

ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 29

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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

Winter Grazing

Clause

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

Notes

Policy 7.D.9 Rule 14.6.1 Permitted activities - No Resource Consent Required (p41) (a) and (d)

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

Policy 7.D.9 Rule 14.6.1 Permitted activities - No Resource Consent Required (p41) (a) Oppose; and (d) Oppose

Clause

The reason(s) for my views are:

Notes

Rule 14.6.1 (a) I oppose this Rule. The Rule is inconsistent with the National Policy Statement for Freshwater 2020. The ORC's discussion documents state that they used Southland's Proposed Land and Water Plan to set these rules. I believe that the Southland plan is not relevant to our Central Otago climate and soil types. The allowance of 10% of total cumulative area of landholding, does not fit in to the current practice of pasture renewal using winter crops. This would indicate pasture renewal every 10 years which is slower than current practice. Rule 14.6.1 (d) I oppose this Rule. The Rule is inconsistent with the National Policy Statement for Freshwater 2020. I believe that the NES for Freshwater 2020, crop setback from winter grazing crops is sufficient at 5m. The ORC has not given any reasons why Otago should have a deeper setback than other provinces. The ORC (in its discussion documents to Plan Change 8) discussed leaching in a South Otago winter grazing regime. This is irrelevant is any discussion of Central Otago winter grazing. The ORC's own Water Quality Reports (2007-2008 to 2018-2019) report that (with the exception of 2014-2015) The Manuherikia River has consistently been below the ANZECC guidelines for Nitrite-Nitrate Nitrogen (NNN). This measure is a fair indicator of winter grazing practices. I believe that these published results do not justify Winter Grazing Guidelines any stricter than the NES for Freshwater 2020 rules.

Clause

What decision would you like the Environment Court to make?

Position

Approve the plan change with amendments

Notes

Rule 14.6 Intensive Grazing permitted activity and Intensive Grazing definition. Rule 14.6.1 (a); and Rule 14.6.1 (d) The ORC should adopt the Nation Policy Statement for Freshwater 2020 in regard to this Rule.

Clause

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

Notes

There is no exceptional circumstances in Otago that require Winter Grazing Rules which differ from the NES for Freshwater 2020.

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 do not 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

The submitter have elected to withhold their personal details from publication.