

## SUBMISSION FORM

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

### IMPORTANT NOTE

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 need to receive your submission by 5pm, 23 May, 2018**

### YOUR NAME, ADDRESS FOR SERVICE AND CONTACT DETAILS (MANDATORY INFORMATION)

Name of Submitter (individual/organisation)		
Contact Person (if applicable)		
Agent (if applicable)		
Email address for service		
Postal address		
Phone number/s	Home:	Business:
	Mobile:	Fax:

### PLEASE INDICATE WHETHER YOU WISH TO SPEAK AT A HEARING

- Yes, I wish to speak at the hearing in support of my submission.
- No, I do not wish to speak at the hearing in support of my submission.

### JOINT SUBMISSION

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

## TRADE COMPETITION AND ADVERSE EFFECTS (SELECT APPROPRIATE)

- I could /  could not gain an advantage in trade competition through this submission. *Refer to last page for further information*
- 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.

## 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 - NOTE A SIGNATURE IS NOT REQUIRED IF YOU MAKE YOUR SUBMISSION BY ELECTRONIC MEANS

Signed \_\_\_\_\_ Date \_\_\_\_\_  
*Type name if submitting electronically*

## SUBMISSIONS CAN BE



Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240



Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton



(07) 859 0998



healthyrivers@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 administration 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

### 1. Trade competition

If you could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of part 1 of Schedule 1 of the Resource Management Act 1991 (RMA).

#### 6 Making of submissions

- (4) A person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that –
- a) adversely affects the environment; and
  - b) does not relate to trade competition or the effects of trade competition.

### 2. Privacy information

The Waikato Regional Council will make all submissions and further submissions including name and contact details publicly available at public libraries in the region, Council Offices and on Council's website. Any further submission, under the RMA, supporting or opposing your submission is required to be forwarded to you as well as Council.

Personal information will also be used for administration relating to the subject matter of the submissions, including notifying submitters of hearings and decisions. All information will be held by the Waikato Regional Council with submitters having the right to access and correct personal information.

### 3. Submission Content Review

Please note that the RMA states that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious
- It discloses no reasonable or relevant case
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- It contains offensive language
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**If you have questions about making a submission, please visit [waikatoregion.govt.nz/healthyrivers](http://waikatoregion.govt.nz/healthyrivers) to see our factsheet about Making a Submission.**

## SUBMISSIONS ON SPECIFIC PROVISIONS OF VARIATION 1 TO PROPOSED PLAN CHANGE 1

**PROVISION** (e.g. Objective 4 or Rule 3.11.5.1): \_\_\_\_\_

Do you support or oppose the provision?     Support     Support with amendments     Oppose     Oppose with amendments

### DECISION SOUGHT

*State clearly the decision and/or suggested changes you want council to make on the provision.*

The decision I would like the council to make regarding this provision is:

### SUBMISSION

*State clearly the reasons for the decision you want council to make.*

The reason for requesting this decision is:

To: Chief Executive  
Waikato Regional Council  
Private Bag 3038  
Waikato Mail Centre  
HAMILTON 3240

Submission on: **Variation 1 To Proposed Regional Plan Change 1 Waikato and Waipa River Catchments**

Submission by: New Zealand Trainers' Association

Date: 18 May 2018

Contacts:

Wendy Cooper  
Executive Officer  
NZ Trainers' Association Inc  
nztrainersassn@gmail.com  
Tel:094126225  
Mobile: 021927776  
PO Box 300-073, Albany, 0752  
[www.nztrainers.co.nz](http://www.nztrainers.co.nz)

New Zealand Trainers' Association wishes to be heard in support of this submission.

New Zealand Trainers' Association could not gain an advantage in trade competition through this submission.

New Zealand Trainers' Association members are 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

New Zealand Trainers' Association (NZTA) welcomes this opportunity to submit on the Variation 1 To Proposed Regional Plan Change 1 Waikato and Waipa River Catchments Waikato Regional Policy Statement. We acknowledge any submissions made by individual members of NZTA.

