

Further Submission on Lake Rotorua Nutrient Management - Proposed Plan Change 10

FS 07

Clause 8 of Schedule 1, Resource Management Act 1991

Please send your submission to be received by **4:00 pm, Monday, 1 August 2016.**

TO: The Chief Executive
Bay of Plenty Regional Council
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Whakatāne 3158

FAX: 0800 884 882
EMAIL: rules@boprc.govt.nz

Name: Alistair and Sarah Coatsworth

[Full name of the person or organisation making the submission]:

This is a further submission in support of or opposition to a submission on Lake Rotorua Nutrient Management - Proposed Plan Change 10 to the Bay of Plenty Regional Water and Land Plan.

1. We wish to be heard in support of our further submission.
2. If others made a similar submission, I would not be prepared to consider presenting a joint case with them at any hearing.
- 3 We are
 - *representing a relevant aspect of the public interest, as we will be directly affected by Plan Change 10*
 - *persons who have an interest in the proposal that is greater than the interest the general public has, as we are land holders in the Lake Rotorua Catchment and our business' will be affected by PC 10.*

Address for Service *[Provide full postal details]:*

Telephone:

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

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Sarah Coatsworth

FURTHER SUBMISSION POINTS:

Submission number <i>[Submission number of original submission as shown in the "Summary of Decisions Requested" report]</i>	Submitter name <i>[Please state the name and address of the person or organisation making the original submission as shown in the "Summary of Decisions Requested" report]</i>	Section reference (Submission point) <i>[Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposed plan change]</i>	Support/oppose	Reasons <i>[State in summary the nature of your submission giving clear reasons]</i>
12	Astrid Coker	12 – 4	oppose	We oppose all rural properties having the same nitrogen discharge/ha/yr. Extensive analysis was undertaken by Council and affected parties to find an allocation system that would allow for the majority of land owners to continue their current farming practice. It was found that sector allocation was the only way for dairy farming to remain in some way in the catchment.
17 70 48	D & A Trust The Fertiliser Assn of NZ Parekarangi Trust	17 _ 4 70 - 1 48 - 29	Support Support Support	We endorse all comments made with respect to the Section 32 report and support the requested decision sought of an independent, peer reviewed and objective s32 report be prepared that does not have predetermined outcomes. S32 report does not provide examination of the proposal in terms of its appropriateness in achieving the purpose of the RMA Policies & methods have not been examined for their efficiency, effectiveness & risk. PC 10, RPS, LWAP have failed to address the economic and cultural well-being of the community. The only consideration has been water quality. No full economic analysis has been completed. There has been no analysis of the effects of the rules on individual farm business nor acknowledgement of existing investments. Decisions report on the RPS recorded that cost-benefit analysis was at a 'conceptual' level and that PC10 s32 report records that it is intended as a 'record of the policy journey' not a rigorous cost-benefit analysis of options.
17	D & A Trust	17 - 5 17-9	Support oppose	The implementation of any rules must be suspended pending the findings of a comprehensive independent review of the water & land science for Lake Rotorua & catchment. All land has the ability to contribute nutrients to the environment

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24	JT & SA Butterworth	24 – 11	Support	Agreed that the General Community did not (when originally surveyed) and still does not have understanding of the economic & social impacts of this proposal. Agreed that Council suspend implementation of Rules until other viable options for nutrient reduction are explored.
24	JT & SA Butterworth	24 – 12	Support	Council need to take account of the reports it has commission even when they don't like what they say. The Farmer solutions project estimated the cost to the community of this proposal at \$88million but this fact has never been discussed in the public arena. The review of this report also states that farming will be decimated by this proposal but Council has chosen to ignore all feedback and professional reporting to pursue this Rules based approach.
24	JT & SA Butterworth	24 – 15	Support	The most effective approach to lake nutrient issues is to tackle phosphorus in the short term with a longer term commitment to reducing nitrogen loads, like the average lag time for ground water reaching the lake, 60 years. Significant resources need to be invested in the research of effects of Alum use both within NZ and overseas.
27	Gro2 Ltd	27 – 1 – 11	Support	The Collective endorse all the comments made especially number 10. Council knows these statistics but has chosen to make farming the political scape goat as they are small in number. There are significantly less animals in the catchment today compared to the late 60's. The control of the lake level by the weir certainly impedes the natural flushing that would normally occur following heavy rain and means the high buildup of sediment from years of city effluent discharge cannot be naturally dispersed. Rather than control by way of Rules, work with land owners to make improvements, accept that controlling phosphorus by way of detention dams will prevent erosion, eliminate flooding & stop soil reaching the lake. BOPRC have presented no evidence that current farming systems are contributing nutrients to ground water. All targets for the lake were calculated on the assumption that there was no Attenuation. This has been proven to be oh so wrong!! It is also a work in progress and there has been no truth testing of any science assumptions within the catchment so all calculations are best guesses. How will Council defend compliance notices for such figures? Work with land owners to capture nutrients along the pathways!

