

SUBMISSION FORM - PROPOSED WAIKATO REGIONAL **Waikato** PLAN CHANGE 2 - TAUPŌ OVERSEER VERSION



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.

We must receive your submission by 5.00 pm, 28 May 2020
Please read the Guide to Writing a Submission at the end of this form before completing your submission

MANDATORY INFORMATION

YOUR NAME, ADDRESS FOR SERVICE AND CONTACT DETAILS

Name of Submitter (individual/organisation): South Waikato District Council Post code: 3444
Contact Person (if applicable): James Witham
Agent (if applicable): _____
Email Address for Service: james.witham@southwaikato.govt.nz
Postal Address: Private Bag 7, Tokoroa
Phone Number/s: 07) 885 0709

TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)

- I could/ could not gain an advantage in trade competition through this submission. [Refer to guide below for further information]
 I am / am not directly affected by an effect of the subject matter of the submission that:
(a) adversely effects the environment, and
(b) does not relate to the trade competition or the effects of trade competition.

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

Yes, I have attached 1 extra sheets. No, I have not attached extra sheets.

SIGNATURE - note a signature is not required if you make your submission by electronic means

Signature [or typed name if submitting electronically]:

Date: 27/5/2020

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, or corner of Paora Hapi and Titiraupepa Streets, Taupō, subject to restrictions relating to COVID-19
Faxed to (07) 859 0998
Emailed to healthyenvironments@waikatoregion.govt.nz **Please note: Submissions received by email must contain full contact details**

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.

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

Streamlined Planning Process. This submission relates to a Streamlined Planning Process being undertaken in accordance with directions made by the Minister for the Environment. The directions can be viewed at www.waikatoregion.govt.nz/taupo-overseer. There will be no hearing with respect to the Plan Change. Instead, if requested, or on its own initiative, the Council will undertake **resolution of disputes** in accordance with clause 8AA of Schedule 1 of the Resource Management Act 1991 (to the extent applicable under the Minister's Direction). The Minister will make the final decision on the Plan Change.

Enquiries to: James Witham
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Email: james.witham@southwaikato.govt.nz

27 May 2020

To Whom It May Concern

PLAN CHANGE 2 - TAUPO OVERSEER VERSION - SUBMISSION - SOUTH WAIKATO DISTRICT COUNCIL

The South Waikato District Council (Council) takes a neutral stance on Proposed Plan Change 2 to the Waikato Regional Plan. However, Council does have concerns about the content and principles of the change, that the situation has had to be managed with urgency, and that the process will proceed without the normal rigour of a hearings process.

Council acknowledges that the overall framework for managing water clarity in Lake Taupo is fundamentally different to that of PC1 to the Waikato Regional Plan. In particular, the grandparenting/capping approach to Nitrogen. This may be contrasted with the 80 year programme of aggressive reductions of Nitrogen, Phosphorus, Sediment and E.coli required of farmers of the Upper Waikato Catchment in the South Waikato District in terms of fairness and reasonableness. This is in addition to the absence of requested financial and technical support provided to farmers, the South Waikato Environmental Initiatives, and Council by Waikato Regional Council for catchment management and restoration projects in our district, particularly in the Upper Waikato Catchment. Changes in management in Lake Taupo should not result in South Waikato Farmers having to do more, and Waikato Regional Council needs to better support farmers in our district.

The South Waikato District Council acknowledges the need to update the version of OVERSEER in order to ensure the current framework is functional. However, Council has concerns about the rigour of the approach and the urgency required. This is something that would have been addressed through evidence in a schedule 1 process. This is of concern, given that the indicative leaching rates appear higher in the model OVERSEERFM assessed by the Section 32 report. Council wants to be satisfied that sufficiently robust analysis has been undertaken to ensure that the 'net' result of the proposal is the same as, if not better, than the model that capped initially Nitrogen. Farmers of the South Waikato, working in a more stringent framework already, should not be required to further make up for N losses accrued in the Taupo Catchment.

The proposal appears to create a significant amount of uncertainty moving forward. Much of the content of the technical reports and Section 32 relates to concerns relating to comparing outputs from different models, particularly for the calculation of Nitrogen already removed from the catchment through Nitrogen trading. However, the proposal does not fix a version of the OVERSEER model. While Council acknowledges that some calibration testing was undertaken for OVERSEERFM, this cannot be done for future versions as part of this plan change. Any changes in model should be required to undergo robust calibration and analysis prior to use. Council would have preferred to explore and understand the implications of moving towards the reference dataset approach as the response to this issue, if it had been given the opportunity.



James R. Witham
Senior Planner

On Behalf of

South Waikato District Council