



Submission form

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

044

Submission number
Office use only

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/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 attached.
- 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.]*

27 April 2016
Date

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Contact person: <i>[Name and designation if applicable]</i>	Andrea Hammond	

Submission to BOPRC – Proposed Plan Change 10 (Lake Rotorua Nutrient Management)
From Andrea Hammond

I oppose the proposed Plan Change to the proposed "Rules" (and the Rules themselves) for the following reasons:

- A major issue which seems to have been largely overlooked (or ignored) with regard to the question of stock numbers - at a very basic level, if they are reduced to the numbers proposed, there won't be enough to eat the grass that grows – this will lead to the growth of more weed species. There will be no way to manage this other than with the application of increased amounts of herbicides, and there is a significant cost (economic and environmental) to this.
- The number of stock on a property at any one time is NOT evidence of nitrogen output, and is thus unmeasurable and unenforceable – council staff have advised they are relying on neighbours to inform BOPRC of others who are carrying more than their “permitted” stock numbers – this is not a professional approach, nor is it one likely to succeed.
- There is no practical way for Nitrogen leached from individual blocks of land to be measured and therefore this cannot be enforced. The calculations carried out by BOPRC as to what these levels will be cannot be accurate. How does BOPRC propose determining what nitrogen has run off from a neighbouring property and what effect this will have on all other properties closer to the lake? How long does nitrogen (if applied as a fertiliser) take to leach through to the lake? Why isn't phosphorous being targeted first?
- There is no scientific evidence that the allocation, or the levels of the allocation will have the effect claimed by BOPRC staff. Further there is no practical way to monitor any such "allocation". Limiting stock numbers is a draconian, arrogant, overbearing approach - telling people who have worked hard to buy and maintain their properties and who enjoy their lifestyle that they will in effect be able to have a very large lawn with few animals is insulting and offensive.
- One of the stated ways to achieve a reduced level of Nitrogen entering the lake is by “voluntary removal of gorse” – surely this would be an easier STARTING point for the process, there is enough gorse on many large blocks to make an instant difference if it was removed.
- Small block owners are being unfairly targeted in this process – the economic and social burden is increased significantly on those with blocks of less than 40 hectares, especially as a result of a large decrease in land value. The threshold should be lifted to 40 hectares.
- There is no information on how nitrogen discharge from properties within the town boundaries (ie urban properties) is to be measured or managed. Or the nitrogen resulting from wildlife (especially birds), or from run off from roads etc. Rural property owners should not be expected to carry this burden on behalf of everyone who lives in the catchment.

I am not opposed to the objective of improving the quality of the water in Lake Rotorua. However, I am strongly opposed to the proposed plan change and the intention to dictate, in particular, permitted stock numbers for people on small, “lifestyle” blocks. I do not accept that the science provided by BOPRC sufficiently supports the proposal, nor that nitrogen output can be measured well enough from individual blocks of land to enable any enforcement of the “Rules”.

The proposed stocking numbers based on the table provided by council are questionable and display little understanding of what various classes of livestock actually look like. The size difference between some are nothing like what is indicated in the table, and the nitrogen (eg urine) output is hugely variable for a number of reasons. Again – there seems to be very little practical understanding by Council Staff.

I would strongly urge BOPRC staff to engage someone with a more practical view on the likely results if the Rules are implemented as they stand – look at the very basic issue of land management if there are no stock to eat the pasture. I would be confident that landowners will not be happy to plant their lifestyle blocks in forest and live under the trees.