

Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

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

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

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

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 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
Emailed to	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.</i>
Online at	www.waikatoregion.govt.nz/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS

Full name: Harry Das		
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ADDRESS FOR SERVICE OF SUBMITTER

Full name: As above		
Address for service of person making submission		
Email	Phone	Fax

TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

<input type="checkbox"/> I could / <input checked="" type="checkbox"/> could not gain an advantage in trade competition through this submission.
<input type="checkbox"/> I am / <input type="checkbox"/> am not directly affected by an effect of the subject matter of the submission that: (a) adversely affects the environment, and (b) 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.)

I have numbered my points below and these align (if Word doesn't mess things up) with the other sections.

1. Chapter 3.11: Area Covered by Chapter 3
2. Policy 6: Restricting land use change
3. Policy 2: Tailored approach to reducing diffuse discharges from farming activities
4. Policy 6: Restricting land use change
5. Schedule B - Nitrogen Reference
6. Schedule 1 - Requirements for Farm Environment Plans
7. Policy 9: Sub-catchment
8. Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges
9. 3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production

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.)

1. Our company opposes the progression of a PC1 without a comprehensive whole of catchment planning response. Most of our operations are in Pukekohe on the boarder of Auckland and Waikato. We have consents in both regions. The withdrawn area further divides our operations into three. This adds to additional uncertainty, complexity and cost.

There is a need for an operation that has land in multiple catchments to be treated as one. Managing multiple consents on top of what we already have will add a large amount of administration cost.

2. Best Management Practice for vegetable production is to rotate around sites. This is done for both soil quality and disease control reasons. This practice results in less soil erosion, less chemical applications, and higher production on a smaller footprint. There should be a clear process that recognises this practice and its associated benefits.
3. Vegetable operations form a part of a much larger catchment. The cost of the land in our high production areas makes setting aside land extremely expensive and a poor use of valuable land. We believe that a collaborative catchment based approach should be encouraged. Neighbouring farms can then work together to select the best environmental enhancement opportunities, rather than be forced to sacrifice highly productive land.

Vegetable production is putting in place, at great expense, a wide range of sediment and nutrient control measures. This includes interception drains and bunding, raised entries, larger culverts, and silt traps. These are capital intensive and need to be planned as part of a staged programme. Therefore we support Farm Environment Plan approach, where we can demonstrate our improvements over time. These plans should be part of an industry scheme like NZ GAP. This way we have 1 audit that meets council and our customers' requirements in a single visit.

4. There needs to be a clear way that growers can get approval of land use changes. Vegetable production has

no bacterial discharge, which should be recognised when moving from pastoral to vegetable production. Vegetable operations spend an enormous amount of money on erosion and sediment control, both research and implementing practices like cover crops, wheel track ripping, and silt traps. Preventing land from being rotated from pastoral to vegetable production, even for a short period of time, does not recognise this work.

There needs to be the ability for new vegetable production land if we can demonstrate that there is a decrease in discharges compared to the existing practice. All four contaminants that is the focus of Healthy Rivers should be looked at. We need to understand what weight is given to each contaminant. We discharge no *E. coli* and sediment is controlled through following Best Practice.

The ability to change land use that is shown to reduce discharges needs to be practical.

5. We do not have confidence that Overseer correctly calculates vegetable production nutrient losses. There should be alternatives ways of calculated the nitrogen reference point.
6. While in general we support the use of Farm Environment Plans, we are very concerned about the prescriptive nature of them as laid out in Schedule 1. FEP's are based on selecting the appropriate tools for a specific situation. Yet Schedule 1 dictates that there is a minimum cultivation setback of 5m. This is straight jacketing growers into one mitigation measure, which based on experience in cultivated situations may have very little benefit. Depending on the alternative mitigation measures this may needlessly waste highly valuable production land. Production land which is fast disappearing under urban sprawl in both Auckland and the Waikato.

In many situations the use of bunding and diversions into silt traps may be a significantly better option, yet under Schedule 1 we would be required to use a 5m buffer. The rule should refer to the industry developed Erosion & Sediment Control Guidelines for Vegetable Production – Version 1.1 June 2014.

7. There does not appear to be the ability to offset the effects of diffuse discharges by providing mitigation options on other land. Refer to point 3 above. We need to be empowered and encourage to take a whole of catchment approach. This means often looking beyond our own farm boundary for the best solutions.
8. Policy 11, which refers to point source discharge, seems to pick up many of the points that I have raised above. This approach of promoting Best Practice and offsetting should be equally applied to non-point source discharges.
9. We support in part Rule 3.11.5.5 that provides a Controlled Activity non-notified consent that recognises and provides for vegetable production. The protection of an operations total production area is supported and the ability to rotation across new and existing land. We are however very concerned by the 2016 cap. As Auckland's urban sprawl grabs large areas of productive land we are being forced onto alternative sites. For our operation that often means moving our Auckland operations into the Waikato. The cap on land in 2016 is going to prevent that move. This will have serious ramifications for the total land available for vegetable production when you look across both the Auckland and Waikato regions combined as we do. This not good for feeding our rapidly expanding population with fresh locally sourced food.

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 below
- Decline the above provision
- If not declined, then amend the above provision as outlined below

Amend as follows:

1. Withdraw PC1 in its entirety to allow for consultation with Hauraki iwi before any further Proposed Plan Change.

Re-notify PC1 with the inclusion of the withdrawn area relating to Hauraki iwi so that the catchment can be considered in entirety and so submissions and evidence can be coordinated for the whole of the catchment.

2. We oppose any provisions or consent requirements that discourage or make unduly difficult the ability to rotate our crops onto new land simply based on the type of operation.
3. Change the plan so that there is flexibility for growers to reduce discharges by working collaboratively with neighbours at a catchment or sub-catchment level.
4. Allow for operations capable of demonstrating that their practices reduce discharges, the ability to apply for a restricted discretionary consent.
5. That the Waikato Regional Council works with HortNZ to approve an alternative nutrient calculation method to Overseer.
6. Remove reference to a 5m buffer in Schedule 1. Replace with a reference to the industries Best Management Guidelines.
7. Proposed Policy 3.11 3 9 should be modified to provide for offsetting where it can be shown that there are better options for improved environmental outcomes elsewhere. The policy should allow groups to take responsibility for improving the environment through a combination of catchment and paddock scale mitigations.
8. Expand Policy 11 to include non-point source discharges.
9. Support Rule 3.11.5.5, but there needs to be a workable solution for developing new vegetable land as we are forced out of Auckland.

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.

Tick No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

(or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature



Date 07/03/17

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.