

# ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 33

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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

Proposed Plan Change 8, Page 41. 14.6 Rural Land Uses. Page 43. Intensive Grazing. Means grazing of stock on forage crops (including brassicas, beet and root vegetable crops), excluding pasture and cereal crops. Page 33 7.D.9 Enable farming activities while reducing their adverse environmental effects by: (a) Promoting the implementation of good management practices (or better) to reduce sediment and contaminant loss to water bodies; and (b) Managing stock access to water bodies to: (i) Progressively exclude stock from lakes, wetlands, and continually flowing rivers; and (ii) Avoid significant adverse effects on water quality, bed and bank integrity and stability, Kai Tahu values, and river and riparian ecosystems and habitats; and (c) Setting minimum standards for intensive grazing; and (d) Managing the risk of sediment run off from farming activities by: (i) Implementing setbacks from water bodies and establishing riparian margins, and (ii) Limiting areas and duration of exposed soil; and (e) Promoting the identification and management of critical source areas within individual properties, to reduce the risk of nutrient or microbial contamination and sediment run-off. Page 47, 13.5 13.5.1.8A (b) From 2022: (i) All dairy Cattle and pigs are excluded from the beds of lakes, continually flowing rivers wider than 1 metre and Regionally Significant Wetlands; and (ii) where stock are excluded under (i), a setback of five metres from the beds of lakes, continually flowing rivers wider than 1 metre and Regionally Significant Wetlands is implemented.

### Clause

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

### Notes

Proposed Plan Change 8, Page 41. 14.6 Rural Land Use 14.6.1 The use of land for intensive grazing is a permitted 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 cumulative area of the landholding. (b) there is no intensive grazing in any critical source area; and (c) Stock is progressively grazed (break-fed or block-fed) from the top of a slope to the bottom of a slope; and (d) A vegetated strip of at least 10 metres maintained between the intensively grazed area and any water body, and all stock are excluded from this strip during intensive grazing. Page 43. Intensive Grazing. Means grazing of stock on forage crops (including brassicas, beet and root vegetable crops), excluding pasture and cereal crops. Page 33 7.D.9 Enable farming activities while reducing their adverse environmental effects by: (a) Promoting the implementation of good management practices (or better) to reduce sediment and contaminant loss to water bodies; and (b) Managing stock access to water bodies to: (i) Progressively exclude stock from lakes, wetlands, and continually flowing rivers; and (ii) Avoid significant adverse effects on water quality, bed and bank integrity and stability, Kai Tahu values, and river and riparian ecosystems and habitats; and (c) Setting minimum standards for intensive grazing; and (d) Managing the risk of sediment run off from farming activities by: (i) Implementing setbacks from water bodies and establishing riparian margins, and (ii) Limiting areas and duration of exposed soil; and (e) Promoting the identification and management of critical source areas within individual properties, to reduce the risk of nutrient or microbial contamination and sediment run-off. Page 47, 13.5 13.5.1.8A (b) From 2022: (i) All dairy Cattle and pigs are excluded from the beds of lakes, continually flowing rivers wider than 1 metre and Regionally Significant Wetlands; and (ii) where stock are excluded under (i), a setback of five metres from the beds of lakes, continually flowing rivers wider than 1 metre and Regionally Significant Wetlands is implemented.

**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**

While I support the objectives of the plan, it is over-prescriptive and too reliant on popular opinions and evidence derived from different environments to those to which this plan will apply. It needs some modification to allow for local solutions and particular needs at catchment level.

**Clause**

The reason(s) for my views are:

**Notes**

Page 41, 14.6.1: In this rule, disqualification as a permitted activity is triggered by any one of the listed conditions. Condition (a) is unreasonable in the context of extensive land use as it exists in the drier parts of the Otago Region. Properties in these parts commonly exceed 2000 - 3000 hectares in order to support economically viable stock numbers. In this environment, it is common that stock is grazed on forage crops (including brassicas, beet and root vegetable crops) on areas far exceeding 100 hectares. These crops are low yielding, on low slope land, well outside critical source areas and distant from any water body, yet by these criteria, this land use would be defined as "intensive grazing". This land-use poses no risk to water quality and has a long history as a sustainable practice. It should remain a permitted activity. Page 33 7.D.9 (b) (i) Progressively exclude stock from lakes, wetlands, and continually flowing rivers This clause implies an extension of stock exclusion over time without regard to possible effects. Page 47 13.5.1.8A (b) From 2022: Stock exclusion from Regionally Significant Wetlands The boundaries to the Upper Taieri wetlands were established well before any consideration was given to the possibility of stock exclusion, and they are not well-positioned for that purpose. In a recent submission on this topic to the proposed Plan Change 7 on behalf of the Upper Taieri Water Management Group, the point was made that stock exclusion from that area would create unintended problems from uncontrolled exotic grass species and other weeds. Apart from the damage to indigenous flora, this would diminish aesthetic and recreational values.

**Clause**

What decision would you like the Environment Court to make?

**Position**

Approve the plan change with amendments

**Notes****Clause**

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

**Notes**

"Intensive grazing" is a term well used and defined in agricultural science. It is derived from production and stocking rate factors, divided by area. This formula is equally appropriate for estimating the probability of resulting environmental effects. While I understand the origin of the perception that brassica and root crops are associated with nutrient leaching through their common use in high slope and in high rainfall areas, that association must be qualified by other considerations. The definition by plant species is simply wrong. I submit that the definition of "intensive Grazing" (Page 43) should be amended to take account of crop volume (tonnes per hectare) which is also a common definition made by farmers for feed budgeting purposes, or stocking rate (animals per hectare) which is also fairly obvious to an experienced observer. Either of these measures or the use of both would be reasonable. Stock Exclusion is not always wise in an environment which includes exotic plant species. I submit that clause 7.D.9 (b) (i) Progressively exclude stock from lakes, wetlands, and continually flowing rivers be deleted to give precedence to the following clause (b) (ii) which requires the avoidance of adverse effects. Because existing wetland boundaries were not established with stock exclusion in mind, and are well out of position for that purpose, I further submit that - 13.5.1.8A (b) From 2022: (i) All dairy cattle and pigs are excluded from the beds of lakes, continually flowing rivers wider than 1 metre and Regionally Significant Wetlands; and (ii) where stock are excluded under (i), a setback of five metres from the beds of lakes, continually flowing rivers wider than 1 metre and Regionally Significant Wetlands is implemented. - be amended to provide that the setback from Regionally Significant Wetlands may be positioned in accordance with an approved wetland management plan.

**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**