

OTAGO REGIONAL COUNCIL

PROPOSED OTAGO REGIONAL POLICY STATEMENT

Submission from

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Background

My name is Andy Barratt. My wife and I live on a 17ha small farm on the outskirts of Karitane. Since 1992, we have planted many thousands of trees and have a small market garden supplying vegetables and fruit to the Dunedin community. Our produce is certified organic under the Organic Farm NZ scheme.

Although I have a keen interest in rural affairs and a particular interest in matters relating to biological systems of land management, I have no formal academic or professional qualifications relevant to the matters covered in the Proposed Regional Policy Statement.

Preamble

I begin by commending the ORC for having produced what must be seen as a landmark document. It is comprehensive, well presented and gratifyingly free of redundant bureaucratese. It will surely serve as a sure foundation for future work to improve our local environment.

Particularly heartening is the commitment to the concept of "ki uta ki tai" which signals a determination - reflected throughout the document - to work in a spirit of true cooperation with the first settlers of the land and to honour the notion of "kaitiakitanga" based on an understanding of the interconnectedness of the whole environment.

I will concentrate in what follows on one all-important aspect of the document - the soil.

The importance of soil

A document search reveals that the word "soil" appears on 25 of 220 pages. Interestingly, the words "sediment" and "sedimentation" occur on 29 pages. These numbers reflect what I observe to be a strong tendency in this document to refer to soil overwhelmingly in relation to its role in degrading our waters. (Many of the references to "soil" also relate to its negative effects on the life of streams, rivers and oceans.)

This emphasis is quite understandable, given that so much of the ORC's attention - like that of other regional bodies - has been captured by problems relating to the quality and quantity of water. The recent promulgation of National Environmental Standards for Freshwater and a National Policy Statement for Freshwater Management (p.74) has also led regional authorities to concentrate on this one dimension of soil management.

That said, the section of the Regional Policy Statement devoted to soil (pp.137-8) covers most of the bases one would expect to find. LF-LS-P17 "Soil Values"; LF-LS-P18 "Soil Erosion"; LF-LS-P19; LF-LS-P20 "Land Use Change" all point in the direction of positive change. But, to my mind at least, they fail to quite hit the nail on the head in terms of the principles they invoke.

This is what I mean:

- When talking about the loss of soil, we need to be clear that this is a matter of far wider import than the effects of sedimentation on waterways. It has long been understood that loss of topsoil all round the world is one of the most significant threats we now face, as important in its own way as climate change itself.¹ Put simply, we need not only to do everything we can to conserve the soil we depend upon but also to take all active steps in our power to *build* our reserves of productive topsoils.
- LF-LS-P20 ("Land Use Change") lists three important issues - sustainability and efficiency of water use; resilience to the impacts of climate change; health and quality of soil. But it fails to name the crucial process that links these three elements - HYDROLOGY. And it is hydrology that is the key to two aspects of the climate crisis - DROUGHT and GLOBAL HEATING.
- There is a growing body of evidence that good management of soil offers perhaps one of the most promising ways to avert the worst of the catastrophe. Again, this is nothing new. Indeed, New Zealand is just one of many countries to have signed up to the "4 per 1000" initiative launched at the Paris Climate Summit

in December, 2015. The initiative aims "to demonstrate that agriculture, and in particular agricultural soils can play a crucial role where food security and climate change are concerned".ⁱⁱ The name "4 per 1000" derives from the ambition to increase soil carbon stocks by 0.4% per year in the top 30-40cm of soil.

- Although the "4 per 1000" initiative focuses on the potential of soil to sequester carbon (and hence mitigate the effects of greenhouse gas emissions), the capacity of carbon rich soils to hold moisture is of equal importance.ⁱⁱⁱ
- Increasing soil organic matter is a fundamental part of biological land management. LF-L5-P17 (1) - "[sustain healthy] soil biological activity and biodiversity"; and LF-L5-P18 (2) "maintain vegetative cover on erosion-prone land" both presuppose a biological focus, although the latter point is unduly restrictive in focus.
- Inevitably, a shift in favour of biological methods will entail a shift away from many practices currently employed on our farms. The need for such change is acknowledged directly on one occasion: "Some land management practices can compromise productive capacity of agricultural land, for example, loss of soil through erosion or soil structure through compaction" (p.84). But, for obvious reasons, the Regional Policy Statement errs very much on the side of understatement (!) in its explicit critique of the current dominant paradigm.
- In similar vein, the document glosses over the manifold issues that come with the widespread use of synthetic fertilizers, herbicides and pesticides. Once again, the main focus here is on the impact on water quality rather than the many other implications of our reliance on artificial inputs. Not least among these is the embedded carbon content of the inputs themselves and the fossil fuel use associated with their transportation and application.

