

# ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 104

Traquair Station (Charles 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 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

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](http://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](mailto: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](http://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](mailto: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](mailto: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

<b>Name of organisation (if relevant):</b>	Traquair Station		
<b>Title:</b>	Mr Mrs Miss Ms Dr Other: Mr <i>(Please tick the appropriate title)</i>		
<b>First name of submitter:</b>	Charles	<b>Surname of submitter:</b>	Reid
<b>First name of contact person (if different to above):</b>		<b>Surname of contact person (if different to above):</b>	
<b>Home Ph:</b>	██████	<b>Work Ph:</b>	
<b>Mobile:</b>	██████████		
<b>Email address for service:</b>	████████████████████		
<b>Postal Address (or alternative address for service):</b>	████████████████████ ██████	<b>Postcode:</b>	████

# Part B

Submitter Name: Charles W 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.***

I am <b>not a person who could gain an advantage in trade competition</b> through this submission I am nott	I am <b>a person who would gain an advantage in trade competition</b> 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
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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.*

I am submitting on the <b>whole of Plan Change 8</b>	I am submitting on <b>specific parts of Plan Change 8</b> (please detail below)
<b>The specific parts of the matter that my submission relates to are:</b>	
Permissable grazing areas, water reticulation, fencing	

## 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 oppose
<b>The reasons for my view(s) are:</b>		
<p>The proposed plan, will effectively lock in policies and expectations. This will make large areas of hill and high country land unviable to farm, because of fencing requirements, fresh water and Nitrogen leaching and slope usage restrictions. All these requirements add more cost to the business resulting, less stock being farm and essentially decreasing the farm's production/viability and in a broader sense the nation's economy.</p> <p>Shep should be exempt from waterway restrictions because they naturally do not congregate in waterways, unlike dairy cattle and dairy beef finishing.</p> <p>Intensive grazing of crops should be allowed to have buffer zones (catchment area), including gullies as the last break, (3 to 7 days only) to enable these areas less noxious weed growth and establishment.</p> <p>Even though we have reticulated water schemes already ( a proposed requirement in this Policy),we are having to now use smaller breaks, which means the use of more temporary water troughs and tanks on trailers because it is not permissible to graze to the gullies.</p> <p>We tend not to use sacrifice paddocks because in the past have found it results in brassica diseases spreading and affecting next year's crops. The temporary fencing onto the tops of ridges and grazing from the top to bottom is at the point of creating an animal welfare issue because there is less shelter.</p>		

## What decision would you like the Environment Court to make?

Approve Plan Change 8	Approve Plan Change 8with amendments YES	Decline Plan Change 8
<b>The reasons for my view and/or any amendments I am seeking are:</b>		
As stated above		



## 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

<p><b>I do not wish to be heard in support of my submission</b> Correct</p>	<p><b>I wish to be heard in support of my submission</b></p> <p>If others make a similar submission, I will consider presenting a joint case with them at the hearing</p> <p>I intend to call an expert witness(es)</p> <p><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></p>
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## Authority to Act

I confirm that I have authority to sign this submission on behalf of the submitter

Signature: Chas w Reid Date: 17-08-2020

# ORC Water Permits Plan Change

**Submission Reference no:** 50

This submission refers to Plan Change 8 and has been processed as such and included with the PC8 submission form made by the same submitter.

**Traquair Station (Charles 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 the plan change 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 matter 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?

**Notes**

see submission

**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**

# SUBMISSION FORM

6 July 2020

## Otago Regional Council Water Permits Plan Change - Plan Change 7 (WPPC)

This form is for making submissions on a change the Otago Regional Council (ORC) has prepared for the Regional Plan: Water for Otago. The Water Permits Plan change (WPPC) has been called in by the Minister for the Environment under section 142(2) of the Resource Management Act 1991 (RMA).

The WPPC includes an objective, policies and rules that manage the replacement of deemed permits (also known as mining privileges) expiring in 2021, and any other water permits expiring prior to 31 December 2025 (the date by which a new Regional Land and Water Plan is expected to be operative). The plan change also introduces a new policy regarding the duration of new water permits.

