

# 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	
<b>FOR OFFICE USE ONLY</b>			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

## SUBMISSIONS CAN BE

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

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

## YOUR NAME AND CONTACT DETAILS

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## ADDRESS FOR SERVICE OF SUBMITTER

Full name: Alex Bromham  
 Address for service of person making submission: 598 Kopaki Road, RD 3, Te Kuiti 3983  
 Email: alex.bromham@farmside.co.nz  
 Phone: 07 8786985 Fax: 07 8786985

## 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).

Schedule C - Stock Exclusion  
Schedule B - Nitrogen Reference Point  
Rule 3.11.5.7 - Non-Complying Activity Rule  
Rule 3.11.4.3 - Farm Environment Plans  
Objective 2

## 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

## 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).

Our farm has 3.7 kilometers of streams plus numerous drains and several wetlands some of which would be nearly impossible to fence due to the steepness of the terrain and geology. Our business cannot afford to fence these waterways at the current time and having to do so would require us to borrow to cover the cost.

Our livestock currently seldom enter the main waterway even though it is unfenced as the banks are steep. The wording of the Schedule C currently does not make it clear what sort of topography would be considered a natural barrier.

"1. The water bodies must be fenced to exclude cattle, horses, deer and pigs, unless those animals are prevented from entering the bed of the water body by a stock proof natural barrier formed by topography or vegetation."

The adverse economic impacts of fencing the waterways to exclude stock greatly outweigh any potential environmental benefits that would result. I seek that the Schedule C relating to stock exclusion is deleted.

If landowners are required to permanently fence waterways to exclude stock then central government funding or tax relief should be given to enable this to occur without placing the full cost of the mitigation on landowners. A fundamental principle of the plan should be that beneficiaries of the plan should have an equitable share of the costs of its implementation.

## 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

**ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION**

**Section number of the Plan Change:** Schedule B - Nitrogen Reference Point

**Do you support or oppose the provision?**

Support  Oppose

Submission	Decision Sought
<p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>The plan stipulates the use of OVERSEER or nominated alternative. The OVERSEER model is a mathematical model that attempts to capture the complexity of nutrient cycling in a farm system. It is not fit for the purpose which it is being used by plan: namely to set Nitrogen leaching limits.</p> <p>It is a matter of record (Hansard 26 Nov 14, 2 Dec 14) that specific concerns were raised about OVERSEER's fitness for purpose and in particular its use for setting nutrient limits and compliance monitoring in regional council plans.</p> <p>One expert estimates the errors in estimates of nitrate leaching are plus or minus 30 per cent with this model. But the errors can be up to 50-100 per cent if some of the input data is not correct.</p> <p>The Overseer N leaching model has not been tested, or calibrated, in all the possible combinations of climate, soil type and farm systems.</p>	<p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>We seek that the limits on Nitrogen losses and the grand parenting approach in the plan are removed.</p> <p>Should this not be accepted then we seek that an alternative model to OVERSEER is sought, one which has been tested and calibrated to all the possible combinations of climate, soil type and farming systems.</p>

**Section number of the Plan Change:** Rule 3.11.5.7

**Do you support or oppose the provision?**

Support  Oppose

Submission	Decision Sought
<p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>We object to the limits placed on land use change within the plan. As business owners it limits our ability to change our farm system to meet changes in national and global demand. By reducing our flexibility to adapt to changing demand our future profitability is threatened.</p> <p>This may also reduce the value of our farm to future prospective purchasers</p>	<p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>We seek that changes in land use do need be notified or require resource consent from Council.</p>

**ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION**

Section number of the Plan Change: 3.11.4.3 Farm Environment Plans

Do you support or oppose the provision?

Support  Oppose

Submission	Decision Sought
<p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>We support the inclusion of FEP but object to the sole use of "professionals" to develop, certify and monitor them.</p>	<p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>Council should develop software tools and templates which enable land owners to develop their own FEP. Professionals or consultants may optionally be used by the landowner to complete the FEP should they so wish.</p> <p>There should be no cost to the landowner for the use of these FEP templates/tools and Council could use the same system that is used by the landowner to develop their FEP in order to monitor and assess FEPs.</p> <p>This proposal will empower the land owner, reduce costs to the landowner and reduced cost to the council (and rate payer) due to a common system being used by all.</p>

Section number of the Plan Change: Objective 2 Social, economic and cultural wellbeing is maintained in the long

Do you support or oppose the provision?

Support  Oppose

Submission	Decision Sought
<p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>Objective 2 is to be commended but much of "change plan 1" needs to be either deleted or enhanced to ensure social and economic wellbeing is maintained in the long term. In its current form this plan is likely to adversely affect the social and economic wellbeing of the communities it encompasses and the neighboring communities.</p> <p>The reason for adopting Objective 2 states "...it is important to minimize social disruption during this transition." However, this document has social disruption at its heart.</p>	<p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>Ensure Objective 2 is being meet when considering the implications of each section in this document.</p>

**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:

*U Bromham  
AOC Stewart*

Date: *3rd March 2017*

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.