

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

SUBMISSION

120 ha Drystock Cattle/Deer

Situated in the Utuhina valley, on the City boundary.

Low intensity farm. Nutrient outputs have been reduced since Rule 11 Benchmarking. We have obtained a provisional Nitrogen Discharge Allowance as required by the Regional Council. We currently meet the 2032 targets applied to our property.

All stream banks and wet areas were retired under the then BOP Catchment Commission. No stock have access to waterways. Additional areas have been retired from stock and or planted out into wood lots.

The current proposed rules do not encourage alternative innovative land usage which may present themselves in the future.

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

Recent Science suggests that Phosphorous should be included as part of the Nutrient reduction plan. More science needs to be done in this area to either substantiate or dispel this recent scientific paper.

Reasons for my submission

We submit that Farming should be a Permitted Activity not Controlled. Dry Stock farming is extremely cost sensitive, thus any compliance costs with negligible benefits would place an additional burden on our already low cost farming system.

If the proposed plan comes into force a 5 year rolling average to Nutrient losses should be applied to allow for adverse events.

There should be a reassessment of targets after the 2017 Science review.

We oppose Nutrient Trading as this is contrary to the objective of reducing the total Nutrient losses into the Catchment.

There is no obvious reference as to where the credits will be apportioned when a portion of a title is converted from Pastoral to Residential Housing.

The confusing / changing advice / targets makes it difficult to make informed decisions.