

Chairman Commissioners to Plan Change 10 of Bay of Plenty Regional Council

Dear Sir,

I am writing on behalf of the members of the Rotorua Farmers Collective to respectfully request that the Commissioners appointed to hear the verbal submissions to Plan Change 10 consider deferring the hearing. We did send this request to the BOP Regional Council but they have replied to advise that the matter now lies with the appointed hearing panel.

All submitters to Plan Change 10 have stated the same point. Lets do this job well the first time and do it fully informed of all 'current' understandings and influences on this lake and this district. You can not dispute that Lake Rotorua has reached the Community target TLI of 4.2 and has done so for some years, this was achieved before lake side sewage reticulation was effected & before land owners fully understood the nutrient cycle from land. What we are saying is we have time to get this right.

There are still quite a number of matters not concluded that will inform this debate further and are extremely relevant to any decisions to be made.

Land owners are currently completing Farm Management Reports which contain 'current state' information. This information has never been known and in fact is showing that most of the commercial land holdings have managed to reduce the property nutrient export considerably. They are all showing that they are heading in the right direction voluntarily. Current state information is needed to fully inform analysis of the catchment contribution to the lake.

A great number of submitters requested that Council work with land owners to explore the potential capture of nutrients from the transport pathways to the Lake within the sub catchments. In fact Council's original plan recorded in the 2009 Action Plan was to address the nutrient issue by working in sub catchments. Scientists recently conceded that Lake Rotorua is Phosphorus limited and it is the capture and reduction of this element that is needing to be addressed.

Analysis of these catchments show huge potential because of the smaller number of land parcels & shape of the catchments narrowing down into necks before reaching the lake.

New science on the effectiveness of wet lands, filtering strips and detainment bunds is still being calculated.

Sub Catchments will enable efficient and cost effective ways of capturing and filtering further nutrients from storm flows before they reach the lake. Council has just appointed an Integrated Catchment Manager experienced in working with land owners to make this happen. Further time is needed to explore the gains to be made from these actions.

We are extremely anxious to progress sub catchments & review the plantings of existing ones and have had an initial meeting with Council Management to establish a working group to drive the process. Getting farmer buy in will depend on Council strategy.

Council have undertaken to complete an independent review of all science informing the water quality debate in 2017. Just in this last year the science understanding of the lake has changed and the scientists themselves say further work is needed to explore this new knowledge. The outcome from this review is also extremely relevant to any actions Council should consider.

The results of the reworked ROTAN model are extremely critical to the science review. The targets currently understood were calculated in old versions of Overseer and before attenuation was understood. The Community needs to see this peer reviewed work and have time to understand and explore it. We understand it is hoped it may be available in late October. This does not give sufficient time prior to the hearings to consider this information.

There has not been a full economic impact assessment completed on the effects of Plan Change 10 on land owners within the district and the flow on effects this will have on our immediate district. Rotorua Lake District Council have written to Regional Council and expressed their concern that this has not been done.

Imposing unfair and unnecessary 'Rules' on hundreds of landowners and the resulting enforcement and compliance programs that will come with them, when there is still much to settle and work still to be done, does not benefit this community, and is at odds with an enabling and collaborative working relationship.

We would prefer to work together with the Council on trying to find cost effective and enduring solutions rather than wasting our time and this community's money on extended litigation contesting Council's decisions.

The executive offered to meet with Council to discuss this request further but to no avail. I look forward to hearing from you.

Kind regards

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