



## Submission form

Submission number  
*Office use only*

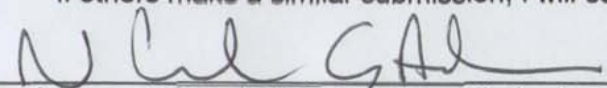
Send your submission to reach us by **4:00 pm on Wednesday, 27 April 2016.**

<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:** Nick Adams

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.]*

26 04 16  
Date

**Address for service of submitter:**

283 Dansey Rd R.D.2 Rotorua 3072

**Telephone:**

Daytime: 0274622921

After hours: 073572173

**Email:**

danseyfarm@gmail.com Fax: \_\_\_\_\_

**Contact person:** *[Name and designation if applicable]*

Nick Adams

Submitter: Nick Adams.

Dansey Farm was purchased as a drystock property in 1972. At that time the pastoral area was **221** Ha with the balance being rejuvenating native bush.

As of this year Dansey Farm has **142** Ha of pasture, **102.7** Ha pine trees and **66.9** Ha of protected native bush.

**In the 42 years I have lived at Dansey Farm the pastoral area has dropped by 79 Ha or 36%.**

### Points:

#### 1. Advice and support.

**I cannot make a full and complete submission** as I have not had the advice and support that I requested as part of the overall process. I applied for advice and support in September 2015 and there is no sign I will receive it before the close of submissions on the 27<sup>th</sup> of April.

As a property owner of area greater than 40 ha I am required to engage a **suitably qualified person** to prepare a nutrient management plan for me. Only once this plan is completed will I be able to understand the full impact of **Plan change 10**. This will not happen before the 27<sup>th</sup> of April

**I would like to suggest that the process be delayed until all those that requested advice and support receive it.**

#### 2. Schedule LR One, page 22. Methodology to determine start points.

**I oppose the use of grand parenting to benchmark properties as a method or establishing nutrient discharge allowance (NDA) start points.** Benchmarking rewards the polluters and undervalues the positive affect of those that have undertaken previous mitigation measures.

Why should a hectare of land over the fence from my property have a NDA 5 times that of an equivalent hectare of land on my side of the fence?

Those not previously benchmarked under rule 11 will automatically get an NDA of 24.7 kg N/Ha/yr, almost twice of what I am expecting to receive when I get my advice and support.

Benchmarking clearly contradicts point (a) of policy WL 5B which says equity and fairness must be considered.

**The land capital approach needs to be revisited as a way of addressing inequity.**

### 3. [Use of overseer. Schedule LR Five, page 29.](#)

#### **I support the use of overseer but as a partnership with farmers.**

Overseer was developed by MPI, The Fertiliser Association of NZ and Agresearch for use by farmers and others for free. The Regional Council has hijacked overseer and completely taken its use for nutrient budgeting out of farmers' hands.

Property owners need engagement with the one useful tool there is in assessing their impact on the environment. I have been using overseer since it was developed to run scenarios and assess the environmental impact of these. However I cannot use overseer myself when running scenarios in relation to

#### **Plan Change 10. Why?**

This is best illustrated in an example. Attached is a screenshot of the block input page of overseer. Highlighted is the input field of "**total farm area**". Property NDA's are calculated using "**effective farm area**", overseer has no input field for effective hectares. One cannot simply input effective hectares in the total farm area field as the report results produced are incorrect.

#### **Farmers need to be engaged with overseer not presented with a complicated method of determining a NDA that is the preserve of consultants.**

### 4. [Additional matters, page 24](#)

#### **I support the consideration of previous on-farm nitrogen loss mitigations in the calculation of properties NDA in exceptional circumstances.**

As the owner of Dansey Farm and like my father before me I have invested heavily in nitrogen loss mitigation since the property was purchased. 102.7 Ha of pine trees have been planted, 30 ha is in its second rotation. At approximately \$4000/ha (at current costs) that's a big investment. (See attached map).

**I would like to see recognition of this mitigation reflected in the calculation of my NDA. As I have not had any advice and support I cannot be sure how this clause (additional matters, page 24) will be interpreted.**

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### Blocks

Enter all blocks on the farm and their area. A block is defined as an area of land under the same management. Additionally, it is recommended that total area of the farm is added.

Block name	Type	Effective area (ha) ?		
Top rolling podzol	Pastoral	29.8		
Bottom rolling allophanic	Pastoral	57.6		
Cell	Pastoral	52.0		
Hay	Pastoral	3.0		
Winter crop	Fodder Crop	-		
Grazed pines - podzol	Pastoral	73.5		
Grazed pines - allophanic	Pastoral	29.2		
Bush	Trees and Scrub	66.9		
House	House	2.7		

Select block type and add

Pastoral

Total farm area 317.6 ha ?

Total area declared as blocks 314.7 ha ?

Non-productive area 2.9 ha  
(includes lanes, races and yards)

- Save
- Save & Continue
- Continue
- Reload

*"A strategic management tool to  
better use of nutrients on farm and  
losses to the environ*

# Pines

Owner ADAMS, NICK

- Boundary

