

# ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 106

Stonehenge Station (Francine Hore)



**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 the whole plan change.

### 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

Decline the plan change

### Notes

see 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**

**From:** Francine Hore [REDACTED]  
**Sent:** Monday, 17 August 2020 12:29 pm  
**To:** ORCplanchanges  
**Subject:** Re: Online form not working

Hi Michaela

The first question I don't get, we are farmers and the new rule will have effects on our business but nothing to do with trade competition

We oppose the Plan in its current form

We would like to be heard, and would consider being heard as part of a group.

Thanks  
F

On Mon, 17 Aug 2020 at 12:25, ORCplanchanges <[ORCplanchanges@epa.govt.nz](mailto:ORCplanchanges@epa.govt.nz)> wrote:

Hi Frankie

Sorry that the ORC Submission Form was not working for you and thanks for sending the submission below through.

There are a few questions that we require submitters to answer –

1. Are you a trade competitor? (select one)

I am a person who **would not gain** an advantage in trade competition through this submission OR

I am a person who **would gain** an advantage in trade competition through this submission

2. What decision would you like the Environment Court to make? (select one – feel free to add notes)

Approve the plan change

Approve the plan change with amendments

Decline the plan change

3. Do you wish to be heard in support of your submission? (select one)

I do not wish to be heard in support of my submission

I wish to be heard in support of my submission

We will add your answers on to your submission below, please get in touch if you have any other questions.

Kind regards

Michaela Aspell

**ORC Plan Changes Project Team**

Land & Oceans Applications

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**From:** Frankie Hore [mailto:████████████████████]  
**Sent:** Monday, 17 August 2020 11:26 am

**To:** ORCplanchanges <[ORCplanchanges@epa.govt.nz](mailto:ORCplanchanges@epa.govt.nz)>

**Subject:** Online form not working

We oppose the ORCS plan 8 in its current form

We oppose the Winter grazing rule.

Intensive grazing by definition does not mean the type of stock or the plant, it is defined by the stocking rate.

100ha or 10% which is smaller is very punitive to large low stocking rate stations, without providing any environmental gains.

10% of our farm is 1000ha, we need a considerable amount of winter feed for the stock spread across a large station. To constrain our ability to run our farm as a closed system is to grossly effect sustainability of our farming system.

WE propose a change to - The 100ha or 10% whichever is larger and all statements about intensively be based on the station stocking rate (I.e. Animals per Acre).

We oppose the stock exclusion rules and Regionally significant wetland exclusion rules.

The exclusion of stock to be based on the effect that that is having. On our farm our Oversearer leaching rate is 4 and we are stocking at less than a stock unit per acre. Costly punitive rules on our farm that has never failed on water quality are unnecessary.

The requirement to fence in the high country and/or intermittent streams and lakes will be completely cost prohibitive and provide no use to improve the environment. In fact, there would be gross negative environmental consequences to bulldoze the land in order to place fences and fence of scenic lake fronts, on land that in our case is only used for a few weeks in the summer at extremely low stocking rates. These high-country areas would be ruined by the building of water systems for stock water and would drive a requirement to intensify land use to pay for theses changes that are not required for environmental gain.

Regionally significant wetlands, as defined and as yet undefined - The removal of parts of the farm which are in freehold ownership and have had years of rates paid on for farming, will have dire consequences for farmers but also for the ORC in terms of contravening property rights law. If the ORC wants to remove land from farmers, they must purchase that land at market rate, not make this cynical land grab.

We oppose a change to exclusion of stock from high-country streams/ intermittent streams and lakes and wetlands as currently defined and as yet undefined, where there is no degradation being caused

Francine Hore

Stonehenge Station

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sent from [Mail](#) for Windows 10