

Submission Form

To reach the CEO, Bay Of Plenty Regional Council, PO Box 364, Whakatane 3158 or email to rules@boprc.govt.nz or Fax to 0800 884882

No later than 4pm on Wednesday 27th April 2016.

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.**

I am making this submission on behalf of **Bushland Estate Limited** and **Adolle Farms Limited**

My Postal address of Adolle Farms Ltd is: 116 Jackson Road, RD6, Rotorua, 3096. The Physical address of Bushland Estate Ltd is: 60 Scott Douglas Drive, but the postal address is as above.

My contact details are daytime phone: 027 2323211. After hours: 07 3323211 _____

Email address: gisele.schweizer@xtra.co.nz _____

I have lived at the 2 addresses above since 1999. Bushland Estate owns 335Ha of land. Adolle Farms Ltd owns just under 15 Hectares.

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 make these comments as both the owner and director of Bushland Estate Ltd; a large dairy farm in the catchment, as well as on behalf of Adolle Farms Ltd; an affected large lifestyle block of a 14.3 hectare, (part of the McFetridge Subdivision), which has a benchmark allocated at a dairy level, and which was purchased specifically for, and is currently used as part of, our dairy farming operation pursuant to Rule 11. The dairy farm is 335 Hectares with 240 hectares currently effective and the rest in retired native bush. We also utilise 42 hectares of local, in catchment, dairy benchmarked lease land which we are at risk of losing currently due to these proposed rules. The farm employs and supports 5 families including my own. Many of the families we employ have young children who attend local schools or pre-schools. My family and I have lived on the main farm from 1999 until 2012 when we moved to the lifestyle block at 116 Jackson Road. My husband Peter and myself own and manage both the farm and lifestyle block and my 3 young boys have spent their lives growing up on the farm and the lifestyle block.

Bushland Estate is 335 hectares in total. Pre 2001 40 Ha was retired into native bush under covenants.

We have done the additional environmental good works since 2001:

- 6 Ha additional bush fenced
- Additional 34 Ha protected and maintained as native bush, including steep sidling's to avoid soil erosion
- Cropping has stopped in its entirety
- A new effluent system has been installed at a cost of over \$55,0000 including an entire newly lined pond
- We have increased the area of effluent disposal to 55 Ha from 25 Ha
- Spent over \$20,000 upgrading the sprinkler and pipes to reduce the application rate of effluent fertiliser onto land.
- Eradication of gorse
- Diversion of race water onto paddocks
- Pest control of deer, possum etc. to protect native wildlife

- Reduction of Nitrogen Fertiliser use
- Increased use of wintering cows off farm.
- Use of detention bunds

I personally have been fundamentally involved with trying to find the right environmental solutions for Lake Rotorua but the solutions must be fair and equitable across the entire community, and across more than one generation. I have sat at The Stakeholder Advisory Group [StAG] since its inception, and on various sub-committees as well. I was also a founding member of the Waiora Group that led to the signing of the Oturoa Agreement. I was also a founding member of the Lake Rotorua Primary Producers Collective [The Collective] and am currently Co- chair of that organisation alongside Neil Heather. I have worked collaboratively with the Council and all stakeholders in an effort to find a solution for lake Rotorua which would ensure that the TLI of 4.2 is maintained into the future, as I have been told that this is what will keep the lake at the 1960's level of cleanliness, which we are told is what the community desires. We are aware that the lake is currently at this level and it is indeed in a good state and so we accept the need to try and maintain this level of lake health for our families and communities today and into the future.

However we oppose these rules today as we do not believe that they will also ensure that the prosperous farming community which exists today will endure, and so we have grave concerns for the social, cultural and economic future of Rotorua if the rules are to proceed as they stand. The economic impact of these rules make it clear that some individual farmers will be destroyed and will be paying the price for a legacy of pollution into Lake Rotorua. However it is clear that it is not just these individuals who will suffer but the entire Rotorua Community.

We appreciate the opportunity to comment on PC10.

I commend the collaborative nature of the efforts of BOPRC to find a solution. Unfortunately following the termination of Stag, the rules seem to have taken on a life of their own and diverted down a path quite contrary to the intention and direction of travel of them when endorsed at StAG. Changes of staff, new staff being employed for the purpose of implementing these rules when they are still at this very early stage, have all contributed to this and highlighted the pitfalls and errors with the rules as they currently stand and have led me to have grave concerns as to the implementation, 'policing' and fairness of the rules framework developed at Stag and endorsed by BOPRC to date.

Our elected representatives on Council have chosen to notify the rules as they stand, even though the lake is already at the target level required & there are legitimate concerns around the evidence, the science, the accuracy & enforcement of these rules. I raised these concerns specifically when I spoke at a StAG subcommittee meeting on 24th September 2015, but unfortunately the rules were notified despite the concerns raised.

As members of both Federated Farmers and Lake Rotorua Primary Producers Collective we acknowledge & support their submissions in their entirety and rely on the relief sought within them.

