

ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 63

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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

Part C Good Farming practices Part D - Intensive Grazing Part E - Stock access to water,

Clause

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

Notes

Part C Rule 7.D.9 (b) (i) - Progressively exclude stock from lakes, wetlands, and continually flowing rivers, this rule should be removed in favor of ii which is outcomes based The outcome is covered in (ii). avoid significant adverse effects on water quality, bed and bank integrity and stability. This rule is also not consistent with National Stock exclusion rules. National stock exclusion rules already progressively remove deer, cattle and pigs from rivers lake beds and wetlands. The wetland boundary also needs to be redefined to be fit for purpose because the current was not designed for stock exclusion purposes. Part D Intensive Grazing - The definition of Intensive grazing is incorrect. Intensive Grazing is defined by the number of stock/ha or stock units/ha. Grazing intensity (animals/ha/day) = Stocking Rate (animals/ha) X Rotation Length (days). 14.6 Rural land uses 12.6.1.1 (a) 100 ha rule needs to be removed because • there is no clear positive environmental outcome from restricting the owners of large farms (over 1000 ha) to 100 ha of cropping. • Having to get a consent for this practice would only cost time and money with no clear environmental gain • It also incentives larger landowners to grown significantly higher yields on smaller areas which will increase the kg/N lost/ha during grazing of these areas. • Where moisture is the most limiting factor through dryland areas of Central Otago farmers will grow larger areas of crops that will yield much lower 2-6 t DM/ha. This means that larger areas are required with very little environmental impact compared to high yielding crops over 20t/ha. This is where the definition of intensive grazing in Plan Change 8 is flawed. 14.6.1.1 (b) Agree with consent conditions to grown crops in critical source areas, but the definition of critical source areas is too broad and misses reference to soil type 14.6.1.1 (c&d) Agree with these clauses Part E - Stock Access to Water 13.5.1.8A - agree with these rules because they are based on outcomes 13.5.1.8A - These rules are not consistent with the NPSFW for exsisting fencelines. Rules should also be linked to stocking rate and a Wetland Management plan as described above.

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

This plan change is not consistent with law (NPSFW, NES, and National Stock exclusion rules). Many of the rules that apply to me are not consistent with the outcomes they aim to achieve, this means that there are likely many other rules do not apply to me that are the same. These rules will add significant cost to rural communities with no or very little gain for the environment

Clause

What decision would you like the Environment Court to make?

Position

Decline the plan change

Notes

The timing and inconsistency with national law means that this has imposed significant time burden on people affected. There is also the confusion with submissions being emailed having to be sent to two different email addresses. I believe this process has not been made easy to get the view of all those affected as it should be in a true democratic process.

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