



## Submission form

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

Submission number  
*Office use only*

<b>Post:</b> The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatāne 3158	<b>or Fax:</b> 0800 884 882	<b>or email:</b> rules@boprc.govt.nz
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**Submitter name:** Astrid Coker

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

- 1 I am not a trade competitor for the purposes of the submission but the variation sought in Plan Change 10 has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.
- 2 The details of my submission are in the attached table.
- 3 I **do not wish** to be heard in support of my submission.

\_\_\_\_\_  
[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.]

24 April 2016  
Date

<b>Address for service of submitter:</b>	P.O.Box 3 Rotorua 3040	
<b>Telephone:</b>	<b>Daytime:</b> 07 3575999	<b>After hours:</b> 07 3575999
<b>Email:</b>	cokerast@hotmail.com	<b>Fax:</b>
<b>Contact person:</b> [Name and designation if applicable]	Astrid Coker	

## **Type of property**

Our property is approximately 22 hectares and is currently a drystock farm. The topography varies from predominantly flat to rolling contour with some steep hill country.

The location is in Tarukenga approximately 14 km north of Rotorua.

Environmental mitigation actions which have already been taken include:

- Stocking rate is within the Plan Change 10 Schedule LR Two table (p25)
- The stock predominantly grazed over winter are ewe hoggets and breeding ewes
- No irrigation
- No cropping
- Exclusion of cultivation –no tillage practises
- The planting of diverse pasture species
- Use of biological farming practises to increase humus, soil organic matter and earth worm numbers
- Predominantly use low soluble P fertiliser forms
- Steep land , rolling contour and flat land have all been fenced separately
- Planting of deep rooting woody shrubs in paddocks and along side internal fence lines
- Planting of willows and poplars
- Previous owners planted a Riparian Strip containing natives and *P.radiata* along the entire North Eastern Side of the boundary
- The South side of our property has a 4m hedge
- We have started planting hedges along the Western side of the boundary and in the future plan to extend this

Our farm is unlikely to be a high nitrogen loss property but instead a sustainably managed farm with practises based upon the current science available for Nitrogen and Phosphorus mitigation. I have been advised by the Regional Council that our pNDA (provisional Nitrogen Discharge Allowance) is based upon the average for farming enterprises under 40ha in size although I have not yet been given a figure . Consequently at this point in time I am unable to assess the long term implications of Plan Change 10 relating to the calculation of the nitrogen discharge limit and its application to our property. I am unable to give an informed opinion on the numbers generated for nitrogen loads by Overseer, although enhancement of the water quality of the Lakes is important. Farming is already a volatile business without having further uncertainty around the numbers generated through programming changes with different versions of Overseer.

**My submission points on the following pages relate to all parts of the plan that allocate a nitrogen load and applies it as a fixed nitrogen discharge limit to my property**

**SUBMISSION POINTS:**

Page No	Reference	Support/Oppose	Decision Sought	Reasons
2, 5	Table LR 1, Table LR 2, LR P3	Oppose results being used from different versions of Overseer	All results to be calculated by the latest version of Overseer. Refer Schedule LR Five.	On Farm Nitrogen Discharge Allowances are now calculated using Overseer version 6.2. It is not clear why some calculations in PC10 use Overseer 5.4 and others 6.2
				Need to use the best science estimates of nitrogen entering the lake. Presumably the latest version of the model has updated inputs reflecting the current science
6	LR P5, Table LR 4	Oppose the allocated nitrogen loss range for drystock farms	All rural properties should have the same nitrogen discharge/ha/yr	PC10 discriminates against drystock farms which are already farmed sustainably. The plan change limits the flexibility in land use and stock class
				The allocation is based on my current land use and not my ability to manage effects or whether the land use is suitable for the productive capacity of the soil and other types of farming.
				My farm is unlikely to be a high nitrogen loss property due to sustainable management practises
				Anyone using the best practical science available currently in their farming practice is being penalised. Should problems with these practises arise in the near future the flexibility and adaptability to change has been taken out of the system. No two years in farming are the same.
				The current proposed plan change may restrict my flexibility and adaptability in the future to respond to changing market signals for selling produce with possible negative economic consequences

