

ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 35

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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 Exclusion,

Clause

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

Notes

Part C Good Farming practices Part D - Intensive Grazing Part E - Stock Exclusion,

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

The reasons for my view(s) are: Part C Rule 7.D.9 (b) (i) - Progressively exclude stock from lakes, wetlands, and continually flowing rivers, this rule is not based around a positive outcome. The outcome is covered in (ii). avoid significant adverse effects on water quality, bed and bank integrity and stability. I propose that 7.D.9 (b) (i) be removed this is because negative outcomes are more specifically related to stocking rate and effects (covered in ii) rather than whether 1 cow/ha has access to a high-country lake or continually flowing stream. Stock grazing on the Upper Taieri flood plan can have significant environmental gains by controlling weed grasses and crack willow trees which impact the natural character and hydrology of the river, it is proven by years of water tests (LAWA reference here) that stock with access to this river and tributary streams at a low stocking rate can have none of the adverse effects mentioned in 7.D.9 (b) (ii). Grazing these areas also improves public access to a world renowned trout fishery. The Wetland Boundary for the Upper Taieri River in the Maniototo was developed many years ago with no intention of stock being excluded. Areas must be redefined as part of the Wetland Management Plan consulting with all stakeholders as part of the Upper Taieri Water Resource Management Group. 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 it is not a direct result of the crop being grazed because brassica yields can range significantly depending on climatic conditions and subspecies. This definition needs to be corrected using a proven scientific equation such as Grazing intensity (animals/ha/day) = Stocking Rate (animals/ha) X Rotation Length (days). 14.6 Rural land uses Brassica Crops are widely used in Otago to provide high quality feed for livestock during times of feed shortage. This can be summer and winter. Brassica crops are a cost effective and sustainable way to provide a break crop in a pasture renewal program. They allow farmers to control noxious weeds and raise fertility of the

paddock. The life time of pasture means that up to 10% of a farm will be put into brassicas each year as part of this process. Issues around brassica crops can be • Kg of N lost/ha through urine of grazing high yielding brassica crops and fodderbeet • Soil damage and sediment loss from grazing high yielding crops on high risk soils or near water ways. • Animal health implications from grazing animals on heavy wet soils 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 incentivises 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 meanst that larger areas are required with very little environmental impact compared to high yielding crops over 20t/ha. This is where the definition of impensive grazin in Plan Change 8 is flawed. 14.6.1.1 (b) Agree with consent conditions to grown crops in critical source areas, but critical sorce areas needs redefined while it could cover sediment runoff it is open to interperatation, ability of achieving the desired outcome with this rule are unclear. It does not reference soil type, soil type has a large baring on the kg of Nitrogen lost to groundwater and the damage that could be done with heavy livestock. 14.6.1.1 (c&d) Agree with these clauses 14.6.2.1 With regard to suggestions above discretionary activity needs altered. 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 consistant with the NPSFW for exsisting fencelines. Rules should also be linked to stocking rate and a Wetland Management plan as described above.

Clause

What decision would you like the Environment Court to make?

Position

Decline the plan change

Notes**Clause**

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

Notes

The reasons for my view and/or any amendments I am seeking are: I have only submitted on the parts of PC 8 that directly effect the sustainability of our business with no clear positive environmental and social gains. The tone, clauses and definitions are telling that it has been written with no regard to correct scientific terminology or triple bottom line objectives. Many rules have no baring on the outcomes that it aims to achieve. It creates unnecessary compliance costs for farmers and our Regional Council is not equipped to enforce these rules. I have real concern for the state of the environment in Otago because of the lack of focus on environmental outcomes

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