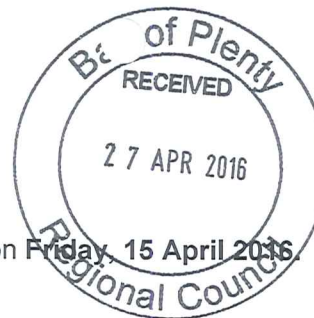




## Submission form



Submission number  
Office use only

Send your submission to reach us by 4:00 pm on Friday, 15 April 2016.

<b>Post:</b> The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatāne 3158	<b>or Fax:</b> 0800 884 882	<b>or email:</b> rules@boprc.govt.nz
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**Submitter names** NORTHDALE HOLDINGS LTD, Everard Developments LTD & R.W. Martin

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

- I ~~could~~/**could not** gain an advantage in trade competition through this submission. *[Delete as required.]*
  - I ~~am/am not~~ directly affected by an effect of the subject matter of the submission that adversely affects the environment, and
  - 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.]*
- The details of my submission are in the attached table.
- I ~~wish/do not wish~~ to be heard in support of my submission. *[Delete as required]*
- 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.]*  
*This is subject to reading other submissions*

*[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.]*

*20/4/16*  
Date

**Address for service of submitter:**

*437 Paradise Valley Rd Rotorua*

**Telephone:**

**Daytime:** *07 3489864*

**After hours:**

**Email:**

**Fax:**

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

*R.W. Martin (BOB) for all three submitter names*

## **SUBMISSION PLAN CHANGE 10**

### **Page 2 (1.2)**

The regional policy statement has set the annual limit of 435 tonnes of nitrogen entering L Rotorua, this is too high or the time frame too short. The TLI of 4.2 is being achieved faster than was predicted when RPS levels of rule 11 was set.

### **Page 4 (1-4)**

As of Dry stock areas of land it is not as intensive as dairy and the NDA of 13 11 loading 210 is unfair and is not achievable over 16 years. There will be considerable financial hardship on farmers unless stock prices are guaranteed at the start with inflation added per year.

Year requirements are a recipe for financial disaster.

### **Page 5 Programme Rules**

Why a Resource Consent by 1/12/17? Why not a memorandum of understanding and then a consent in 2031.

### **Page 6 (1.4.1)**

Incentive for Gorse. This will not work show trials and the loss of nitrogen is still a may be stage. 3kg – 38kg / ha/ yr.

### **Page 9 (1.6)**

The plan change has not included new objective or research rules, why not?

### **Page 12 (2.1)**

70% of the requirements (nitrogen) must be achieved by 2022 “why?” If not will council impose an abatement notice on the land and stop production.

### **Page 17 (Maori Land)**

25% of LRC is Maori Land (check your figures), What percentage is planted in pines and now growing gorse. It's the nature of the land and cannot be controlled.

### **Page 23**

The removal of Alum dosing must be renewed and it should be a long-term solution but controlled. It has improved the lakes TLI. Why is the Hamurana stream not being treated or channeled.

The Te Arawa trust also has a responsibility on cultural grounds and should have to contribute.

### **Page 68**

Ngati Rangiwehehi re: effects of Alum

What are the phosphate readings in the Hamurana River? This is nutrient management rule, not just nitrogen – Right?

**Page 194**

Cost to land owners over 40 ha

NMP's for farm                   \$254.00

Consent                               \$1200.00

1. The NMP cost is fixed t that price or that estimate?
2. The consent cost of \$1200.00 application fee fixed or not?

Should further consultation be required? Who pays for the qualified consultant?

**Example:**

We thought we had a signed and sealed Kaituna catchment agreement only to have Regional Council impose and administration targeted rate 20 years later. I don't trust your integrity.

The total cost to the landowner for compliance and on going updates is not acceptable.

**Page 231****Conclusion:**

The whole plan is based on Perfection. Mother Nature controls production on farms, the changing values of markets week by week and animal husbandry. I do consider that landowners have a roll to play but we are not the only perpetrators and the major benefit will go to the lake owners land values. This is tremendous cost to Rotorua financially and the short time frame will affect the city retail.

It may give us that lake water quality or 'which green image' for our tourists, whom mostly come from their own pollutant country or we see the demise of agriculture from Rotorua basin.

But never mind, more pines and more yellow pollen and more people with medical conditions.

Yours faithfully

R.W.Martin

***I wish to be heard.***