

## **Submission Form**

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

**no later than 4pm on Wednesday 27<sup>th</sup> 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.

Our name is Jamie & Chris Paterson

our address is 136 Stewart road RD 6 Rotorua 3096

our contact details are daytime phone Home 07 3322818 or 0274545493 after hours 3322818

Email address [chrisjam@xtra.co.nz](mailto:chrisjam@xtra.co.nz)

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

We wish to be heard in support of this submission.

I acknowledge the submission from Federated Farmers, Lake Rotorua Primary Producers Collective and my fellow individual Collective members.

We have lived on our farm for 20 Years, we are the classic NZ farmer that progressed through share-milking by going to bigger jobs and purchasing more cows until we had enough savings and capital asset to purchase our first farm of 60 ha. We took the opportunity of doubling the farm in 1996 when we purchased 120Ha of land and created a beautiful dairy farm that now supports ourselves as owners, our contract milkers, 2 adults and 2 children and employs a local youth who is training through ITO.

We have hosted many over seas visitors over the years, all really keen to learn about the NZ way of farming including the Director General of Agriculture for Italy.

Activities we have undertaken since 2000 to address nutrient loss from our property-

- built and rubber lined a new 60day effluent storage pond
- doubled the size of the effluent application area
- stocking rate has been reduced from
- All young stock are grazed off from 12 weeks of age
- all gorse eradicated
- several erosion proned hill faces have been planted in trees and stock excluded
- stock crossings have been installed along the length of a creek bed
- drains have been fenced to exclude stock
- A detention dam has been built in conjunction with BOPRC to participate in trial work and to retain particulate phosphorus.
- Participated in research growth trials with Ballance for Nitrogen inhibitors
- planted shade trees for stock and birds.
- Use of small flood flow hollows in water path to capture particulate phosphorous

Areas of Concern with Plan Change 10:

- Targets: Rotan was first run in 1986 and has not been recalculated since to reflect current land use nor farming systems. Both the sustainable load to the lake and the load from the land must be newly established before any rules are put in place.
- The lake has met the target set by the community for the last 5 years. It is phosphorus control that has enabled that to happen not the control of nitrogen.
- Massey University has just released relevant research on Attenuation which has changed all the past understandings about the catchment and the loss of nutrients from source on farm to the lake. That there is Attenuation now means that there are new options to mitigate nutrients between source and the lake.

- Council needs to stop and take stock of the new science before proceeding with any plan change
- In lake loading: TeArawa Strategy partners must take responsibility for addressing the effect of the bottom sediments in lake Rotorua. It is a futile plan to remove hundreds of tons of N from land and bankrupt a whole farming industry when the lake can generate just as much herself given the right conditions.
- It is not fair nor equitable that we are given only 15 years to correct a problem that was a 100 years in the making.
- Why are current land owners being held accountable for nutrients in ground water from a previous generations use. The average age of water arriving at the lake is 60 years.
- We do whole hearted support a science review being undertaken in 2017 but it must be a recalculation and re evaluation of all current thinking by a new and independent science team. Council have relied on the same source for all information for many decades, a review means a fresh pair of eyes and a new way of looking at the issue or problem.
- That the science review scheduled for 2017 includes a new calculation of the sustainable load to lake Rotorua and that the nutrients generated from all current land uses is newly calculated. Our real concern is that the target load has been 'taken as read' since its inception.
- That both nitrogen and phosphorus loading levels are considered together within the integrated framework outline suggested in this submission. That nutrient reduction takes account of all the science knowledge, and a greater emphasis is placed on the total bio diversity of catchments.
- That the principals, policy's and methods of the RPS are applied in assessing the economic impacts on individuals and community of the integrated framework.
- That sub-catchment groups are established, driven by community & supported by Regional Council.
- That Council acknowledge the effect and focus on mitigating the legacy internal lake loads.

Page two

Council must quantify the claim to 'best science available', my understanding is this best science was done in 1986 and has not been recalculated since, only reviewed with the same inputs. Best science is a subjective claim and not substantiated by qualifications.

Plan Change 10 is definitely not adaptive management, it uses regulation and control, and prescriptive measures to micro manage every aspect of our business.

The NPS-Freshwater lays down very specific policy requirements not least that limits are only set after iterative analysis of options, costs and achievability. Plan Change 10's main focus is on the single element of nitrogen when Council has several reports on file stating that to maintain the target TLI of 4.2 Council will have to focus on phosphorus, and that there are options around the levels of N & P that the lake will sustain.

#### **Table LR1 Lake Rotorua Integrated Framework – annual catchment loads and reductions:**

We do not support the integrated framework until such time as the catchment load and the sustainable load is recalculated by either Rotan or its replacement.

#### **Table LR2 Pastoral Farming sector proportional reductions**

We question the fairness and equity of dairy farms having to reduce nutrient loss from their land by 35%. This was calculated by figures used in Rotan with completely different input protocols to the ones our businesses are subject to today, that do not include attenuation, but do include nutrients from rainfall that we have no influence over or opportunity to mitigate. We are concerned that if these figures are not accurate then all the calculations around the allocation process are also incorrect.

We further question the accuracy of the 'degree of pain' shared across the farming sectors. It is concerning to hear of a significant number of dry stock properties that will have to take very minor actions to meet their 2032 NDA's when nearly all of the dairy farmers will face devastating consequences to the economics & viability of their businesses.

**PC 10 Objectives:**

We question why farmers are being forced into a consented regulatory process to meet objectives that have already been met. The target TLI of 4.2 has been met for some years, and Council's own commissioned reports show that the long term trend is that the water quality is improving.

The main point of debate is that this target is met through the use of alum, a natural product being drip fed into the lake to control phosphorus. It is the control of phosphorus that has improved clarity and reduced the threat of algae blooms. The lake is still receiving 658t N annually and coping with it. The real issue is the inlake loading and the legacy ground water which we have control over.

**PC 10 Policies:**

The policies are to give better effect to the objectives of the RPS and RWLP. These documents already have a number of policies that cover the requirements stated in the 17 policies recorded here. The fundamental objective is to meet the TLI target of 4.2 so these policies can only enable that requirement. They must not be prescriptive beyond that intent.

**Rules:**

- That the implementation of the proposed rules be deferred until a review of all options to enhance catchment Nitrogen attenuation, what areas and sub-catchments are more responsive to such actions. (these results can feed into s32 in 6 above) Each sub catchment needs its own catchment action plan drawn up and managed by stakeholders within the catchment.

**From:** rules  
**To:** ["Chris & Jamie Paterson"](#)  
**Subject:** RE: Plan Change 10 submission  
**Date:** Wednesday, 4 May 2016 4:17:00 p.m.

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Good afternoon Jamie and Chris . 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](http://www.boprc.govt.nz)  
*Please consider the environment before printing this email*

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**From:** Chris & Jamie Paterson [mailto:chrisjam@xtra.co.nz]  
**Sent:** Wednesday, 27 April 2016 4:22 p.m.  
**To:** rules  
**Subject:** Plan Change 10 submission

Please find attached a submission to Plan Change 10.

Christine Paterson

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

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