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The Chief Executive Officer  
Bay of Plenty Regional Council  
P.O. Box 364  
**Whakatane 3158**

**Re: This is a submission on the Proposed Plan Change 10 (Lake Rotorua Nutrient Management)****I wish to be heard in support of my submission.**

Since 1922 the Heather family has owned a farm in Paradise Valley. It has been run for three generations with each generation adding to the original land holding. The total area is 325 hectares of that 250ha is effective due to the significant environmental works and retention of native bush that has been undertaken over the last 94 years with a significant amount having been done in the 1980's to protect the Ngongotaha and the Umuroa stream and ultimately Lake Rotorua. I now farm the identity under my own right.

Being proactive environmentally over all these years has had a negative impact on my business income.

1. Environment work carried out prior to Rule 11 2001-2004 was not taken in to account when I was given my Rule 11 benchmark even though the lake was 30 years better off for me having undertaken this work.
2. Recently after a heavy rain event which highlighted problem areas on the farm as far as storm flow goes I spent upwards of \$ 30,000.00 installing detainment bunds as well as ponds to capture the storm runoff.
3. What this shows is that the landowner does not understand the flood-flow particulate nutrients, attenuation processes and pathways and the increasing likelihood of P-limitation in the lake.
4. The problem with PC10 is the BOPRC is singularly focussed on one nutrient that being Nitrogen at the expense of phosphorus which seems to be the limiting nutrients at the moment for Lake Rotorua.
5. Having carried out the fencing of .8ha gully since 2004 and planting it into natives which gives me no financial return in the future I was alarmed to find out that having retired that area had actually increased my nitrogen leaching on the remaining effective area even though for phosphorus and biodiversity it was a win win.
6. Due to the nitrogen increasing on my remaining effective area as I pointed out in 5 above it is not possible for me to do anymore of that kind of environmental work when PC10 is all about Nitrogen.
7. I strongly suggest the Council parks PC10 and works with the catchment farmers in prioritising sub-catchments delivering significant nutrient loads to the lake; assisting sub-catchment communities in developing sub-catchment action plans to prioritise critical source areas significant at sub-catchment scale, and cost effective interventions for reducing

high nutrient base flow and flood flow loads to the lake; and that these interventions would appropriately be considered by the Incentives Fund.

8. I support a rules framework for “capping” nutrient discharges; and that these rules should include properties not previously included in Rule 11, in order to guard the gains we have made to protect against going backwards. This includes under 5 hectares.
9. That the Council needs to acknowledge the significant shifts in science, including the significance of internal bed nutrients.
10. That the Council acknowledge the significant shifts in load estimates from Overseer version 5.4 to version 6.2 alongside recognition of catchment attenuation; that Rotan estimates of catchment loads are currently being revised; and that this revision will necessitate review of the RPS load numbers and load reduction targets.
11. That the Council acknowledge the 2017 Science Review is intended to review and update all the changes in the science and technical context; and that this may necessitate review of the RWLP TLI objective and/or the RPS load reduction target.
12. That the Council re-prioritise resources to invest in independent co-ordination and increased land management team support for the development of sub-catchment Action plans; based on the successful project like they did in the years 1990 to 2000.
13. That the Council confirm its rejection of prescriptive input-based management; and accordingly, remove all references in the rules to prescriptive management of farm plans.
14. That the Council confirm that the Rotorua Lakes WMA scheduled for 2020 is intended to give effect to the NPS-FW 2014; that this policy will be informed by the results of the Science Review; and that this process will include review of values, objectives, limits and methods preliminary to a further RWLP Plan change.
15. That the Council gives equal weighting to the four principles of the Resource Management Act – those being social, cultural, economic and environmental which to date has not transpired.

As a member of Federated Farmers and the Lake Rotorua Primary Producers Collective I fully support their submissions in their entirety.

**Neil Heather**