



Submission form

Submission number
Office use only

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

Post: The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatāne 3158	or Fax: 0800 884 882	or email: rules@boprc.govt.nz
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Submitter name:

This is a submission on **Proposed Plan Change 10 (Lake Rotorua Nutrient Management) to the BOP Regional Water and Land Plan.**

- 1 I **could not** gain an advantage in trade competition through this submission. *[Delete as required.]*
- 2 The details of my submission are attached
- 3 I **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.]*

_____ 26/04/2016 _____

Address for service of submitter:

818D Paradise Valley Road

Telephone:

Daytime: 027 3575004

After hours:

Email:

michrennie@gmail.com

Fax:

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

Peter McLean, & Michelle Rennie, Paradise Farms 2012 Ltd

This is a submission on Proposed Plan Change 10 (Lake Rotorua Nutrient Management) to the BOP Regional Water and Land Plan.

I am an individual submitter and I wish to be heard as an individual.

My name is ___Peter McLean & Michelle Rennie, Pradise Farms 2012
Ltd_____

My address is___818D Paradise Valley Road, Rotorua
3072_____

My contact details are daytime phone_____027 3575004_____after
hours_____

Email address___michrennie@gmail.com_____

Fax_____

I have lived at this address for _____4_____Years and I own _____38.35___Ha of land.

I am not a trade competitor for the purposes of the submission but the Plan Change has a direct impact on my ability to farm.

I **wish to be heard** in support of this submission.

Background Information:

I have been involved in farming in the Rotorua lakes catchment area for 27 years.

I have seen a lot of change within this time to better the lake situation, and, as a fencer I have worked on a lot of farms – dry stock, dairy, organic, and seen and worked on creating their practical initiatives to re-zoning areas into planting and retirement taking place.

I support finding the right environmental solutions for Lake Rotorua, but the solutions must be fair and equitable across the **entire** community, not just a primary focus on the farming platform.

Our elected representatives on Council have chosen to notify the rules, even though the lake is already at the target level of N required.

There is legitimate concerns around the evidence, the science, the accuracy & enforcement.

My concerns with Plan Change 10 Rules are:

1. The Plan Change 10 Rules to be imposed on pastoral land owners are not fair nor equitable. The impact on our property will be –

- We have a situation that is extremely fortunate - a flat, high producing small farm on a plateau in the valley hills.
- We would align to a dairy farm in this respect
- We use maintenance fertiliser without nitrogen, no cropping, harvest silage – excess requirements are also sold
- This NDA allowance would effectively **halve** our stocking rate
- Our farm would be unsustainable within this quota
- We have already taken a 12% loss in RDC valuations, introducing such a structured approach will no doubt affect valuations further
- This impacts on income and viability for many farms. Remember the add on effect for those who's jobs are associated with the rural sector. Farm employees, agricultural contractors, fencing, fertilizer suppliers, transporters,

stock and station agencies, stock agents. Beyond this - Rotorua is a stagnant population, retail is in decline and all areas will suffer.

- The overseer model is flawed, previously a +/- 20% variance, now with the updated version the compatibility of data is corrupt and potentially outside this range.
- Where should appropriate percentile variances lie? What is acceptable.
- Are we to follow the NPS v RPS guidelines? Why is Rotorua Lakes proposal not inclusive of such.

2. The sustainable load to Lake Rotorua was first estimated in the early 1980's & has not been verified by actual scientific truth testing since then.

Being from a pharmaceutical background I request the recalculation of the sustainable load target to Lake Rotorua using a robust, evidence based, biodiverse system that encompasses both N and P and other relevant elemental factors that influence such.

Further, the recalculation of the nitrogen input from land use to the lake as part of a larger Science Review to be started in 2017.

3. I do not support the Policies, Method or Rules of Plan Change 10. I do not support the nitrogen discharge allowance process and the requirement that land owners reduce nutrient loss by way of regulation, it should be in collaboration with suitable persons involved in creating a benchmark, not consent.

I do not support the requirement for land owners to complete farm management plans that will be part of a compliance process.

I do not support BOP Regional Council micro-managing my farming business versus running a sustainable farming practise.

It is impossible to develop a plan committing ones self to actions up to 15 years in the future, who knows what environmental/ economic change may influence decissions. Can we predict degree of global warming, earthquake, volcanic matter? What other areas of the community are being asked this open ended question, or for that potentially held accountable.

This is a feasibility v impossibility argument of the future.

There must be recognition for previous retiring of land, the NDA proves no benefit for this and containment of N runoff.