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To: [rules](#)
Subject: Submission Patricia Hosking
Date: Wednesday, 27 April 2016 1:42:39 p.m.

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

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

SUBMISSION

My property is a dry stock farm of 49 hectares with 35 effective. The 13 hectares which are not in pasture include retired land bordering the Waiteti stream (4 hectares) 4 hectares in forestry, fenced drains and trees and fenced erosion prone hill faces and a garden.

The property is surrounded by 11 lifestyle blocks and Ngongotaha and the railway track to the south.

A bridge provides access over the stream to the forestry block and 10 h in

pasture.

All buildings including sheds, yards, fences and house were built and funded by my off farm income. A calf rearing four bay shed was built in 2011. This latest development was to help make the farm more viable.

The farm is currently a bull beef and beef fattening unit. I purchase around 120 calves at 4 days old and take them through to slaughter by 20 months. My policy is not to carry stock through a second winter to minimise pugging, erosion and pasture damage in winter.

The property is well subdivided and the majority of the farm is been planted in improved pasture cultivars. Fertiliser is applied according to soil tests which are carried out most years. Nitrogen is used minimally and mostly applied to new grass only.

Cattle are break fenced behind an electric wire year round.

Silage is made in spring and fed out on the property in autumn and winter. Since owning the property I have planted thousands of trees for timber, shade and shelter and to provide food and a habitat for species of birds. All drains are fenced. All erosion prone hills are either permanently fenced and planted in trees or electric fenced to minimise damage by stock. No cropping is undertaken and no feed supplements are brought onto the property. The retired land within the stream area has not had stock grazing it since I purchased it.

The stream through the property is 2kms in length and has been fenced to exclude stock for around 35 years. The work surrounding the stream is huge and on going. The river regularly floods and flood waters erode the stream banks, damage fences and washed out the original bridge. The retired land was smothered by impenetrable weeds including barbary, gorse, blackberry, broom, budlia and convulvulus. I bought a PTO driven spray unit and have sprayed the entire length of the retired area most years. The weeds are now reduced but without yearly spraying the area quickly reverts to weeds again. It takes commitment, effort and cost to manage, repair damage and control weeds along the retired stream area.

As it is a small dry stock farm income from it is marginal. This is despite it being farmed intensively, being mortgage free, having previously funded improvements with off farm income and despite the recent improvement in beef prices.

My property currently has 20% of the total area permanently retired and unusable so it carries 20% less stock than if all land was in pasture.

My NDA does not recognised land in retirement. It requires that I reduce N leeching by 20% to 33.2kg N/h/yr. This is equivalent to increasing the unusable area a further 20% to a total of 40%. With 40% of my farm unproductive my property will be uneconomic.

My submission relates to all parts of the plan that allocate a nitrogen load and applies it as a fixed nitrogen discharge limit to my property

I 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

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 limits

1. I 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.

Reasons for my submission

1. Sheep and Beef 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 will restrict my ability to realise the long term land management plan for my property and to respond to markets.

2. The plan unnecessarily and unfairly restricts my 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 soil.
3. I 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

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