

ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 66

Vanessa Hore, **Blackstone Hill Ltd (Ben and Vanessa Hore)**



Submitter Type: Not specified

Source: Web Form

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

The specific parts of the plan change that my submission relates to are:

Notes

7.D.6 14.6.1.1(a); (b); (c); (d)

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

The reason(s) for my views are:

Notes

7.D.6- Consents granted should be for the same duration as the interim plan so everyone is on a level playing field come time for reassessment (if some operations have consents that will last into the term of the new plan it puts other operations at a disadvantage when/if new limits are set) 14.6.1.1 - Crops to be grazed in winter 2021 are being planted now so rules that will be in force then, must be set well in advance to allow sufficient time to prepare and/or make alternative plans if changes to farming systems are required. - Generic rules that are effective in high rainfall areas are overly restrictive in low rainfall areas There are people going hungry - not only in the world but in our own country. Inhibiting the ability of farmers to produce affordable food products is only going to make this problem worse. (a) - Placing blanket limitations on a hectare basis penalises larger operations - especially those located in drier areas with shorter growing seasons where it is an absolute necessity to carry stock food into the winter in crop form - Encourages more intensification of cropping land (to get more yield off a smaller area); and more nutrient input into these crops- is this not likely to achieve the opposite of the intention of this rule? - No differentiation between summer/autumn grazed crops and winter crops - No differentiation between irrigated and dryland crops - Sheep are included in this rule but excluded in other rules - the environmental impact of sheep is considerably less than cattle or deer so they shouldn't be included here (b) We are located in Central Otago - a known low rainfall area with free-draining soil. There are multiple shallow depressions or swales that will only ever have water in them in an absolutely extreme weather event (1 in 20+ years) so to be precluded from utilising these areas in a normal farming operation is completely nonsensical (c) There are instances when grazing a crop from top to bottom is simply not practical and to place a blanket rule on farmers operations is unnecessary and ridiculous - it should be a guideline not a rule (d) The vegetative strip should be related to topography and

slope not a blanket rule. Another point to note here is crops are not just used for feed, they are part of a weed control programme during pasture renewal; if weeds cannot be effectively controlled more herbicides may be required and pastures may not be as persistent due to weed invasion

Clause

What decision would you like the Environment Court to make?

Position

Approve the plan change with amendments

Notes

Clause

The reasons form my view and/or any amendment(s) I am seeking are:

Notes

As explained above We would also like to note the time frame provided for feedback on the plan is too tight and restrictive for adequate consideration when there is so much turmoil in everyone's lives at the moment. We also feel farmers are unjustly thought of as not caring for the environment - there may be a few bad apples but the vast majority of us have environment in the forefront of decision making as without our environmental resources flourishing our businesses aren't viable.

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

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