**This submission form includes guidance to aid the submitter. For more information on the WPPC please refer to the Public Notice or the EPA website: [www.epa.govt.nz/ORCplanchanges](http://www.epa.govt.nz/ORCplanchanges).**

### ORC Submission Period

The ORC previously notified WPPC on 18 March 2020 and the submission period closed 4 May 2020. If you made a submission on the WPPC to ORC, your submission will be treated as having been made to the EPA. However, you may also make a submission to the EPA if you have already made a submission to ORC.

### 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](mailto:ORCplanchanges@epa.govt.nz).

### How to make a submission

Your submission on WPPC must be received no later than **5pm on Monday, 17 August 2020**.

You must also send a copy of your submission on the WPPC to the ORC when you make a submission.

**Submissions on the WPPC can be made by either:**

1. Using the online submission form on the EPA website under [www.epa.govt.nz/ORCplanchanges](http://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](mailto:ORCplanchanges@epa.govt.nz) (if smaller than 10 MB) with the following subject line: Submission [Your Name] ORC Plan Change (WPPC);  
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](mailto:policy@orc.govt.nz) (if smaller than 10 MB) with the following subject line: Submission [Your Name] ORC Plan Change (WPPC); Posting it and any supporting information to Otago Regional Council (attention Rachel Currie), Private Bag 1954, Dunedin 9054
2. 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

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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.

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## 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

<b>Name of organisation:</b> <i>(if relevant)</i>	Traquair Station		
<b>Title:</b>	X Mr Mrs Miss Ms Dr Other: (Please tick the appropriate title)		
<b>First name of submitter:</b>	Charles	<b>Surname of submitter:</b>	Reid
<b>First name of contact person:</b> <i>(if different to above)</i>		<b>Surname of contact person:</b> <i>(if different to above)</i>	
<b>Home Ph:</b>	██████████	<b>Work Ph:</b>	
<b>Mobile:</b>	██████████		
<b>Email address for service:</b>	██		
<b>Postal Address:</b> <i>(or alternative address for service)</i>	██ ██████████	<b>Postcode:</b>	██████

# Part B

Submitter Name: Charles Reid, Traquair  
Station \_\_\_\_\_

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 the Water Permits Plan Change - Plan Change 7 (WPPC) proposed 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.***

I am not a person who <b>would not</b> gain an advantage in trade competition through this submission.	I am a person who <b>would</b> gain an advantage in trade competition through this submission. no I am directly affected by an effect of the plan change that (a) adversely affects the environment and (b) does not relate to trade competition or the effects of trade competition. Y N no
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## What are you submitting on?

*You can submit on specific parts of the WPPC or the whole plan change.*

I am submitting on the <b>whole</b> of the WPPC	I am submitting on <b>specific parts</b> of the WPPC (please detail below)
The specific parts of the WPPC that my submission relates to are:	
On going development post 17/18 Grandparenting as a policy.	

## What is your view on the WPPC or the specific parts listed above?

Please select one, if you have multiple views state clearly in the comments box below.

Support	Neutral	Oppose yes
The reasons for my view are:		
<p>I am not in favour of grand parenting as a policy .at all. Nitrate use or leaching of nitrates, this proposal doesn't encourage large users of N to start to reduce their reliance on N. The properties that Have lower use of nitrogen, they are not credited for their lesser reliance of N and the work they have done to reduce their reliance on N .If there is a blanket 10% reduction called for of nitrogen ,by the regional council this will be unfair to those lower leaching properties .So I totally oppose this..</p> <p>. proposal. ON going Development post 17/18 doesn't look to be allowed, which I would like to be Reconsidered depending on the definition of development .</p>		

## What decision would you like the Environment Court to make?

Please select one, if you have reasons for your view or suggested amendments please state clearly in the comments box below.

Approve the WPPC	Approve the WPPC with amendments YES	Decline the WPPC
The reasons for my view and/or any amendments I am seeking are:		
<p><b>I want Grandparenting as a form of regulation removed and replaced with a tared/ floored system to more effectively manage nutrient loss.</b></p>		



## 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

<p>I <b>do not wish</b> to be heard in support of my submission NO</p>	<p>I <b>wish</b> to be heard in support of my submission.</p> <p>If others make a similar submission, I will consider presenting a joint case with them at the hearing.</p> <p>I intend to call an expert witness(es)</p> <p><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></p>
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## Authority to Act

I confirm that I have authority to sign this submission on behalf of the submitter

Signature: Charles W Reid \_\_\_\_\_ Date: 16/08/2020 \_\_\_\_\_