

ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 26

Lambhill Station (Chris Thomson)



Submitter Type: Not specified

Source: Email

Overall Notes:

Clause

Are you a trade competitor?

Position

I am a person who would gain an advantage in trade competition through this submission.

Notes

YES

Clause

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

Notes

see submission

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

Authority to act:

Position

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

Notes

[REDACTED]

From: Lamb Hill Station [REDACTED] >
Sent: Friday, 14 August 2020 2:34 pm
To: policy@orc.govt.nz; ORCplanchanges
Subject: EPA ORC Plan Changes Submission Form from Chris Thomson with signed Authority to Act
Attachments: Submission Form Omnibus Plan Change_8 (1) (3) 2020.pdf; Omnibus Plan Change Plan Change_8.Authority to Act signature.pdf
Importance: High

To whom it may concern,

Please find attached my submission for the:

Otago Regional Council Omnibus Plan Change – Plan Change 8 (Water Quality) to the Regional Plan: Water for Otago – submission.

One attachment is my submission, the second is a scanned copy of my signature (page 8) to this submission – please keep them together.

Warm regards
Chris Thomson
Lambhill Station

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.

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.

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
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 (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 (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

Name of organisation (if relevant):	Lambhill Station, Lancaster Trust		
Title:	Mr Mrs Miss Ms Dr Other: Mr <i>(Please tick the appropriate title)</i>		
First name of submitter:	Chris	Surname of submitter:	Thomson
First name of contact person (if different to above):		Surname of contact person (if different to above):	
Home Ph:	██████████	Work Ph:	██████████
Mobile:			
Email address for service:	██		
Postal Address (or alternative address for service):	Lambhill Station ██ ██████ ██████████	Postcode:	██████

Part B

Submitter Name: Chris Thomson

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 not a person who could gain an advantage in trade competition through this submission YES	I am a person who would gain an advantage in trade competition 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 whole of Plan Change 8	I am submitting on specific parts of Plan Change 8 (please detail below) YES
The specific parts of the matter that my submission relates to are:	
7.D.9.(b) (i) Progressively exclude stock from lakes, wetlands, and continually flowing rivers". 14.6.1.1 The use of land for intensive grazing is a <i>permitted</i> activity providing: (a) The total cumulative area of the landholding used for intensive grazing is the lesser of: (i) 100 hectares; or (ii) 10% of the total cumulative area of the landholding.	

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
The reasons for my view(s) are:		
<p>Currently there appears to be a 'blanket' approach in the broad sense toward land use changes which fails to take into account the large variation of the topography of Otago, which measures approximated 32,000 square kilometres and under the elected governance of the Otago Regional Council (ORC). For example: Lambhill Station is in an area which on average has an annual rainfall of approximately a 650mm, as such run off, mud, and/or pugging very rarely arises. Predominantly our seasonal forage crops are at a minimum equal to or greater than 500 meters from any major water course. The topography of Lambhill Station is 'table-top', as such our 'flat' paddocks are at the top of the farm with steep hill country on either side. As such our cropped/cultivated paddocks have large tussock faces/gullies on their perimeter and within their boundaries which filters and reduces any runoff were it to occur (this is extremely rare under our average rainfall and being that no major water source flows beside cropped land). The ORC had been water testing the 3 O'clock Stream (which splits the property in two) for a number of years whilst under our current farm management cropping programme and test results showed the stream to be very clean. Most of our crops are sown via a direct drill with minimal ground disturbance, this also reduces the risk of runoff. The test results demonstrate that our current farming practices are cohesive with ensuring sound sustainable environment requirements enabling the enjoyment inherent to past and for future generations (including our children's) to enjoy.</p> <p>Lambhill Station is 4560ha and within that area we do not have one individual stock grazing paddock that would be entirely equal to or less than a 10° slope. Currently 200-300ha of forage crops is direct drilled annually on a parcel of this farm land. Under this policy 14.6.11(a)(i)(ii) we will be required to apply for two consents which will add extra expense and require substantial time to initiate and follow up to ensure it processed effectively to meet seasonal weather requirements (as the seasons and weather dictate our ability to cultivate) adding time pressure, stress and anxiety to an already difficult job in these financially uncertain and difficult times.</p> <p>In our isolated, difficult to access, location at Lambhill we need to grow seasonal forage crops for our stock. Contractors are unable to readily access the property to create supplementary feed and our short growing season along with our high risk of drought does not enable us to ensure enough growth to make supplementary feed such as hay/silage. The cropping system we currently use increases the soil organic matter, improves soil structure, thus the water holding capacity.</p> <p>Within Plan Change 8 – 7.D.9.(b) (i) which state: 'Progressively exclude stock from lakes, wetlands, and continually flowing rivers". As stated previously, Lambhill Station has waterways at the base of native and tussock block country which include the 3 O'clock Stream, Christmas Creek and Taieri River with the latter two on the boundary. Due to its topography this country has a very low stocking rate, eg 2su/ha of sheep and cattle. Also due to the steep topography of these areas it would be impossible to fence an 'exclusion zone' without fencing along the tops of hills thus excluding stock from hundreds of hectares of grazing land. This would put the financial viability of the property at risk along with creating areas for feral animals to reside and damage the landscape along with making the land a haven for invasive weeds eg: gorse and broom that can then damage water ecology and choke waterways creating the risk of erosion during adverse weather events which in turn distributes these 'long life' seeds of weeds further down the catchment. In addition the farming and grazing of this land has been done for numerous decades with no adverse effects on water quality.</p> <p>Finally we at Lambhill Station take immense pride in knowing our waterways are not compromised and that NZers can continue come to the water's edge to camp and swim in our waterways along with neighbours and staff with their children.</p>		

