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From dixon reeves <dixonreeves@hotmail.com>

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Subject Submission on Proposed Plan Change 10 to the Bay of Plenty Regional Water and Land Plan.

Submission on Proposed Plan Change 10 to the Bay of Plenty Regional Water and Land Plan

Form 5: Submissions on a Publicly Notified Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

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I am not a trade competitor for the purposes of the submission but the variation 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.

I do wish to be heard in support of this submission

Background:

Located on Upper Oturoa Rd Ngongotaha . SECTION 3B BLK XI ROTORUA S D
80 hectares in size.

The property was purchased by my late father Colin Reeves in 1950 and developed from fern and tree stumps .Fertilizer was initially spread by hand until the advent of aerial application later that decade. A new house was constructed in 1957. to house a growing family of 5 children. With the arrival of tanker collection a new cowshed was constructed in the late 1960's.

The entire farm was fenced and subdivided and by the 1970's was running 90 cows along with 200 ewes and 20 -30 bulls.

The Dairy operation ceased in 1978 and the Sheep and Beef increased in compensation. A Woolshed was built in 1980.

Currently the farm has a Ewe breeding flock of 250 - 300 with lambs fattened and 100 -120 cattle purchased annually and fattened.

Since a young age I have always wanted to be a farmer and with that in mind I completed a Bachelor Degree in Agricultural Science in 1983.

Mitigation activities carried out:

Early 1980's Riparian fencing of the creek (upper Waiteti stream) approximately 3 Km with 1:9 subsidy.

Willows and flax planted along stream banks. Approximately 3Ha native bush retired.

Late 1990's a further 3 Ha of steeper grazing land adjacent to the Stream was retired involving further fencing.

April 2013. 2 Detainment Bunds built to control Phosphate runoff during storm floods. This was funded through BOPRC via roading grants.

Future activities.

Approximately 8 Ha of Native bush currently not grazed to be permanently fenced off at my expense.

Other comments:

During the Benchmarking period of 2001 - 2004 the farm was run as a Dairy grazing operation, wintering 250 -300 Cows and growing 240 dairy heifers over summer while still retaining the sheep.

Since 2008 this has ceased with the farm reverting to sheep and beef fattening as stated earlier, consequently the environmental impact will be considerably reduced.

Fertilizer strategy is also markedly different compared with earlier decades of significant amounts of Superphosphate and Nitrogen use.

In the early 1990's a change was made to Dicalcic Phosphate which is a more biologically active form.

In the last 10 years Biological fertilizer in the form of Compost base with Lime and Dolomite has been used with great results.

I'm convinced this on its own is having a much lesser environmental impact with its ability to retain both Nitrogen and Phosphate in the Humus and root zone and in a plant available form.

Key points of issue in relation to PC10 - in context of LR R9 in my case:

- How PC10 will affect your farm business, including profit, capital value and flexibility in the future

Loss of flexibility to change farm business to adapt to altered market conditions .

Lack of confidence to invest because of uncertainty of returns.

- The level of bureaucracy, complexity and ongoing cost around resource consents, farm plans and Overseer data.

I If the farm is at or under its NDA why should it require a resource consent and annual farm plans with associated on going costs?

- •The lack of recognition of farm industry good practice and guidance.

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- If the lake is at or near its target TLI of 4.2 the farming industry must be given some credit for its contribution
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- The reasonableness (or otherwise!) of individual farm nitrogen targets

Another approach which might have a more favourable outcome could be to have subcatchment groups with a joint target.

• The failure of policy makers to consider the alternative combinations of phosphorus and nitrogen lake targets in combination with Alum dosing, especially given:

- – the unexpected success of alum in making the lake P limited
 - the lake meeting its TLI 4.2 water quality target since 2012
 - very long time lags before N regulations can make a difference in the lake
 - uncertainty around farm Overseer modelling as it has been updated, with its estimates of farm N losses nearly doubling for the same inputs
 - uncertainty around the catchment ROTAN model which has not been rerun since 2011, despite the massive changes in Overseer.

The changes we'd like to see in PC10 include:

- Adoption of best science, ongoing 5 years reviews starting in 2017
- Farm targets to be practical and affordable
- Change to the RPS to shift the focus from 435 tonnes of N to the TLI target of 4.2
- Farm plans to site outside the Rules framework
- Thorough investigation of all lake mitigation solutions including risks, social, cultural and economic impacts

- **I seek that the Council**
 - Review the load calculation to focus on priorities for achieving water quality outcomes
 - Provide flexibility in the plan to allow for ongoing development and flexibility in farm management above the sector average
 - Provide for further transition times before the allocation framework applies to allow for increased understanding of the relative contributions and potential loads – amend the property allocation to reflect this
 - Extend the years over which the calculation of nitrogen baselines are derived to a rolling average over a four year period and provide the maximum discharge from those years as the baseline
 - Review nitrogen allocation and flexibility to lower N discharge properties to better reflect their ultimate productive potential not limited by their current land use
 - Take a whole farm approach to reducing discharges into the lake so that all farm mitigations – past current and future are accounted for in determining flexibility of land use
 - Only use Overseer as a decision support tool to allow Council and farmers to understand compliance with discharge.

Reasons for my submission

Sheep, Beef and Cropping Farmers develop farms as economic farm surplus allows – this means that limiting Nitrogen discharge now based on the level of the staged sustainable development of the farm will significantly inhibit the ability to continue to undertake staged development and to provide flexibility in land use and stock class mix in a sheep and beef farming system. My farm is not a high nitrogen loss property but a sustainably managed farm with a long term development plan. The current proposed plan change may restrict my ability to realise the long term land management plan for the property and to respond to markets

The plan unnecessarily and unfairly restricts my ability to farm by basing allocation on my current land use not my ability to manage effectively or whether the land use is suitable for the productive capacity of the soil

We do not understand loads and possible options for managing discharges well enough to be able to restrict farming businesses to their current activities – the costs outweigh the benefits .

As at 25 April 2016 I have not been issued with a NDA and have not completed a Nutrient Management Plan.

I strongly believe farming should not be an activity which is Controlled and should not require Resource consent if the NDA has not been exceeded.

Thank you for looking at my submission.

Dixon Reeves.