

ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 74

Douglas Reid



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

Approve the plan change with amendments

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

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):			
Title:	X Mr Mrs Miss Ms Dr Other: <i>(Please tick the appropriate title)</i>		
First name of submitter:	Douglas	Surname of submitter:	Reid
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):	██ ██████████	Postcode:	██████

Part B

Submitter Name: Douglas Reid

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.

<p>I am not a person who could gain an advantage in trade competition through this submission <input checked="" type="checkbox"/></p>	<p>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</p>
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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.

<p>I am submitting on the whole of Plan Change 8</p>	<p>I am submitting on specific parts of Plan Change 8 (please detail below) <input checked="" type="checkbox"/></p>
<p>The specific parts of the matter that my submission relates to are:</p>	
<p>Part A –</p> <ul style="list-style-type: none"> - 7.D.5 The ongoing reduction of adverse environmental effects of the discharge - 7.D.6 iv expected reduction in nitrogen <p>Part D-</p> <ul style="list-style-type: none"> - 14.6.1 no intensive grazing of critical source areas - Stock are progressively breakfed from the top of a slope, down - No grazing of critical source areas, the majority of otago hill country has steep mature grass gullys - Glossary, intensive grazing includes forage crops including brassicas and root vegetables and excluding pasture and cereals <p>Part F-</p> <ul style="list-style-type: none"> - Stock must be excluded from sediment traps (this should not include sheep as they don't wade in water like cattle pigs and deer, they soley drink from the waters edge, no bank erosion) 	

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 <input checked="" type="checkbox"/>
The reasons for my view(s) are:		
<p>Part A –</p> <ul style="list-style-type: none"> - Oppose P.C 7.D.5 - there is no lower number or % provided, this is unreasonable to ask of farmers - Oppose P.C 7.D.6 iv - grandparenting of N limits un reasonable to ask of many farmers that are all ready leaching very small amounts, it does not address the land holders that are actually doing the damage with high discharge, there for grandparenting scheame needs to be ditched and utilize a taired system instead) <p>Part D-</p> <ul style="list-style-type: none"> - Oppose P.C 14.6.1 needs excemption for when it is the only available shelter for livestock eg, hill country farms where they most often need to utilize the head of a gully, farmers will find they are in breach of animal rights otherwise and this amendment will have miniamal effect on nutrient and sediment run off - Oppose Stock grazed from top to bottom - a lot of hill country paddocks can only have vehicle access from the top, where this is the case they often need to graze from the bottom up wards to maintain that access in winter driving conditions, this is able to be done while still being able to maintain the 10 meter buffer at the bottom - Oppose no grazing of critical source areas- the majority of otago hill country has steep mature grass gullys (critical source areas) within its winter cropped paddocks, if they are not intensively grazed before the paddock is re sown in pasture the grazing area is significantly diminished whilst in its first year of pasture, this needs amended to allow this to be grazed By sheep only, up to 1 month before re sowing (a good compromise for both partys) - Oppose P.C Glossary, intensive grazing includes forage crops including brassicas and root vegetables and excluding pasture and cereals (crops of multi species are now recommended by agronomists, and brassicas are used in pasture mixes through out otago. <p>Part F- Oppose P.C</p> <ul style="list-style-type: none"> - this should not include sheep as they don't wade in water like cattle pigs and deer, they soley drink from the waters edge, no bank erosion) 		

What decision would you like the Environment Court to make?

Approve Plan Change 8	Approve Plan Change 8 with amendments yes	Decline Plan Change 8
The reasons for my view and/or any amendments I am seeking are:		
<p>To many oversights that havnt been though through enough, the basic plan has merit but it needs the following amendments to stop it making land not appropriate for the majority of land holders</p> <p>Part A – Change all listed P.C’s</p> <ul style="list-style-type: none"> - 7.D.5 – consult soil and fertilizer experts on realistic lower limits to use and put a lower limit in place. - 7.D.6 iv – do not use grandparenting scheme for nutrient loss. A tared/floored system is required to get the results that the water and environmental plans are put in place for and would provide transparency for the public and much better environmental results <p>Part D- Change all listed P.C’s</p> <ul style="list-style-type: none"> - 14.6.1 – an excemption needs written in for when it is the only available shelter for livestock eg, hill country farms where they most often need to utilize the head of a gully, farmers will find they are in breach of animal rights otherwise - Intead of grazed from top to bottom of slope it should be grazed in a way that limits run off best suited to individual paddocks - the majority of otago hill country has steep mature grass gullys (critical source areas) within its winter cropped paddocks, if they are not intensively grazed before the paddock is re sown in pasture the grazing area is significantly diminished whilst in its first year of pasture, this needs amended to allow this to be grazed up to 1 month before re sowing - the intensive grazing definaition needs an exemption to say if root crop/ cereal/ pasture mixes are used then they are exempt when root crop seed weight % of mix is 10% or under <p>Part F- Change P.C’s</p> <ul style="list-style-type: none"> - be amended to exclude sheep as they don’t pose a risk to erosion and water contamination like other farmed animals 		

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

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) NO
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	<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: _____

Douglas Reid

_____ Date: **16/08/2020** _____