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15 April 2014

Chief Executive Bay of Plenty Regional Council PO Box 364 WHAKATANE 3158

SUBMISSION TO BOPRC DRAFT ANNUAL PLAN 2014-15

The Lake Rotoiti Community Association welcomes the opportunity to make this submission to Bay of Plenty Regional Council's Draft Annual Plan. The Association is a long standing charitable organisation representing a wide community of interest and has for many years been one of the leading community voices in the Region.

 We acknowledge that this Annual Plan is the third under the current regime of revolving Ten Year Plans. We trust that the issues raised in this submission continue to receive your attention and consideration. We wish to once again address our ongoing concerns over the sustainable water management programme for the Rotorua Lakes, along with our continuing dissatisfaction over Council's current Targeted Rating Policies.

Sustainable Water Management

- 2. Lakes water quality and particularly that of Rotoiti and Rotorua has ever been under close scrutiny by this Association and its residents. In conjunction with the Lakes Water Quality Society, we have played major roles in ensuring the implementation of management plans to address the significant declines experienced in the late 1990s. We acknowledge a number of important interventions that have been undertaken since and the ongoing monitoring programmes currently existing.
- 3. The most recent toxic algal bloom warnings In Okawa Bay and Okere Arm highlight the continuing fragility of these two lakes and prompt questions over any reliance on existing TLIs in terms of non-moving future targets. It is already conceded that these standards have no guarantee of eliminating future algal blooms although we may expect them to be of lesser frequency and severity. Although shorter term strategies are deemed to have brought success, some of these such as alum dosing do not meet with universal approval due to possible negative aspects.

- 4. There is now some mounting concern amongst a number of our residents over the pace and direction of the present programmes. There is increasing belief that more emphasis (funding) should be applied to the known and potential catchment problem areas e.g. streams and rivers; continued proximity fertilisation of pastures; gorse and scrub; exotic forest plantations; effect of pest animals on shoreline native reserves. Whilst a number of actions are summarised in the DAP (pages 45-46) it is contended that more urgency is needed to address catchment issues such as those described here.
- 5. We support the implementation of the Lake Okataina Action Plan and ask that this implementation be treated as a key project for the Rotorua Lakes Programme. In particular we request that council develop a pest control plan for Okataina as a matter of urgency, and encourages DOC to do so as well. The damage caused by wallabies, possums and other pests in the bush surrounding Lake Okataina appears to be a major reason for the alarming decline in water quality currently occurring at this "Pristine Lake".

Funding Impact Statement - Rates

- 6. In the two previous years, we have raised strong objections to the level of general rate increases that were proposed and ratified for 2012 onwards, particularly for Rotorua residents. We are pleased to note that the average increase for this year has been reduced to around 3% which, whilst still above CPI, will be more acceptable to most ratepayers.
- 7. Notwithstanding, we continue to protest against the unfair and inequitable allocation of the Rotorua Lakes Targeted Rate upon our residential property owners. This inequity has remained constant since the introduction of the RLTR in 2006-07 with around 80% of the required revenue (Page 126 in this DAP) levied against properties of <2ha which contribute only 8% of the calculated nutrient discharge to the lakes. Council's seemingly intransigent attitude in not allocating a commensurate portion of this rate to the main exacerbators, dairying, is indeed perplexing and lacks justification. The perpetual pretext of an inability to equitably apportion a rate across the farming sector is well past its use by date and should have long been resolved. We remind you that lakes residents in particular, continue to pay considerable costs towards reticulated sewerage schemes specifically implemented to minimise or prevent their point source discharge of nutrients to the lakes.</p>
- 8. Moreover, we remain of the firm opinion that there is no equitability in the funding of similar ongoing work in both the Sustainable Coastal Implementation Programme and restoring the Tauranga Harbour 100% from general rates whilst the RLTR attracts only 50% subsidy from the Region. It is our view that all of these projects warrant similar funding treatment.
- 9. We wish to be provided with the opportunity to speak to this submission at a Rotorua location.

Yours sincerely

Hilary Prior Chairperson