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30 March 2026

Chief Executive
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Submission to Bay of Plenty Regional Council Draft Annual Plan 2026/27

Optimising Regional Benefits from Council Investments

Re: Establishment of an Adequate Budget for the Retention and Remediation of the Ōhau Channel Wall

1. Introduction and Purpose of this Submission

The Lake Rotoiti Community Association (LRCA) is a long standing bona fide organisation representing a wide community of interest. As concerned members and advocates of the lake community, we make this formal submission in the context of BoPRC Draft Annual Plan 2026/27 consultation, specifically regarding the restructuring of Council's $3.14 billion investment portfolio.

We acknowledge the Council's consideration of long-term investment structures — including the preferred Hybrid Model (Option 3. However, this submission focuses on an urgent and immediate priority: **the allocation of a substantial, fit-for-purpose budget for the retention and remediation of the Ōhau Channel Wall.** We respectfully submit that this must be explicitly identified and protected within any investment or funding framework the Council adopts.

2. Background: The Ōhau Channel Wall and its Critical Role

The Ōhau Channel Wall was constructed to prevent the inflow of nutrient-rich Lake Rotorua water into Lake Rotoiti. Since its commissioning in 2008, it achieved measurable success — Lake Rotoiti's Trophic Level Index (TLI) improved to approximately 3.4 by 2014, thereby within its target range of 3.5.

However, corrosion of the wall's structural elements was discovered in 2014. Since that time, Rotoiti's TLI has trended back upward to 3.8, algal blooms have increased in frequency, and water clarity has declined. Satellite images now show algae plumes entering the main body of Lake Rotoiti through breaches in the wall. The extent of structural degradation of both king and sheet piles is currently under review to determine best options for short and long-term remediation.

Total Nitrogen loads in Lake Rotorua remain approximately double those in Rotoiti and have not materially declined since 2000, meaning the wall continues to perform an indispensable function in protecting Rotoiti's water quality.

3. Why This Submission is Timely and Necessary

The Council adopted a Dynamic Adaptive Pathway Plan (DAPP) at its August 2025 meeting, with a $1.9 million budget for further trials and inspections over 12–18 months. While we acknowledge Council's rider that work be conducted 'expeditiously', we remain deeply concerned that:

- The DAPP budget is a planning and assessment allocation only — it is not a remediation budget. Without a committed remediation budget, further deterioration may continue unabated during the investigation period.
- Eleven years have already elapsed since the initial discovery of corrosion in 2014. Community frustrations are acute, and the cost of remediation will continue to escalate with further delay.
- BoPRC's Annual Plan consultation presents a pivotal opportunity to embed a long-term funding commitment into the Council's financial and investment framework pending final decisions.
- The Council's preferred investment restructuring model emphasises *Purpose 2 funding for regional infrastructure projects*. The Ōhau Channel Wall — a section of environmental infrastructure with community-wide and ecological significance — squarely meets that definition.

4. Scientific and Community Evidence Supporting the Wall's Ongoing Necessity

BoPRC has cited University of Waikato (UoW) modelling to suggest that, with Lake Rotorua near its TLI target of 4.2, removal of the wall would cause only a minor decline in Rotoiti's water quality. We respectfully challenge the sufficiency of this conclusion in light of the same reports' own findings, which state inter alia:

> - *'Even with the most ambitious reduction in maximum TLI in Lake Rotorua (i.e. 3.8), additional water quality management in Lake Rotoiti would be required to achieve the target TLI of 3.5.'*
> - *'Removal of the wall alongside a maximum annual TLI in Lake Rotorua of 4.2, without additional measures, will be insufficient to have Lake Rotoiti meet its TLI target of 3.5.'*
> - *'The TLI in Lake Rotoiti is still above its target. There is also no clear evidence that water quality in the lake is still improving... This suggests that the continued placement of the wall is still warranted.'*
>
> — *University of Waikato (UoW)* ***ERI REPORT NUMBER 169***

Additionally, most recent TLI data shows Lake Rotorua trending upward. Climate variability, sediment nutrient cycling, and groundwater lag effects mean that long-term improvement to Rotorua's water quality remains highly uncertain. In this context, the community holds a well-founded conviction that it will likely be several decades or more — if ever — before conditions justify removal of the wall.

5. Alignment with BoPRC's Investment Purposes and Evaluation Criteria

The Draft Annual Plan identifies three purposes for the Council's investment portfolio. We submit that remediation of the Ōhau Channel Wall is directly aligned with at least two of them:

- **Purpose 1 — Environmental work and core Council functions:** The wall is an existing section of environmental infrastructure held under a BoPRC resource consent. Its maintenance is a core obligation of the Council, directly supporting freshwater quality outcomes mandated by national and regional policy.
- **Purpose 2 — Regional infrastructure investment:** Long-term engineered remediation of the wall constitutes a significant regional infrastructure investment with multi-generational environmental and amenity value for not only the Rotorua Lakes District and Rotoiti community, but the host of national and international visitors that enjoy Lake Rotoiti for its beauty and recreational attributes.

The Council's own seven evaluation criteria for investment options include protecting long-term value, enabling sustainable benefit, promoting equitable regional reach, and providing governance best practice. Committing a remediation budget for the Ōhau Channel Wall satisfies all four of these criteria.

Conversely, further deferral risks irreversible damage to a regionally significant water body — a failure of intergenerational *kaitiakitanga* that would be inconsistent with the values underpinning the proposed trust model.

6. Our Specific Requests

We respectfully request that Bay of Plenty Regional Council:

a. Establish a specific, adequately funded budget line for the long-term retention and remediation of the Ōhau Channel Wall within the Annual Plan 2026/27 and the broader Long Term Plan cycle.

b. Ensure that any new investment structure (including the preferred Hybrid Model) explicitly identifies the Ōhau Channel Wall remediation as a qualifying environmental infrastructure investment eligible for Purpose 1 or Purpose 2 funding.

c. Commit to a defined remediation timeline — not merely a further assessment timeline — so that the community can have confidence that active physical remediation will commence without further unnecessary delay following completion of the DAPP process.

d. Continue to engage transparently with the Rotoiti Liaison Panel, LRCA, LWQS, and the wider community throughout the DAPP process, including sharing the results of the most recent structural inspections as soon as they are available.

e. Acknowledge publicly that, on available scientific evidence, the Ōhau Channel Wall will need to be retained and maintained for the foreseeable future — likely decades — and that planning and budgeting should reflect this long-term horizon.

7. Conclusion

Lake Rotoiti is a *taonga* of enormous cultural, ecological, and recreational value. The Ōhau Channel Wall should not be viewed as a legacy inconvenience — it is an active and essential guardian of that lake's health. The science, including BoPRC's own commissioned reports, confirms that the wall continues to be warranted. The community has demonstrated sustained, organised, and evidence-based advocacy for its retention and repair.

In considering how best to steward its $3.14 billion investment portfolio for long-term regional benefit, we urge Council to recognise that protecting the *mauri* of Lake Rotoiti through a committed remediation budget for the Ōhau Channel Wall is one of the most tangible, high-impact investments it can make for the people of the Bay of Plenty region, and the large numbers of national and international tourists and visitors who frequent Lake Rotoiti and the Rotorua lakes — now and for generations to come.

We request the opportunity to speak to this submission at the relevant hearing.

Sincerely

P Browning

Peter Browning
Chairperson