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26	Rotorua Lakes Council	26 – 10	Support	<p>The Collective endorse all comments made. PC 10 does not give effect to Policy WL 6B or WL 5B of the RPS under section 67 of the RMA. Rural production land use activities are being required to reduce more than is reasonably practicable using on-farm best management practices.</p> <p>This is not equitable balancing of public and private costs</p>
37 53	Ngati Whakaue Tribal Lands Incorp Lachlan McKenzie	37 – 3 53 - 1	Support support	<p>Agree that a catchment landowner/stakeholder group participate in the science review process and have input into the terms of reference and the development and implementation of recommendations. The results of the review will direct Council in changes to the RWLP & RPS.</p>
37	Ngati Whakaue Tribal Lands Incorp	37 - 8	support	<p>Reference files are averages on averages calculated using defaults. There is very little science involved. Reference files have been created outside of the Overseer program by BOP Regional Council and their independent contractors. This process has not been proven or used anywhere else. It has been designed to save time and money for Council but this calculation updates a property bench mark which is a very significant point every time Overseer goes through a version change. Every Kg of Nitrogen per hectare means a lot to land owners.</p>
34 53	Chris Sutton Lachlan McKenzie	34 – 2 53 - 4	Support support	<p>The Rotorua Community stated very strongly when District council did their eastern and western district consultations that they did not want to look out at a sea of pine trees located within the caldera. Regional Council have never asked the community what they would like to see in their caldera, but they are driving land use change to trees. Science is telling us that the lake is P limited. Forestry will deliver huge quantities of P to the lake at harvest & up until canopy cover is established (5yrs or more) that will significantly alter the N:P ratio and in fact encourage Algae growth in the lake waters. You could end up having to dose the lake with Nitrogen!!! Work with land owners to establish stream sub-catchment plans combining to form the total Lake Rotorua Catchment plan.</p> <p>Complete an independent review of the implications to the lake of significant land use change to pine trees having regard to N:P ratio.</p>

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29	WB Shaw & SM Beadel	29 – 3	Support	Collective agrees an overall vision of what will comprise sustainable long term land use across the lake catchment is lacking. The NPS-FW consultation with Community has not been done for Lake Rotorua. It is essential that the whole community living in Rotorua today have the opportunity to state what their values and objectives are for their community.
37	Ngati Whakaue Tribal Lands Incorp	37 – 6	Support	
41	Craig Hurst	41 – 3	support	That the science review for 2017 includes an independent calculation of the sustainable load of nutrients to Lake Rotorua.
62	Sharon Morrell	62 – 6	Support in part	Agree with the support of sub catchment land-care groups to facilitate local cross- sector / community collaborative efforts to improve the Lake but wish to do this outside of a Rules framework.
62	Sharon Morrell	62 – 3	support	Remove the clause about effluent management needing to be in the management plan, this is absolutely covered by individual effluent discharge consents.
48	Paerekarangi Trust	48 – 26, 28 48 – 1, 30	Support Support	The Collective support the TLI index of 4.2 for Lake Rotorua Plan change 10 has been developed on the premise that the TLI for Lake Rotorua would continue to increase based on modelling (ROTAN). Such models are poor predictors of lake water quality, with actual TLI confirming this, showing a steady decline since 2005, long before Alum dosing started. There is no evidence to support the sustainable nitrogen load of 435 TN/year when the steady state is up to 755 tonN/year and the TLI target is being met. The Collective fully endorse the alternative options suggested. i.e. by 2022 all farmers achieving best practice as defined by their industry body. By 2022 if TLI continues to achieve a 5yr average of 4.2 then no further N or P reductions are required on farm. If the 5 yr. average exceeds 4.2 then new NDA's are set subject to advances in science & technology, that ensure farmers profitability & viability.