing this submission form, you give the EPA permission to use the information for the purpose stated above. You have the right to access and correct personal information held by the EPA. All information held by the EPA is subject to the Official Information Act 1982. Note: If the submitter is a company, full business contact details will be published on the website.

## Notes about your submission

Please note, your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission or (part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it is supported only by evidence that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert evidence on the matter:
- it contains offensive language.

# Part A

## Submitter details

<b>Name of organisation (if relevant):</b>	B J Graham trust no1		
<b>Title:</b>	Mr Mrs Miss Ms Dr Other: <i>(Please tick the appropriate title)</i>		
<b>First name of submitter:</b>	ben	<b>Surname of submitter:</b>	graham
<b>First name of contact person (if different to above):</b>		<b>Surname of contact person (if different to above):</b>	
<b>Home Ph:</b>		<b>Work Ph:</b>	
<b>Mobile:</b>	██████████		
<b>Email address for service:</b>	████████████████████		
<b>Postal Address (or alternative address for service):</b>	████████████████████ ██████████ ██████████	<b>Postcode:</b>	██████

# Part B

Submitter Name: ben graham

This is a submission on a matter in relation to which the Minister for the Environment made a direction under section 142(2) of the Resource Management Act 1991. The matter is **Water Plan Change 8**, part of the Omnibus Plan Change prepared by the Otago Regional Council.

***If you require additional space for any question(s) please attach further documents or paper to this submission form and clearly state your name and the question(s) you are expanding on.***

## Are you a trade competitor?

***Please select the appropriate option.***

I am <b>not a person who could gain an advantage in trade competition</b> through this submission yes	I am <b>a person who would gain an advantage in trade competition</b> through this submission and am directly affected by an effect of the plan change that adversely affects the environment and does not relate to trade competition or the effects of trade competition
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## What are you submitting on?

*You can submit on specific parts of Water Plan Change 8 or the whole plan change.*

I am submitting on the <b>whole of Plan Change 8</b>	I am submitting on <b>specific parts of Plan Change 8</b> (please detail below) yes
<b>The specific parts of the matter that my submission relates to are:</b>	
Part d intensive grazing Part e stock exclusion Part a nutrient allocation	

## What is your view on Plan Change 8 or the specific parts listed above?

Please select one, if you have multiple views state clearly in the comments box below.

Support	Neutral	Oppose yes
<b>The reasons for my view(s) are:</b>		
<p>Intensive grazing part d</p> <p>I oppose the following proposed intensive grazing rules – 100ha or 10% of land holding</p> <p>I also oppose the 10m vegetative strip between grazing area and water body</p> <p>We farm Hartfield which is a 3500 ha extensive hill property at the northern end of the Taieri ridge. 160ha irrigated 3340 extensive dry land hill country</p> <p>We winter 6200 merino ewes ,3300 merino hoggets ,240 angus cows , 220 angus calves and 50 r2 angus cattle , our property has a closed herd policy ,no brought in stock apart from sires[ rams and bulls]</p> <p>Hot dry summers and cold winters 450mm rainfall</p> <p>We have no grass growth from may until mid September</p> <p>Large amounts of silage / balage /hay are made in the spring /summer months</p> <p>We also rely on large areas of brassica / beet to get our young stock through the winter and from august on we feed our ewes on crop up to lambing</p> <p>The rule states 100ha or 10% of land holding of brassica crop . This rule is unfair.</p> <p>We need large areas of crop due to very low rainfall [400 mm] our crops can really struggle ,</p> <p>Having enough area in crop lets us “spell” the rest of our property for 5 weeks or so ,which lets those extensive areas recover for the ewes to go onto for lambing .</p> <p>We have no pugging issues ,</p> <p>I would ask the environment court to remove the 100ha rule</p> <p>Stock exclusion part e</p> <p>We all would like improved water quality ,</p> <p>The blanket rules do not consider the stocking rates and the terrain of central otago</p> <p>Where my property is intensive ie irrigated areas where cattle are intensively grazed there is a reticulated water scheme and the cattle are excluded from water bodies .</p> <p>The rest of our property relies on dams and small creeks ,the creeks often are dry before they hit the Taieri river in summer. ( no irrigation takes on these creeks)</p> <p>I oppose the blanket rule for all cattle exclusion from all 1 metre wide water ways ,on our property our angus cows are spread far and wide ( one cow per 14ha)</p> <p>It would be impossible to fence these water ways.</p> <p>A Reticulated water scheme on extensive dry hill country like this would be a horrendous cost .if even possible</p> <p>I support sheep not being included in these rules ,</p> <p>Nutrient allocation</p> <p>Part a nutrient allocation policy 7d6 and part c policy 7d6</p> <p>Grandparenting nitrogen supports the polluters and ties the non polluters down , otago regional council needs to do the scientific work and modeling to make specific rules for the different areas in otago ,</p>		



### What decision would you like the Environment Court to make?

Approve Plan Change 8	Approve Plan Change 8with amendments yes	Decline Plan Change 8
<b>The reasons for my view and/or any amendments I am seeking are:</b>		
<p><b>Remove the 100ha brassica rule for reasons ive stated above</b></p> <p><b>Remove the blanket rule of all cattle exclusion from 1m waterways our stocking rate is so low cattle have no effect</b></p> <p><b>Remove nutrient allocation part a 7d6 ORC needs to do the scientific modelling</b></p>		

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

All submissions will be considered by the Environment Court.

*Please indicate if you wish to heard in support of your submission*

**I do not wish to be heard in support of my submission** no

**I wish to be heard in support of my submission**

If others make a similar submission, I will consider presenting a joint case with them at the hearing

I intend to call an expert witness(es)

*(If you do not tick this box, you can change your mind later and decide to call experts to give evidence in relation to your submission, provided you do so in time to meet any procedural direction the Environment Court might make)*

## Authority to Act

**I confirm that I have authority to sign this submission on behalf of the submitter**

**Signature:** Ben Graham **Date:** 17/08/20