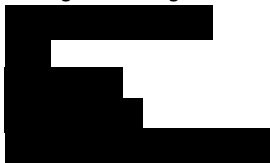


ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 53

Georgie McGregor, DD McGregor Ltd (Duncan and Georgie McGregor)



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

Part A: Policy 7.D.6 AND Part C: Policy 7.D.9 (b) (i) AND Part D: Rule 14.6 Definition Intensive Grazing

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

Reasons for my view Part A: Policy 7.D.6 We oppose this policy. We seek that the 'grandparenting' approach to regulation and standards be abolished, and that high intensity systems that have high nitrate leaching rates are required to make more of a reduction, while low intensity systems are given flexibility to change farming systems in order to be future proofed. Extensive farming systems need to be encouraged and they need to remain financially viable. Make the regulation proportionate to risk. A one size fit all policy will not work. Policy 7.D.9 (b) (i) There needs to be a lot more clarification and some very clear definition as to what this policy does and doesn't allow. We are concerned that the proposal mentions 'stock'. Is this all stock including sheep? The cost to build a sheep proof fence is likely around the \$18 per metre whereas a cattle proof fence around \$6 per metre so there is a significant difference in cost. It is also much easier to put a 2 wire fence in more difficult terrain (although some terrain impossible) than a netting fence that would be required to keep our sheep out of the creeks. We believe our sheep have very little impact if any on the water quality of our property and are happy to drink the water to prove it. The topography of our property means that fencing of some of the water bodies within our property is near to impossible. Many of our creeks have high rocky bluffs above them, meaning that not only can stock not get to them easily but there is no way that they can be safely and sensibly fenced. Our property has 16 creeks and all except for 1 of these creeks has at least 1 stockwater dam on them, so while the creeks don't run wider than 1m the dams do. All off those creeks dry up in an average summer however the dams remain with water in them. It is very important that no changes are made to include intermittent flowing rivers. If this was to be the case then we would be required to fence a minimum on 45km of creeks and ponds which would be a cost between \$270,000 and upwards of \$830,000. These costs would put us out of farming. Rule 14.6 Reasons for my view We oppose this policy. Being a dryland extensive farm we plant crops for summer and winter grazing. We believe our

grazing crops are low impact. We already have a natural buffer between cultivated areas and waterways, caused by the contour, rocks and gullies of native tussock. It is a benefit for us to leave the tussock in the gullies as it creates shelter for our animals. There is no way that we could cultivate these areas. The contour and rock outcrops on our property mean that even when a paddock is cultivated to its full potential, there is still a large area left away from the cropped area for animals to camp and graze on. We choose only to have our sheep on our crops and we shift break fencing every 3 days meaning that there is not a small area of feed available therefore intensifying the area being grazed at one time. Pugging is not an issue on our property. The proposed rules would mean we would not be a permitted activity because of the area that we have as deemed intensive grazing on our property. Because of the climate in which we farm and the fact we don't have irrigation, we need to plant crops to not only rest the farm for the winter months but also to give us a buffer for the summer months. Seed strike of these crops is very much dictated by the weather and means we have to plant perhaps more area than we would should we be under irrigation, to ensure if we have a poorer crop yield that we have enough feed for our stock. We know that we can demonstrate quite clearly that our activity which would be deemed as intensive grazing would be compliant by use of a farm plan. Having to do this by way of a resource consent will be another unnecessary cost to us. As part of our everyday farm management we have extensive records of types and areas of cultivation, crops types, nutrient input etc and have a farm plan. Again, this proposed policy is disproportionate to the risk. 10% of an extensively farmed property of 1320ha is significantly different that 10% of an intensively run 200ha property where chances are land topography also means natural buffers to waterways are less likely to exist. We need to plant more than 100ha per year of combined winter crops in order to feed our 4200 stock units on our 1300ha property.

Clause

What decision would you like the Environment Court to make?

Position

Decline the plan change

Notes

Part A: Policy 7.D.6 Decline the plan change. We support farmers having a tailored land and environment plan specific to their farm. We would like to see recognition and support of an industry-led farm assurance scheme through the use of Land and Environment/Farm Plans. Please adopt an approach which provides flexibility and the room to adapt and change land uses for low intensity, farming systems. Policy 7.D.9 (b) (i) Decline the plan change. Delete or amend this policy. Allow the use of a LEP/Farm plan to sensibly identify the vulnerable areas on a property that require fencing, rather than a blanket rule over all land types. Rule 14.6 Decline the plan change. If it is adopted, provide more clarify on the definition and exclude summer grazing crops. Instead, support farmers having a tailored land and environment plan specific to their farm. Please adopt an approach which provides flexibility and the room to adapt and change land uses for low intensity, farming systems. Talk to the farmers.

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