My submission on Plan Change 10 includes but is not limited to the following:

1. The Plan Change 10 Rules as they currently stand are placing an untenable burden on our farming viability. We personally have recently received out benchmark on both properties which requires a 33% reduction on the farm and a 34% reduction on the lifestyle block. Unfortunately there has been insufficient time prior to completing this submission to obtain the necessary business advice to show whether this is possible. However with our current debt levels this reduction is almost certainly going to impose an impossible financial burden on the farm. If we are forced to sell the farm we are aware the capital value will also be decimated, if indeed we can find anyone to buy the farm at all. It is highly likely that our lifetime's work and investment will be destroyed as a result of these rules.
2. This is highly inequitable when it is borne in mind that the legacy issue is being imposed entirely on my family's shoulders. It is equally inequitable when account is made of the efforts we have gone to, (highlighted above), to try and improve the farm's nutrient discharge, and the further efforts we will

happily go to in the future if we can remain financially viable. Our business supports many families and other businesses in town so the knock-on effect is clear.

3. The rules are additionally unreasonable and inequitable when it is again borne in mind that the nutrients from our farm do not reach the lake for approximately 80 years, and that the rules as they stand will therefore not achieve the desired outcome for at least this time. And all of this when it is clear that there are other solutions involving combinations of N and P that will achieve the same goal of a clean lake but in a much shorter time frame, and without the draconian impact on individuals and the Rotorua economy as a whole. My family and I may lose our home and business in the next decade, but the benefits to the lake will not be seen for generations. It is common sense that the damage being done to this generation is avoidable and that there are other alternatives and solutions already visible today which are a win/win solution for the economy and the lake, as well as many more solutions which are likely to evolve through changes to farming systems and developing science.
4. 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. I request the recalculation of the sustainable load target to Lake Rotorua and the recalculation of the nitrogen input from land use to the Lake as part of a larger Science Review to be started in 2017.
5. 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. At StAG the framework was designed to avoid this, but following the end of StAG the rules have diverted into this pathway.

In conclusion, for the reasons outlined above and in the Federated Farmers and The Collective Submissions, 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, while there is so much uncertainty about the efficacy or necessity of those rules and while there is the clear possibility of an alternative way forward that will achieve the goal of a clean lake and a viable Rotorua economy, and avoid the cultural, social, and economic harm to myself and the greater Rotorua Community.

It is impossible to develop a plan committing myself to actions up to 16 years in the future, and if I were to do so now it would look very much like bankruptcy.

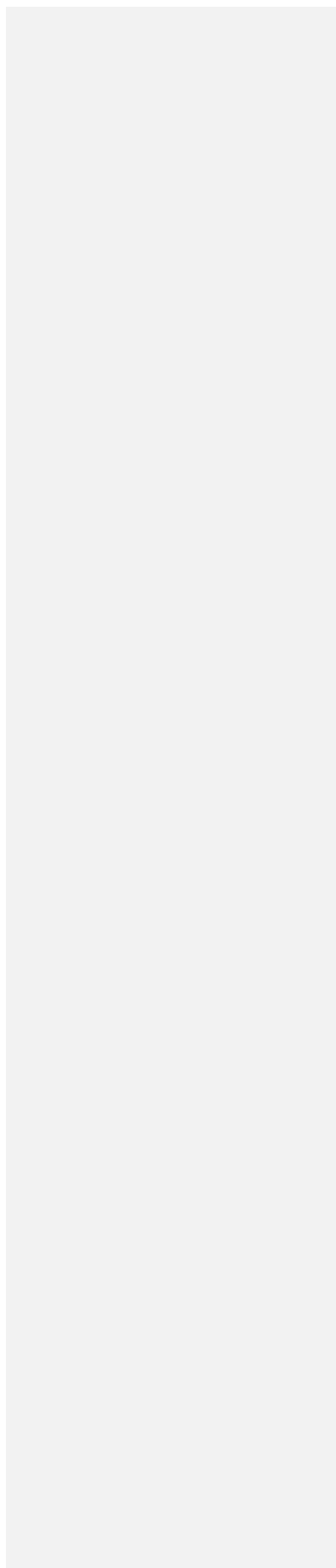
Thank you for consideration of this submission.



Gisele Schweizer
(On behalf of Bushland Estate Ltd and Adolle Farms Ltd)

Comment [GS1]:

Signed _____



From: rules
To: ["Gisele Schweizer"](#)
Subject: RE: PC 10 Sub- BEL and Adolle Farms - April 2016
Date: Wednesday, 4 May 2016 4:09:00 p.m.

Good afternoon Gisele. Thank you for your email.

This is to confirm that the Bay of Plenty Regional Council received your submission on Proposed Plan Change 10 on 27 April 2016. Your submission was received after the closing time of the submission period (4.00pm, 27 April 2016) however the Water Policy Manager, under delegated authority, has decided to accept your submission pursuant to section 37A(1) of the Resource Management Act. It has been noted that you wish to be heard in support of your submission.

Under Clause 7(1) of Schedule 1 of the Resource Management Act 1991, staff will prepare a summary of all submissions and publicly notify its availability. A copy of the public notice will be sent to you. Any person (including you) will then have the opportunity to make a further submission in support of, or in opposition to, any of the original submissions.

If any change is required to your contact details, please let me know.

Regards
Sue

Sue Simpson | Planning Coordinator | Bay of Plenty Regional Council | Tauranga, New Zealand |
Ph: 0800 884 881 Ext. 8318 | Web: www.boprc.govt.nz
Please consider the environment before printing this email

From: Gisele Schweizer [<mailto:gisele.schweizer@xtra.co.nz>]
Sent: Wednesday, 27 April 2016 4:26 p.m.
To: rules
Subject: PC 10 Sub- BEL and Adolle Farms - April 2016

**This e-mail message has been swept for viruses and none was found.
Content was not checked**