Evaluating and monitoring

Part 4 of the document is perhaps the most problematic. Although it quite rightly acknowledges the need to develop a comprehensive and integrated Regional Monitoring Strategy (p.198), there is clearly a great deal of work to be done.

The recent report from the Parliamentary Commissioner for the Environment on the monitoring tool "Overseer" has only served to sharpen the debate. But it does mean that the ORC is in the position of having to go back to basics and to consider, among other things, whether it is

desirable to rely on modelling for the purposes of environmental monitoring and whether we are measuring all the right things. (Should we, for example, include soil carbon as part of a monitoring regime?)

Waste

HAZ-CL-PR2 Principal Reasons (p.174) states: "Resources need to be carefully used to minimise the material disposed of as waste". This is a sensible and necessary provision. There is, however, very little in the draft by way of detailed or specific reference to the means by which this intention is to be achieved or enforced. Although there are numerous scattered references to waste water and landfill sites, waste management receives cursory treatment and this must be considered a serious deficiency.

As a resident in the rural zone, I am particularly concerned about the management of biological waste on our farms and lifestyle blocks. As I see it, animal wastes receive consideration only insofar as they can be seen as a threat to water safety and quality (e.g. the reference to E. coli on p.77). As for vegetative waste, this attracts no mention at all, even though its main means of disposal (by burning) is a daily occurrence at this time of the year in our district. I would like to add here that the current rules about such activities - especially the burning of green materials - are regularly honoured in the breach and that complaints to the ORC appear to result in no significant action.

In the case of vegetative waste, burning obviously contributes to the atmospheric pollution that has been recognised as a serious problem. This is particularly so in winter time - the traditional "burning season" - when inversion layers often trap smoke close to ground level. The disposal of biological waste relates to far more than environmental pollution, however. If the ORC is to hold true to the principals of Ki uta ki tai, I suggest that it must take steps to encourage the conversion of biological waste into useful products - products which can also serve the larger purpose of climate change mitigation and adaptation. Animal wastes can (and sometimes are) used for the production of energy. Vegetative waste can be converted to compost or biochar, both of which can aid the sequestration of carbon in our soils. (The benefits to soil fertility of all kinds of biological waste have been known since the beginning of farming, of course.)

As with so much in the area of appropriate waste management, we are only just beginning to make up for the errors of our ways. It would be foolish to argue that the Policy Statement should contain strict rules and

regulations, other than those currently in place. But I do believe it is imperative that the Statement signals the ORC's intention to work with our rural landowners to move in the direction of truly sustainable land management.

Conclusion

It would be naïve in the extreme to imagine that the direction indicated in this submission would prove palatable to those with political and economic interests in the maintenance of the *status quo*. Yet I urge the Otago Regional Council to build on the positive intention of its Proposed Regional Policy Statement and work with those in our rural communities who are already dedicated to making the more radical changes required by our current converging crises.

ⁱ FH King's *Farmers of Forty Centuries*, published in 1911 is perhaps the earliest modern work to warn of a crisis that has come to pass.

ⁱⁱ <https://www.4p1000.org/>

ⁱⁱⁱ For a comprehensive account, see Walter Jehne's article "Regenerating Earth's Soil Carbon Sponge" - <https://www.healthysouils.com.au/Research-1>

Proposed Otago Regional Policy Statement 2021

Information for Submitters

Submissions must be in the prescribed form (Form 5) specified by the Resource Management Act and must be received by Otago Regional Council
by 3 pm Friday 3 September 2021

Privacy: Be aware that **all submissions are considered public**, including your name and address which will be uploaded to ORC website as part of this process. The Council and further submitters will use your name and contact details for correspondence in relation to the making of the Regional Policy Statement.