## **Background**

The New Zealand Trainers' Association (Inc) is an incorporated society established in 1975, with the aim of providing a collective voice for licensed thoroughbred racehorse trainers throughout New Zealand.

We represent approximately 900 members across five regional branches throughout New Zealand – the largest membership by far being the Waikato branch. The aim of our organisation is to encourage, promote and advance generally the interests of racehorse trainers and to deal with all matters conducive to the advancement of racing in general.

The New Zealand Thoroughbred Industry on a whole contributes more than \$1,635 million to the New Zealand economy, on economic terms it is comparable in size to the New Zealand Wine and the New Zealand Seafood Industry.

The racing industry in the Waikato region is estimated to be responsible for the generation of more than \$370.47million in value added contribution to the GDP.

New Zealand's two largest training centres are located in the Waikato – Cambridge and Matamata.

There are around 260 thoroughbred racehorse trainers licensed in the Waikato and a further 50 who run pre-training businesses where horses are prepared for racing. There are 10 race clubs who run 75 racemeetings at 7 venues where approximately 82500 people attend. There are 4,400 thoroughbred horses in training. Trainers' total expenditure in the Waikato region is approximately \$119.702million.

The Waikato region thoroughbred industry as a whole supports around 3,500 full time jobs within the Waikato. This does not account for all the associated industries that the racing industry contributes to economically.

Trainers in New Zealand generally come from a horseman's heritage where generations of stockmen who understand both the horse and the land have gone before. They have massive investment in specialised equipment and land suitable for training horses.

## **General Comments**

NZTA missed the opportunity to make a submission on the Waikato Regional Council Proposed Plan Change 1 – Waikato and Waipa River Catchments (PC1) but makes the following comments.

NZTA supports the overarching objective of PC1 to restore the water quality of the Waikato and Waipa River catchments while maintaining the social, economic and cultural wellbeing of people and their communities is maintained.

NZTA however has concerns that the equine businesses and wider equine community, in particular the Trainers', in the Waikato and Waipa catchments could be significantly impacted by the provisions of PC1. We believe that the provisions of PC1 does not reflect an understanding of equine property management to the extent that while constraining the business has little environmental benefit.

Horses being trained to race are kept in a combination of paddocks, stables and yards. In the case of the latter two, the manure is cleared on a daily basis and often sold in bags on the side of the road. Horses are not in training 12 months of the year however, so are grazed in paddocks – often at thoroughbred breeding studs or agistment centres around the Waikato.

Horses are produced as athletes not as production animals like dairy, beef, sheep and deer. As a result, equine management is significantly different to the rest of the pastoral sector, including nutritional requirements and expenditure, pasture management, and housing. For example, equine properties almost never apply nitrogenous fertilisers as rapidly growing pastures can cause behavioural issues and bone density issues in young stock.

Of greatest concern is the use of Overseer to achieve a Nitrogen Reference Point on equine properties. Of concern is;

- That Overseer has been developed using rumen animals, primarily the dairy cow. Horses are hind gut fermenters and it is our understanding that the Overseer model has incorporated horses on a stock unit basis using the assumptions developed for other stock classes.
- Overseer assumptions do not reflect different grazing patterns, feed utilisation or the housing (stabling) of horses.

### **Relief Sought**

That equine businesses and the farming of horses is withdrawn from PC1 until such time the provisions fairly and equitably reflect the equine sector including the environmental benefits achieved.

### **Variation 1**

#### **1. Provision**

Rules: 3.11.5.2(5); 3.11.5.3(5); 3.11.5.4(1); 3.11.5.4(2); 3.11.5.4; 3.11.5.5; Schedule A(1); Schedule B(e);

#### **Reasons for Submission**

Amending the dates is appropriate to ensure that actions are required by the proposed dates occur after Plan Change 1 is beyond challenge and will incorporate any amendments that occur during the First Schedule process.

Further if the First Schedule process is significantly delayed that Waikato Regional Council review these proposed dates and amend if required.

#### **Relief Sought**

That the proposed amendment to the dates in Variation 1 are adopted. Further that these dates are reviewed if the First Schedule process is delayed so that the actions required by the proposed dates do not occur until PC1 is beyond challenge.