



## Submission form

Submission number  
*Office use only*

<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 name:**

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

- 1 The details of my submission are in the attached table.
- 2 I **wish** to be heard in support of my submission

\_\_\_\_\_  
[Signature of person making submission or person authorised to sign on behalf of person making submission.]

*Date*

[NOTE: A signature is **not** required if you make your submission by electronic means.]

**Address for service of submitter:**

Bay of Plenty Regional Council

**Telephone:**

**Daytime:** 0800 884 880

**After hours:** 0800 884 880

**Email:**

info@boprc.govt.nz

**Fax:** 0800 884 882

**Contact person:**

Fiona McTavish, General Manager Strategy and Science

**SUBMISSION POINTS:**

<b>Page no.</b>	<b>Reference</b> (e.g. Policy, rule, method or objective number)	<b>Support/oppose</b>	<b>Decision sought</b> Say what changes to the plan you would like	<b>Give reasons</b>
13 & 14	Rules LR R4, LR R5 and LR R6	Support with amendment	Replace ' <i>[date of notification]</i> ' references with 29 February 2016.	The text ' <i>[date of notification]</i> ' needs to be updated to include actual date of notification.
14	Rule LR R7	Support with amendment	<p>Add condition c)</p> <p>There is no increase in effective area or nitrogen inputs from 29 February 2016 that may contribute to an increase in nitrogen loss onto, into or from land.</p>	<p>This condition aligns with the conditions in other permitted activities in Plan Change 10, (see Rules LR R1(a), Rule LR R4(c), LR R5(a), LR R6(b)) and should have been carried through to Rule LR R7. Through oversight it was omitted in the notified version of the Plan Change.</p> <p>The intent of Rule LR R7 was to allow higher nitrogen loss land uses to move to lower nitrogen loss land uses without requiring consent.</p> <p>This intent is substantiated in the Section 32 report stating LR R7 has the “added benefit that landowners opt to change their land management</p>

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				<p>practices in order to comply with this rule, rather than applying for consent” [p96].</p> <p>Without this condition, an unintended consequence could be low nitrogen loss land use activities would be allowed to increase their nitrogen loss rates. This would be inconsistent with the treatment of other permitted activities.</p> <p>If a landowner /operator chooses to increase their nitrogen loss, they can apply for consent.</p>
30	Schedule LR R5 – Use of OVERSEER and Reference Files	Support with Amendment	<p>Change number references from Part A.6</p> <p>To read</p> <p>The relevant land uses and areas, Nitrogen Discharge Allowance and Managed Reduction Targets as percentages of reference files will be included within consent conditions (LR R8(a), LR R9(a), LR R10(b), consistent with Table LR 8 below.</p>	The notified plan change uses incorrect referencing to rules in the Plan Change. This is an error due to referencing in earlier versions of the plan change not being updated to the notified version.