

ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 17

Ray Parker, Springwater Ag Limited (Ray Parker)



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

refer submission attached

Clause

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

Notes

refer submission attached

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

refer submission attached

Clause

The reason(s) for my views are:

Notes

refer submission attached

Clause

What decision would you like the Environment Court to make?

Position

Approve the plan change with amendments

Notes

refer submission attached

Clause

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

Notes

refer submission attached

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

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

Springwater Ag Limited (SAL)

ORC Omnibus Plan change 8 submission 13 August 2020

Background

SAL owns and operates a c. 600 cow, 222 ha dairy farm on the Taieri Plain, Otago which will be impacted by the plan change. Consequently, SAL wishes to submit several suggested considerations for the plan change.

Submissions

1. Low Rate effluent application

One area of concern SAL has with the proposed rules is the transition to low rate effluent application and the lack of clarity around what this means. It will be implemented through conditions in a resource consent for discharging effluent to land but there is no reference to any guidance in the rule for this. SAL suggests using the soil risk classification as a basis for deciding how much effluent to apply.

2. Storage and Effluent Ponds

SAL's view is that if the pond meets the requirements of being synthetically lined and having a leak detection system, it should not need to have a drop test completed every three years.

3. Winter Grazing

SAL suggests the winter grazing provisions should align as much as possible with the new national regulations for intensive winter grazing. This would include changing the 10 metre requirement for a vegetated strip between the intensively grazed area and water, to 5 metres. The use of the term 'water body' is not appropriate here and we suggest changing that in line with the national regulations for winter grazing which includes a setback to rivers, lakes, wetlands, and drains.

4. Stock Exclusion

From 2022, all dairy cattle should be excluded from rivers, lakes and regionally significant wetlands and a 5 m setback implemented. The proposed rule does not clarify if existing fences will need to be moved.

SAL suggest the rules should align requirements as much as possible with the new national regulations for stock exclusion. This would for example include changing the definition of dairy cattle to what is used in the national regulations to make the definition easier to understand. SAL also suggests a clarification for existing fences and that they will not have to be moved and that riparian planting also could be accepted as a way of keeping stock out of water.

5. Ability to grant rating relief (including targeted rates relief) to offset costs associated with implementing the plan

SAL has incurred significant rate increase from the ORC over many years as reflected in the following table:

Year	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
ORC - SAL Rate increases																
Rates (net of GST)	7,319	8,315	13,120	12,481	15,256.16	16,621	25,842	28,034	29,349	31,880	34,659	32,760	35,403	37,671	41,305	43,976
Increase		996	4,805	-639	2,775	1,364	9,221	2,192	1,315	2,531	2,779	-1,899	2,643	2,268	3,634	2,671
Percentage increase in rates each year		13.61%	57.78%	-4.87%	22.24%	8.94%	55.48%	8.48%	4.69%	8.62%	8.72%	-5.48%	8.07%	6.41%	9.65%	6.47%
Total percentage increase from 2006 to 2021	500.84%															

The increase in 2012 came from what SAL considers to be an erroneous amendment to the targeted rates scheme, which has unfairly and unjustly penalised SAL. As a result, SAL, while supporting environmental initiatives as proposed by Plan change 8 and other regulation, finds itself increasingly in a worse financial position to implement the changes required. SAL would therefore like provisions in the plan change that would allow the ORC to offer direct rates relief on a case by case basis to offset the cost impost of regulatory change.

Ray Parker

Director

Springwater Ag Limited