

# PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPĀ RIVER CATCHMENTS



**Submission form on publicly notified – Proposed Waikato Regional Plan Change 1 – Waikato and Waipā River Catchments.**

**Important: Save this PDF to your computer before answering. If you edit the original form from this webpage, your changes will not save. Please check or update your software to allow for editing. We recommend Acrobat Reader.**

*FORM 5 Clause 6 of First Schedule, Resource Management Act 1991*

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

## SUBMISSIONS CAN BE

<b>Mailed to</b>	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
<b>Delivered to</b>	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
<b>Faxed to</b>	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
<b>Emailed to</b>	healthyivers@waikatoregion.govt.nz <i>Please Note: Submissions received by email must contain full contact details.</i>
<b>Online at</b>	www.waikatoregion.govt.nz/healthyivers

**We need to receive your submission by 5pm, 8 March 2017.**

## YOUR NAME AND CONTACT DETAILS

Full name: Chris and Amy Paterson  
 Full address: 33 Graham Street, Hamilton East, Hamilton 3216  
 Email: chrispatersonnz@gmail.com  
 Phone: 021 451 112 Fax: \_\_\_\_\_

## ADDRESS FOR SERVICE OF SUBMITTER

Full name: Chris Paterson  
 Address for service of person making submission: 33 Graham Street, Hamilton East, Hamilton 3216  
 Email: chrispatersonnz@gmail.com  
 Phone: 021 451 112 Fax: \_\_\_\_\_

## TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

- I could /  could not gain an advantage in trade competition through this submission.
- I am /  am not directly affected by an effect of the subject matter of the submission that:
- adversely effects the environment, and
  - does not relate to the trade competition or the effects of trade competition.

Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

**THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO**

*Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1 (Continue on separate sheet(s) if necessary).*

**As per attached sheets.**

**I SUPPORT OR OPPOSE THE ABOVE PROVISION/S**

*(Select as appropriate and continue on separate sheet(s) if necessary).*

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

**As per attached sheets.**

**MY SUBMISSION IS THAT**

*Tell us the reasons why you support or oppose or wish to have the specific provisions amended. (Please continue on separate sheet(s) if necessary).*

**As per attached sheets.**

**I SEEK THE FOLLOWING DECISION BY COUNCIL**

*(Select as appropriate and continue on separate sheet(s) if necessary).*

- Accept the above provision
- Accept the above provision with amendments as outlined
- Decline the above provision
- If not declined, then amend the above provision as outlined

**As per attached sheets.**

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

- I wish to speak at the hearing in support of my submissions.  
 I do not wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS

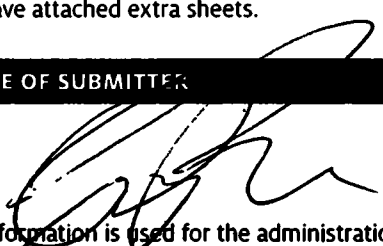
- If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

- Yes, I have attached extra sheets.  No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

Signature:



Date:

8/3/17

Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

**PLEASE CHECK** that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

## **Submission for Proposed Plan Change 1 for Chris and Amy Paterson**

We are from third and fourth generation New Zealand farming families and have been involved in farming for our entire lives. We enjoy living in Hamilton City and currently own and operate a 36ha property at Puketaha located in the Komakorau sub-catchment which is a Priority 2 area for implementation of Farm Environment Plan. Our property is currently used for the production of maize silage, maize grain and annual pasture. Further to our own farming enterprise we have involvement in our families farming operations and are both employed off-farm in businesses connected to the farming and agricultural industries.

We agree with the aspiration of the Vision and Strategy for the Waikato and Waipa Rivers. As a family we currently enjoy a range of water sports, swimming and trout fishing on the Waikato River. Although we would like to be involved and 'do our bit' to help improve water quality for future generations in the Waikato lakes and rivers it is our view that careful consideration needs to also be given to the holistic sustainability of the Waikato region. This includes not only environmental sustainability but also social and economic sustainability. The challenge for the Waikato Region's population both urban and rural is to ensure that all of these factors are sustainable in the long term and each factor needs to be considered without one factor unduly affecting the other factors. Before we would be able to fully support this proposal we would ask that further research is undertaken into the impact of the proposed environmental changes on social and economic effects with this information being reported back to the wider community to be taken into consideration.

**PLAN CHANGE PROVISIONS SUPPORTED OR OPPOSED, REASONS AND DECISIONS SOUGHT**

Section Number of the Plan Change	Support/Oppose	Submission	Decision Sought
1. Page 15. Bullet point three	Support in part	A property scale nitrogen reference point be established by modelling current nutrient losses from each property, with <b>no property being allowed to exceed its reference point</b> in the future and higher dischargers being required to reduce their nutrient losses. This submission is that the sentence should be changed to <b>no property being allowed to exceed its nitrogen reference point in the future based on the properties five-year rolling average.</b>	To change the sentence as proposed under the submission