LODGE A SUBMISSION MANUALLY (*USING FORM BELOW*)

A template complying with the requirements of Form 5 is provided below. Once completed, please forward to ORC by one of the following:

Email: rps@orc.govt.nz Submissions in MS Word or other editable format are preferred, if possible

Post: Otago Regional Council, Private Bag 1954, Dunedin 9054. Att: ORC Policy Team

Hand Delivery at

Dunedin: Otago Regional Council Office, 70 Stafford St, Dunedin, Att: ORC Policy Team

Queenstown: Terrace Junction, 1092 Frankton Road, Queenstown, Att: ORC Policy Team

Alexandra: William Fraser Building, Dunorling Street, Alexandra. Att: ORC Policy Team

INQUIRIES

Email: rps@orc.govt.nz

Phone: ORC Call Centre: 0800 474 082, Monday - Friday, 8am-5pm

NOTES TO PERSON MAKING A SUBMISSION

If you are a person who could gain an advantage in **trade competition** through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that 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 contains offensive language:
- it is supported only by material 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 advice on the matter.

Go to Written Submission Form on next page

Written Submission on Proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)

To: Otago Regional Council

1. **Name of submitter** *(full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)*

Andy Barratt

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.
3. I **could not** *(Select one)* gain an advantage in trade competition through this submission. *(See notes to person making submission)*
4. I **am not** *(Select one)* directly affected by an effect of the subject matter of the submission that
- a. adversely affects the environment; and
 - b. does not relate to trade competition or the effects of trade competition *(See notes to person making submission)*
5. I **wish** *(Select one)* to be heard in support of my submission
6. If others make a similar submission, I **will** *(Select one)* consider presenting a joint case with them at a hearing
7. **Submitter Details**

- a. **Signature of submitter** *(or person authorised to sign on behalf of submitter)*

- b. **Signatory name, position, and organisation** *(if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)*

Name
Position
Organisation

- c. **Date**

3 September 2021

Address for service of submitter (*This is where all correspondence will be directed*)

d. Contact person (*name and designation, if applicable*)

Andy Barratt

e. Email:

asbarratt@gmail.com

f. Telephone:

021890048

g. Postal address (*or alternative method of service under [section 352](#) of the Act*):

317 Apes Road, RD1, Waikouaiti 9471

8. My submission is:

<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	<i>Column 4</i>
<p><i>The specific provisions of the proposal that my submission relates to are:</i></p> <p><i>(Please enter the relevant objective, policy, method, or 'other' provision reference where possible. For example, 'AIR-O1'.)</i></p>	<p><i>I support or oppose the specific provisions or wish to have them amended.</i></p> <p><i>(Please indicate "support" or "oppose" or "amend")</i></p>	<p><i>The reasons for my views are:</i></p>	<p><i>I seek the following decision from the local authority:</i></p> <p><i>(Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)</i></p>

Note: Additional rows for each separate provision or submission point should be added as required.

From: [Andy Barratt](#)
To: [RPS](#)
Subject: Re: Draft Regional Policy Statement
Date: Friday, 3 September 2021 11:04:10 a.m.
Attachments: [ORC.PolicyStatement.doc](#)
[form-5-written-submissions-form-on-proposed-otago-rps-2021\(4\).docx](#)

Dear James,
I have filled out the form (although have no ready way of signing it). I attach it and the document which sets out my submission. I hope this is acceptable.
Many thanks,
Andy

On Fri, Sep 3, 2021 at 10:48 AM Andy Barratt <asbarratt@gmail.com> wrote:

Thanks, James.
I will resend the submission using the link you sent.
Andy

On Fri, Sep 3, 2021 at 10:41 AM RPS <rps@orc.govt.nz> wrote:

Kia ora Andy,

How did you send in your submission? I haven't seen it yet, so I'm unable to check if it uses the prescribed form (form 5).

If it does use the form, there is a question on the form about whether you wish to be heard in support of your submission (question 5 on the form).

Submissions that don't use the form can still be accepted, but the form helps ensure that the required information is provided.

If you haven't seen it, the form is available here, under the heading "make a submission": <https://www.orc.govt.nz/plans-policies-reports/regional-plans-and-policies/otago-regional-policy-statements/proposed-otago-regional-policy-statement-2021>

Kā mihi,

James, on behalf of the RPS team

From: Andy Barratt <asbarratt@gmail.com>
Sent: Friday, 3 September 2021 10:30 a.m.
To: RPS <rps@orc.govt.nz>
Subject: Draft Regional Policy Statement

I have just put in a submission on the draft RPS.

There is no mention I could find of whether those making submissions can ask to be heard at hearings.

If this is a possibility, I would like to register my wish to be heard.

Yours sincerely,

Andy Barratt