

# ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 96

M F & D A DOWLING (NICOLE DOWLING)



**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

Decline the plan change

### 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

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**

[REDACTED]

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**From:** Nicole Dowling [REDACTED]  
**Sent:** Monday, 17 August 2020 3:32 pm  
**To:** ORCplanchanges  
**Subject:** Submission (Nicole Dowling) ORC Plan Change (Omnibus)  
**Attachments:** Submission\_Form\_Omnibus\_Plan\_Change\_8 N. Dowling.docx

To whom it may concern,

Please see attached my submission on behalf of M F & D A DOWLING.

Regards,

[REDACTED]

# 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>	M F & D A DOWLING		
<b>Title:</b>	Mr Mrs Miss Ms Dr Other: MR <i>(Please tick the appropriate title)</i>		
<b>First name of submitter:</b>	NICOLE	<b>Surname of submitter:</b>	DOWLING
<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: \_\_\_\_\_ **NICOLE DOWLING** \_\_\_\_\_

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>	
<b>14.6.1.1 A The total cumulative area of intensive grazing is less than 100ha or 10%</b>  <b>Policy 7.D.6 Nitrogen grandparenting for high emitters</b>  <b>Intensive grazing definition</b>	



## 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 OPPOSE
<b>The reasons for my view(s) are:</b>		
<p><b>14.6.1.1 Our farm is a 2000ha sheep and beef property in the Maniototo of Central Otago. I am 23 years old and plan to take the farm on in the coming years. Our family have owned and successfully run 'Eden Creek' since 1903 and that doesn't happen without taking care of the soil and water it comprises.</b></p> <p><b>I oppose this proposal as our farm requires over 100ha of crop pre year to bridge the feed deficit that occurs in winter and summer due to our harsh Central Otago climate. With grass growth non- existent over winter due to cold conditions (usually May- August but sometimes longer) when animal demand is highest, crops such as kale, swedes and rape are grown. We prefer to grow these lower yielding, lower input crops compared to crops such as fodder beet as they yield less, meaning more paddocks are put into crop, meaning animals are at a lower stocking density, resulting in less pugging, and minimal animal welfare issues. I oppose that summer crops such as rape or raphno should be included in the intensive grazing definition as they do not promote the same issues that winter grazing has the potential to. Currently rape is the predominant summer crop grown on our farm, used as a high quality forage for fattening lambs on as grass does not provide ample quantity or quality at the peak of summer, particularly in a commonly occurring drought. I understand that we would be able to apply for consent and continue growing over 100 ha of crop if it were granted, however I do not think this should be necessary in this low rainfall, extensive environment.</b></p> <p><b>Policy 7.D.6 This rule is backwards and therefore I oppose it. It takes a major tool out of the toolbox for low N using farmers, yet stifles necessary innovation required from high N using farmers who've come to rely on it. As a Certified Nutrient Management Advisor I understand better than most the role Nitrogen plays in pastoral farming system. For a farm such as ours, N has hardly been used in the past and this will remain in the future. However having it as a tool to pull the spring shoulder of the growing season forward, or push the autumn shoulder of the season back is essential to, again, bridging the feed deficit that a biological farming system inevitably contains at certain times of year, particularly in a harsh climate. At the end of the day, nitrogen is still an essential nutrient to a you, me, plants, and livestock.... penalising low use farmers is going to withhold good farmers getting optimal performance from their pastures and therefore the finer edge on their business.</b></p> <p><b>Intensive grazing Definition: This definition should only account for crops grazed in winter. Crops grazed in summer do not create the same pugging and erosion issues due to the soil generally being below field capacity. Many farms still need to grow forage crops in the summer to provide adequate quantity and quality of feed due to grass growth slowing because of hot, dry conditions, however if the proposed rule goes ahead this would mean underfed animals or de-stocking- neither of which are a positive outcome for the farmer in terms of animal welfare or profitability of the business.</b></p>		

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

Approve Plan Change 8	Approve Plan Change 8with amendments	Decline Plan Change 8 DECLINE
<b>The reasons for my view and/or any amendments I am seeking are:</b>		

**14.6.1.1 Delete or amend this policy. It is not practicle for extensive, dryland areas such as Central Otago, and having to apply for a consent is a costly exercise in both monetary and time value. Also, do not include crops which are grazed in the summer as part of the 10% or 100ha as these do not bare nearly as much environmental risk.**

**By amending this proposed policy, less farmers will be driven towards growing heavier yielding, higher input crops which are more detrimental to soil and waterway health.**

**Policy 7.D.6. Delete this policy. Council needs to undertake scientific, economic and social analysis to understand the complication this would cause to rural communities. Farmers need to be involved in the planning process so that council have at least some basic understanding and perspective. Allow different N use farmers to discuss why they use N, why they use it when they do, what this allows them to do in terms of pasture management, and what it would mean if they had to reduce.**

**Intensive Grazing Definition: Do not include summer grazed forage crops in this definition. They are a critical strategy to bridge the feed gap and rarely result in soil or water health issues due to the climate and soil moisture capacity at that time of year.**

## 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*

<b>I do not wish to be heard in support of my submission</b>	<b>I wish to be heard in support of my submission</b> YES If others make a similar submission, I will consider presenting a joint case with them at the hearing YES I intend to call an expert witness(es) <i>(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)</i>
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## Authority to Act

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

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