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6,7	LRP9(c), LRP9(d), LRP15	Oppose as a permitted activity the use of land less than 5ha and 5-10ha without a nutrient discharge plan (nitrogen management plan)	Include information keeping (Schedule LR Three), reporting conditions and nutrient discharge plan (nitrogen management plan) , for all land used for agriculture, horticulture etc	More often blocks less than 10ha do undertake commercial activities involving grazing and sale of livestock . Owners of these properties more often are least experienced in farming practises around land management and stocking rate. These blocks too have problems with erosion , sediment discharge, nitrogen leaching and surface water runoff arising from stock policies and climatic conditions. PC10 makes subdivision of larger properties into 10ha or less more desirable by virtue of their exclusion from the reporting processes required for blocks larger than 10ha.
8	LRM1	Support	Support better flow of information between Regional Council and Rotorua District Councils during the subdivision process	More communication between the Regional Council and Rotorua District Council during the subdivision process (rural and urban) on land capability for nutrient discharges (N,P,faecal bacteria, pathogens) so that appropriate mitigation measures can be put in place at an early stage in the application process.

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9	LRM4,LRM 5	Support Regional Council monitoring of permitted activities and encourage industry good practices	Small increase in rates to cover compliance costs	<b>The original problem emanated from the pumping of raw sewage into Lake Rotorua by the District Council</b> and was not created by farmers many kilometres away with their septic tanks and unintensified farming practices of that time . All sectors of the community and businesses (tourism) enjoy the benefits from enhanced water quality of the Lakes. While farmers undertake practical environmental mitigation measures on their property at their expense , the use of consultants ,compliance costs, Overseer files and other bureaucracy, should be met by the Regional Council.
			Regional Council to organise regular and timely updates on scientific information to keep farmers informed	
			Regional Council involvement in research funding applications to allow for experimentation with alternative methodologies and other relevant science	
12	LR R1	Oppose the disallowance of higher nitrogen inputs in the future	Allow tactical use of nitrogen input when required	Under adverse conditions where science is unable to provide a solution or the farmer is unable to remove stock from the property, the tactical use of nitrogen input may be required in order to mitigate the effect of pasture pests/diseases , and climatic conditions .

Page No	Reference	Support/Oppose	Decision Sought	Reasons
29	Schedule LR 5	Support/Oppose Use of Overseer. Overseer appears to be under -developed and overused !	Only use Overseer as a decision support tool to allow Council and farmers to understand compliance with discharge limits.	Overseer is an example of an evolving mathematical model describing a complex biological system with scientific inputs continuing for many years into the future as more and more variables become known and included in the model to improve its accuracy
			The Overseer files should be overseen and paid for by the Council along with hiring the appropriate consultants. Farmers should not be paying for what appears to be an under developed and evolving system relied on by the Regional Council for monitoring nutrient discharges.	The calculation of nitrogen discharge should be on an intuitive platform with a self monitoring process as farmers decide to adopt different practises in the future and should be like filling in a tax return. For the latter the individual has the choice of whether to employ an accountant or do the return themselves. Instead with Overseer under PC10 the farmer has to hire a consultant with the appropriate qualifications at considerable cost to diffuse the confusion surrounding monitoring compliance, discharge limits , and farm plans so that no one is liable should the numbers be found inaccurate or discredited in later years.This requires a level of bureaucracy, complexity and accumulating costs around resource consents, farm plans and Overseer data and files. Operations larger than 40ha are more likely to absorb these ongoing costs.

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21, 32, 33	Definition of suitably qualified and experienced person	Oppose the requirement for a suitably qualified person	Refer above. Remove the requirement for farmers to hire a suitably qualified person for administrative purposes of Overseer	Refer above ie. Overseer use or a suitable alternative should be intuitive
33	Schedule LR six	oppose B5(f) fertiliser management	Self monitoring of fertiliser distribution and quantity /ha without the requirement for compulsory application by accredited commercial spreader	On blocks with small paddocks heavy spreaders cause damage to soil through compaction as well as being an unnecessary expense. There are Issues with possible inexperienced drivers unfamiliar with your terrain as well as requirements under the Health and Safety Act.