What decision would you like the Environment Court to make?

Approve Plan Change 8	Approve Plan Change 8 with amendments	Decline Plan Change 8 Yes
The reasons for my view and/or any amendments I am seeking are:		
<p>I agree that there is a need to ensure waterways are protected for future generations. I suggest that consultation with farmers be the approach rather than implement these strict rules with a blanket approach.</p> <p>My suggested solution for both 7.D.9.(b) (i) & 14.6.1.1:</p> <p>To add:</p> <p>7.D.9.(b) (i) re-word ‘...progressively exclude intensively grazed stock from historic data determined high risk lakes...’ unless mitigation measures can be provided</p> <p>14.6.1.1 – remove as is a blanket approach and unrealistic to Otago’s topography and will result an immense economic cost to farmer, regional council and NZ’s economy.</p> <p>Avoid a ‘One Rule For All’ approach to this policy. There are so many different farming types and environments eg: dairy, sheep and beef (dryland and irrigated) within the ORC catchment. Make individual farmer relative to their farming type, climate and environment; accountable for their parcel of land eg: annual water testing, buffer zones to continuous running water sources for crop areas.</p> <p>Provide the ORC information in a timely manner of areas. This could be done by the ORC creating a template that is emailed to individual farms that requires the following information:</p> <ul style="list-style-type: none"> • area to be cropped • type of crop • estimated grazing date • animals to be grazed • time period on crop • fertiliser applied • cultivated or direct drilled • attach bi-annual water test results at autumn and spring • attach farm map highlighting cropped area(s) <p>Most major waterways in the area are already tested and this historic data of water quality will be available to be used as a starting point.</p> <p>If waterways are not meeting required standards, work will need to be implemented to rectify. If it is shown that standards are currently being met then it is the farmer’s responsibility to ensure this remains.</p> <p>We need to monitor/measure water quality regularly to ascertain what (if any) run-off, leaching or polluting is currently occurring.</p> <p>If a farmer can show no problems are occurring from their current farming management system then it is futile to see why the need to impose all these rules/expectations on them.</p> <p>If a farmer is found to be knowingly in breach of polluting waterways or not preventing any degradation then prosecute.</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 be heard in support of your submission

I do not wish to be heard in support of my submission	I wish to be heard in support of my submission 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:** _____

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

I do not wish to be heard in support of my submission	I wish to be heard in support of my submission 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: _____

14/8/2020