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<p>2. Schedule B on page 47 and Point (c), the nitrogen reference point.</p>	<p>Oppose in part</p>	<p>It reads 'the nitrogen reference point must be calculated using the current version of the Overseer model or any other model approved by the Chief Executive of the Waikato Regional Council'.</p> <p>The Foundation for Arable Research (FAR) completed an independent review of OVERSEER in 2013 (<a href="https://www.far.org.nz/research/environment/overseer-review">https://www.far.org.nz/research/environment/overseer review</a> ).</p> <p>The review found that OVERSEER is currently the best tool available for estimating long term, average nitrate leaching losses from the root zone across NZ farming systems but further work is required to improve the confidence in estimates obtained of nitrate leaching levels for arable farms. Subsequent work to validate nutrient losses from OVERSEER with APSIM (Agricultural Production Systems Simulator) was completed. Recommendations from these pieces of work have not yet been implemented into the OVERSEER crop module. Nitrogen loss numbers generated by OVERSEER are therefore a rough guide only, this guide will not be sufficiently accurate for calculating the ongoing NRP's required for compliance.</p> <p>Overseer has difficulty in generating accurate numbers for some soil types. In particular the unique characteristics of peat soils do not appear to be accounted for well. Peat is a high organic soil and is capable of capturing and holding high levels of nitrogen and phosphorus which can</p>	<p>Further significant work is required with OVERSEER before it can be used as a calculation or assessment tool for the purpose of meeting compliance in cropping situations. A dispensation should apply to cropping operations until this matter can be resolved either by way over OVERSEER being improved or other models such as NCheck being approved by the WRC.</p> <p>Unique soil characteristics of peat need to be researched further with data implemented in overseer. Peat soils should have</p>

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<p>3. Schedule 1, requirements for farm environment plans, Point - 2(f): description of cultivation management, and it is Point ii) (d) which is maintaining appropriate buffers between cultivated areas and water bodies, <b>minimum 5 metre setback.</b></p>	<p>Oppose</p>	<p>Riparian width research for the Waikato shows that 91% of incoming sediment through a grass filter was deposited in the first 0.6 metres (reference Parklyn, S. 2004), therefore a 5 metre strip is not required on flat land with low velocity runoff, a 0.6 metre filter strip is sufficient to filter out sediment and therefore phosphate and E.coli. The reference for this paper is Parklyn, S. (2004, September). Review of Riparian Buffer Zone (MAF). Retrieved from: <a href="http://www.biol.canterbury.ac.nz/ferg/MacKenzie%20project/PDF/Riparian%20management/upper-waitaki-submitter-evidence-maf-technical-paper-review-riparian-buffer-zone-effectiveness.pdf">http://www.biol.canterbury.ac.nz/ferg/MacKenzie%20project/PDF/Riparian%20management/upper-waitaki-submitter-evidence-maf-technical-paper-review-riparian-buffer-zone-effectiveness.pdf</a></p>	<p>Based on this evidence, it is recommended that the 5 metre setback zone on flat land be changed to 0.6 metres.</p>
<p>4. Definition of Cultivation, page 80</p>	<p>Support in part</p>	<p>The definition of cultivation is preparing the land for growing pasture or a crop and the planting, tending and harvesting of that pasture or crop but <b>excludes direct drilling of seed, no tillage practices, recontouring of land and forestry.</b> We support this definition but based on evidence we would like strip tillage excluded also..</p>	<p>We would like to support the current definition but would ask that <b>strip tillage</b> be added into the definition of cultivation that is excluded.</p>

<p>5. 3.11.5.2 Point 4(d) on page 40, no winter forage crops are grazed in situ. This is linked to the definition of a forage crop on page 82.</p>	<p>Support in part</p>	<p>The definition currently is that forage crop means crops annual or biennial which are grown to be utilised by grazing or harvesting as a whole crop. Winter saved pasture can be considered a forage crop as it can be saved and then grazed through that winter period.</p>	<p>Pasture should be excluded from this section of forage crops, therefore it could read, <b>'forage crop: means, crops annual or biennial which are grown to be utilised by grazing or harvesting as a whole crop, excluding any winter saved pastures'</b>. Clarification is also required as to how winter is defined for this point.</p>
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<p>6. Schedule B Nitrogen reference point, page 47 (f) - the reference period is the two financial years covering 2014/15 and 2015/16, except for commercial regional production in which case the reference period is 1 July 2006 to 30 June 2016.</p>	<p>Oppose</p>	<p>It is a concern about the historical effect that occurs with the assessment of farms for the years of 2014/15 and 2015/16 year and how that unfairly position farms financially that have been working towards reducing environmental impact. For example, two farms of the same size and infrastructure: Farm A has reduced environmental impact over the last 10 years and has a nitrogen reference point of 22. Farm B is a more intensive operation which has a nitrogen reference point of 45. Prior to the proposal coming out they were worth the same value per hectare, now Farm A could be worth 20% - 30% less per hectare as well as less saleable (already occurring) than Farm B, as the nitrogen reference point is much lower and provides less farming options/alternatives/flexibility of potential farm systems. Therefore, those who have already implemented strategies to reduce environmental impact of their farming operation over the previous decade will be financially penalised compared to farms who have not.</p>	<p>A review of this period of assessment needs to be taken and a potential sub-catchment optimal level to be established, for example a nitrogen reference point of say 30, where farms eventually will reduce their levels to over time, over the next 10 years, and those that are currently underneath have the opportunity to potentially increase if they so wish. Therefore, the value of their property is less affected than under the current proposal. The overall net effect will still be a reduction for the catchment</p>

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<p>7. Objective 1, page 28. Objective 1 sets long-term limits for water quality consistent with the vision and strategy objective 1 sets aspirational 80 year water quality targets.</p>	<p>Strongly support</p>	<p>We support the 80 year water quality targets. This timeframe is most suitable to achieve what we want to achieve. Anything shorter than this and we set ourselves up for failure. Consideration needs to also be given to the holistic sustainability of the Waikato region including not only environmental sustainability but also social and economic. The balance is to ensure that all of these factors are sustainable in the long term and need to be considered without one unduly affecting the other</p>	<p>Continuation of the 80 year water quality target. Further research is required into the impact of the proposed environmental changes on social and economic effects with this information being reported back to the wider community to be taken into consideration before this proposal can be supported</p>