



Lake Rotoiti Community Association Incorporated

Registered Charity CC11386

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6th February 2011

Submission to Bay of Plenty Regional Policy Statement 2010

Lake Rotoiti Community Association Inc. ("LRCA") is pleased to submit to the Bay of Plenty Regional Council's ("BOPRC") Proposed Bay of Plenty Regional Policy Statement ("RPS") – November 2010.

LRCA recognises the diversity both of the Bay of Plenty Region and the Proposed RPS and intends to confine its submission to issues that are of particular concern to it.

Water Quality and Land Use

LRCA further recognises that the Draft (Proposed) RPS is a significant document under which other documents will be required to implement rules and actions required to achieve water quality improvements in the Rotorua lakes. It is of concern however that the impending Rotorua District Plan will most likely become operational prior to the RPS achieving similar status.

The implication is that whilst now being well aware of the impact of Lake Rotorua on the water quality of Rotoiti, and notwithstanding the current improvements to the main body of Lake Rotoiti since the implementation of the Ohau Diversion Wall, any longer term enhancements will be greatly reliant on actions to reduce the nutrient loads discharging from Lake Rotorua. These discharges are presently having a pronounced adverse effect on the Okere Arm and to a lesser extent the Kaituna River.

There is a significant view in our community that this may only be achieved through Planning changes which provide for existing agricultural land use to be converted to more eco-friendly applications such as retirement of dairy farms and/or enforcing "best farming practices", to minimise nutrient discharges.

Objectives

Objective 28 (page 76)

- *Enhance the water quality in the lakes of the Rotorua district and other catchments at risk*

LRCA would like to see this objective include more specific limits on contaminants, albeit that Policy WL3B proposes to establish limits of contaminants. We concur with the proposed amended wording suggested by the Rotorua Lakes Community Board in respect of Objective 28.

Objective 29 (page 76)

- *Land use is:*
 1. *within the capability of the land to support the use, and*
 2. *integrated with the wider environmental values of its surroundings, and*
 3. *within the capacity of its receiving water to assimilate any discharge*

LRCA supports this objective.

Policies

Policy WL 1B Facilitating Land Use Change (page 122)

LRCA supports the policy but wishes to see a wider definition incorporating rural subdivision, tourist activities and low nuisance industrial activities.

Policy WL 2B Defining Catchments at Risk (Page 122)

LRCA supports the definition of the Catchments at Risk but wishes to see the TLIs of each individual lake included in part (a) of this Policy. These TLIs have been derived from extensive public consultation and scientific research.

Policy WL 3B Establishing contaminant discharge limits for catchments at risk (Page 122)

LRCA supports this Policy but wishes to see the sustainable load estimates for lake catchments included for those lakes that have such estimates appropriately defined. Such inclusion of detail will give clear direction to the Rotorua District Council District Plan in respect of allowing land uses that will achieve the maximum stated exports.

Policy WL 4B Requiring Consent for Increased Discharges (Page 123)

LRCA supports the requirement of consents. LRCA opposes the lack of recognition of Rule 11.

Policy WL 5B Allocating Nutrient Discharge Levels (Page 123)

LRCA supports this policy but opposes the fact that the issuing of consents is not associated with this policy.

Policy WL 6B Managing the Reduction of Nutrient Discharges (Page 124)

LRCA supports this policy and the nomination of 2019 for the Lake Rotorua Catchment. However our Association objects that all the other Rotorua Te Arawa Lakes are not included within the requirement to be compliant by 2019 and requests that these lakes be included

Policy WL 8B Providing for Regular Reviews of Regional Council Consent Conditions

LRCA supports this Policy

Policy WL 9 B Managing Rural Development and Protecting Versatile Land

LRCA is most concerned with the wording:

“In the catchments of the Rotorua Te Arawa Lakes land-use change to achieve reduced nutrient discharges may justify over-riding this policy”

LRCA believes there should be no justification of retention of unmitigated intensive agriculture.

3.2.1. Directive Methods Method 1: District Plan Implementation (Page 131)

Policies WL 1B and 6B are missing and should be included herein. Additionally Policies WL 7B and WL 8B should be included.

LRCA believes that Policy WL 6B should be included in Section 3.2.1. Method 3.

The Way Forward

LRCA is concerned as to when and how meaningful progress to necessary land-use changes, in order to improve water quality in the Rotorua Lakes, and most particularly Lake Rotorua, is going to be achieved. We are concerned that the Rotorua/Rotoiti Action Plan (non statutory) immediate review requested by RDC is deferred by lack of funding.

LRCA is interested to note that the LUF Board seeks progress to alleviate uncertainty about future land management policy. It would appear that the ball lies firmly in the court of BOPRC to instigate strong meaningful initiatives to drive this matter forward.

LRCA requests the opportunity to speak to this submission.

Hilary Prior
Chairperson

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