

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

To: The Chief Executive
Bay of Plenty Regional Council
PO Box 364
Whakatane 3158

Submission On: Proposed Plan Change 10 (Lake Rotorua Nutrient Management)
to the Bay of Plenty Regional Water and Land Plan

Name of submitter: Te Paiaka Lands Trust

Contact Person: Bill Young
PO Box 716
Rotorua 3040
Aotearoa, New Zealand
Phone: 0272741704
Email: bill.young@clear.net.nz

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 not wish to be heard in support of this submission

SUBMISSION

BACKGROUND

Te Paiaka Lands Trust is a Whenua Tōpu Trust which manages Māori Land belonging to descendants of Paiaka, a Ngāti Kea/Ngāti Tuara hapū of Te Arawa. Te Paiaka lands extend from Rotorua southward to Horohoro Mountain. Te Paiaka aims to sustainably control their lands. As part of this sustainability the Trust is looking to move away from traditional sources of income (sheep and beef units) and to creatively explore options which will more adequately foster self-reliance and the social, political and economic sustainability of the hapū

Te Paiaka Lands Trust farms a total of 864 hectares of land of which 466 hectares is effective farmed area. Of this total land holding some 707 hectares (347 hectares effective) is located within the Lake Rotorua catchment and is therefore directly affected by the proposed changes. Within this is a total of 77ha that is lease land from a neighbouring Māori Trust.

The farm is located at the top of Utuhina Road on the south western edge of the Lake Rotorua catchment and is primarily within the Utuhina Stream catchment. Approximately 150ha of the land is located in the Tureporepo Valley and feeds into Lake Rotorua through the Puarenga Stream.

The effective area of the farm is operated as a dairy grazing, beef and sheep farm with the balance of the farm in either native bush or pine forest.

CURRENT MANAGEMENT

Since the Trust took back the control of its land in 2001 there has been a significant focus on operating a profitable and sustainable farming business. The Trust is reliant on the farming operation as the sole provider of income to the Trust to support its activities.

Since 2001 the Trust has focused heavily on the improvement of the land that it operates to ensure the goals of the Trust can be met both now and in the future. This has included:

- Installation of a fully reticulated water system to keep stock out of waterways
- Retirement of land in conjunction with the BOPRC in sensitive areas including ensuring that all waterways on the farm have 100% stock exclusion
- Retirement of land in conjunction with Ngā Whenua Rāhui including kawenata's placed in conjunction with the BOPRC
- Removal of winter dairy cows to reduce nitrogen leaching
- Limited nitrogen applications
- Maintaining sensible stocking rates in line with the capability of the land
- Conversion of gorse land to farm production to reduce nitrogen leaching

Without rules impacting on land use decisions the Trust will be undertaking the following measures in the future:

- Further retirement of steep sidings and gullies including retirement planting
- Installation of containment bunds on key gullies to reduce sediment flow
- Continued focus on complete gorse eradication across the farm
- Focus on efficient stock policies that will improve profitability but also improve nitrogen efficiency

IMPACT OF RULES

The rules as they are currently proposed will have the following impact on Te Paiaka Lands Trust:

- As a Māori entity with an ever growing shareholder base there is a need to ensure growth of the business to ensure there is the ability to support our people. The current rules will limit the ability to grow the farming operation to achieve this.
- As a farm that was underdeveloped for many years prior to being taken back to our control in 2001 we now become limited by history rather than the quality of our land or current management.
- As a small scale farm we do not have the size, resources and funding to soak up any impact that restrictions will have. Modelling has suggested that the current restrictions would make the farm non-viable in the years to come
- As a Māori entity we are focused on cash returns rather than growth of equity and long term growth of land value (making up 50% of real farm returns) is of no value to us.
- Te Paiaka Lands Trust is currently working with the neighbouring Māori Land Trust to develop and improve their lands. As part of this process there is a significant portion of the land that is being converted from mature gorse and back into pasture and forestry. This project is being undertaken with the full backing of BOPRC and the Trust has utilised funding avenues available to assist with this. It is a concern that moving forward while this land will be farmed more sustainably and with a lower nitrogen footprint, that this potential land use would be restricted.

WE OPPOSE:

- Applying nitrogen baselines as currently calculated and the timelines proposed to achieve them
- The current load limit for the catchment
- How the nitrogen discharge limit is calculated and applied to my property
- The allocation of nitrogen within the Lake Rotorua catchment

WE 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 limits

REASONS FOR OUR SUBMISSION

1. As Māori land owners who will not be selling the land there is a vested interest in ensuring that any land use is completed in the most sustainable manner. This is always the focus, with or without rules.
2. We do not have the ability to sell land and move elsewhere if we do not agree with the regulation, process or outcomes.
3. We must take a long term view and look for long term solutions. To this end we must ensure that we work with science and ensure there is capacity within regulation to move as science tells us new answers. We must not be fixed in the setting of targets and limits if the science and research is telling us differently. We must ensure adequate reviews
4. 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. Our farm is not a high nitrogen loss property but a sustainably managed farm with a long term development plan. The current proposed plan change will restrict our ability to realise the long term land management plan for their properties.

5. The current plan unnecessarily and unfairly restricts our ability to farm by basing allocation on my current land use not my ability to manage effects or whether the land use is suitable for the productive capacity of the land.
6. We support the application made by the Lake Rotorua Primary Producers Collective.

From: rules
To: ["Bill Young"](#)
Subject: RE: Plan Change 10 Submission - Te Paiaka Lands Trust
Date: Wednesday, 4 May 2016 4:18:00 p.m.

Good afternoon Bill. Thank you for your email.

This is to confirm that the Bay of Plenty Regional Council received your submission on Proposed Plan Change 10 on 27 April 2016. Your submission was received after the closing date of the submission period ([4.00pm, 27 April 2016]) however the Water Policy Manager, under delegated authority, has decided to accept your submission pursuant to section 37A(1) of the Resource Management Act. It has been noted that you do not wish to be heard in support of your submission.

Under Clause 7(1) of Schedule 1 of the Resource Management Act 1991, staff will prepare a summary of all submissions and publicly notify its availability. A copy of the public notice will be sent to you. Any person (including you) will then have the opportunity to make a further submission in support of, or in opposition to, any of the original submissions.

If any change is required to your contact details, please let me know.

Thank you.

Regards

Sue

Sue Simpson | Planning Coordinator | Bay of Plenty Regional Council | Tauranga, New Zealand |
Ph: 0800 884 881 Ext. 8318 | Web: www.boprc.govt.nz
Please consider the environment before printing this email

From: Bill Young [<mailto:bill.young@clear.net.nz>]
Sent: Wednesday, 27 April 2016 4:46 p.m.
To: rules
Subject: Plan Change 10 Submission - Te Paiaka Lands Trust

Kia ora

Please find attached the submission for Plan Change 10 from Te Paiaka Lands Trust.
Any queries, please let me know.

Nga mihi,
Bill Young
Chairman - Te Paiaka Lands Trust

Sent from my phone

**This e-mail message has been swept for viruses and none was found.
Content was not checked**
