

**BAY OF PLENTY
REGIONAL COUNCIL
TOI MOANA**

Submission form

Send your submission to reach us by **4:00 pm** on **Wednesday, 27 April 2016**.

Submission number
Office use only

20 APR 2016

Post: The Chief Executive
Bay of Plenty Regional Council
PO Box 364
Whakatāne 3158


or Fax: 0800 884 882

or email: rules@boprc.govt.nz

Submitter name:

This is a submission on **Proposed Plan Change 10 (Lake Rotorua Nutrient Management)** to the **BOP Regional Water and Land Plan**.

- 1 I ~~could/could not~~ gain an advantage in trade competition through this submission. *[Delete as required.]*
 - (a) I ~~am/am not~~ directly affected by an effect of the subject matter of the submission that adversely affects the environment, and
 - (b) My submission ~~does/does not~~ relate to trade competition or the effects of trade competition.
[Delete the entire paragraph if you could not gain an advantage in trade competition through this submission.]
- 2 The details of my submission are in the attached table.
- 3 I ~~wish/do not wish~~ to be heard in support of my submission. *[Delete as required]*
- 4 If others make a similar submission, I will consider presenting a joint case with them at a hearing. *[Delete if you would not consider presenting a joint case.]*


[Signature of person making submission or person authorised to sign on behalf of person making submission.]
[NOTE: A signature is **not** required if you make your submission by electronic means.]

16/4/16
Date

Address for service of submitter:

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Contact person: [Name and designation if applicable]

R MACKAY

SUBMISSION POINTS:

Page no.	Reference (e.g. Policy, rule, method or objective number)	Support/oppose	Decision sought Say what changes to the plan you would like	Give reasons
12/13	LR R4 LR R4	OPPOSE	gop attached.	spp attached
25	SCHEDULE LR TWO STOCKING RATES	OPPOSE	" "	" "

Bay of Plenty Regional Council

Re- **Proposed Plan Change 10: Lake Rotorua Nutrient Management**

Referencing - Pages 12 & 13 clause LR R4

I oppose this clause

Decision sought –

More flexibility with stock numbers and an increase in stocking rate allowed under the rules without the need for a resource consent.

Alternatively seek the co-operation of the Rotorua District Council towards reducing the size of rural life style blocks (5-10ha) to a size that truly reflects a lifestyle block.

Reasons –

The stocking rates under the rules are too restrictive

We have a total of 7.7ha (approximately 7ha effective).

Having retired our commercial Forest Nursery operation we have run low livestock numbers towards overcoming problems with bloat in our cattle caused by very prolific clover growth that has followed years of Nursery production. Under the proposed rules we are now faced with even lower stock numbers, unless we apply for a Resource Consent. I really do not want to be bothered with Resource Consents (and the associated costs) but it appears that I will have no option but to do so.

Under the present proposal a property of 5ha (i.e. some of my neighbours) will be able and quite capable of carrying more stock than our selves because due to our size (50% larger) we become restricted under the rules.

Under the proposed rules no allowance is made for the fact that seldom is one able to replace stock that is sent to the meat works immediately, it can often take several months to replace stock. In the meantime there will be little or even no stock on the property for several weeks or months.

Further to the above point; it is also very difficult to purchase exact numbers required in a cattle market, so one either ends up overstocked (breaking the rules) or ends up below the allowable limits leading to even lower economic returns.

As an alternative, properties of our size should be given the opportunity to subdivide into smaller sizes and become truly lifestyle blocks. My discussions with Regional council personnel suggest that is an option yet the Rotorua District Council is proven to be hostile to the suggestion.

Bay of Plenty Regional Council

Re- **Proposed Plan Change 10: Lake Rotorua Nutrient Management**

Referencing – Page 25 Schedule LR Two – Stocking Rates

I oppose this clause

Decision sought –

More flexibility and an increase in stocking rate allowed under the rules without the need for a resource consent.

Reasons –

At the proposed stocking rates control of weeds is going to become more difficult as grazing management will be almost non-existent with regards to weed control. At these low stock numbers, there is also the question of the economics of maintaining properties with the lower returns that have to be expected.

Resource consents are expensive to land owners, not only the cost of application (no doubt good revenue for the Regional Council) but also the time and cost of preparing them.

It has been suggested that surplus can be made into hay/silage, but with all property in the area being required to reduce stock numbers, no one will need it. Shipping out of the area is not normally economic as the value after cost of baling and transport is about zero.

If it is not economic to bale and sell surpluses it means that there will be a lot of rank dry grass during hot summer months, not only will this add to weed problems there also becomes a fire risk in a dry season.