

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 Ryan Farms Ltd		
Full address 68 Pook Road, RD2 Pukekohe 2677		
Email grant.allium@xtra.co.nz	Phone 021 550289	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name Grant Ryan		
Address for service of person making submission 68 Pook Road, RD2 Pukekohe 2677		
Email grant.allium@xtra.co.nz	Phone 021 550289	Fax

TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
<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 checked="" type="checkbox"/> 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.
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.)*

On 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

See 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.)*

Attached in separate sheet

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:

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

(or person authorised to sign on behalf of submitter)

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

Signature Grant Ryan

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.

Additional Sheets

Section number of the Plan Change	Support /Oppose	Submission	Decision sought
Chapter 3.11: Area Covered by Chapter 3	Oppose	Oppose the progression of a PC1 without a comprehensive whole of catchment planning response.	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.
Chapter 3.11: Background and Explanation	Oppose	The plan would be improved by adding an issue statement to address particular issues for the horticultural sector.	Provide some opportunity for commercial vegetable production and support industries on new sites in the Waikato River catchment, to preserve the productive capacity of the vegetable sector; particularly in relation to the production of non-substitutable leafy greens, potatoes and carrots for domestic consumption in key periods of the national domestic foodchain. Ensure the plan provides for the establishment of an alternative method or model to establish a benchmark nitrogen and phosphorus discharge for commercial vegetable production systems from OVERSEER. The plan should make an explicit statement to recognise permanent fruit production as a low intensity farming activity.
3.11.1: Values And Uses For The Waikato And Waipa Rivers	Support	Support the identification of Primary Production as a Mana Tangata value of water arising from its use by people for economic, social, and cultural purposes.	Retain Primary Production as a Mana Tangata value.
3.11.2 OBJECTIVES			
Objective 2 Social, economic and cultural wellbeing is maintained in the long term	Support	PC1 does not fully support the social, economic and cultural wellbeing, Land change is critical to sustainability of our production systems Vegetable production and our support networks are vital to a healthy community and NZ.	Amend PC1 rules to ensure and maintain the economic and social community health.

Objective 3 Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	Support in part/Oppose in part	Agree we need water quality improvement's that are sustainable and achievable. Overseer does not work for our production system and is not an accurate means of measurement. All major contaminants should be measured in a sub catchment system not just 1 or 2.	Amend PCI rules to incorporate Sub-catchment system addressing all containments, Remove Nitrogen Ref Point and the use of Overseer for our production systems.
Objective 4 People and community resilience	Support in part	Support policy, however the rules do not reflect ability to rotate land in a sustainable model. Capping of land impacts our business so reflects on community. Support Farm Plans with a sub catchment model.	Amend PC1 for the use of sub catchment plans removing capping and the Nitrogen Ref Point.
3.11.3 POLICIES			
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	Support	Support management of discharges for all main contaminants.	Retain as proposed
Policy 2: Tailored approach to reducing diffuse discharges from farming activities/	Support in part/Oppose in part	Support Farm Plans that are supported by our current systems, which include Best Management Practice and is tailored to each farm needs. . There should be alternatives to the nitrogen reference point during the transitional period given the limitations of OVERSEER for modelling horticultural systems.	Take out Nitrogen Ref Points from PC1, include the restrictions of Overseer
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	Support in part/Oppose in Part	We support a planned approach to reduction of discharge from farm where we have recognition we are a essential industry. <ul style="list-style-type: none"> • Remove Nitrogen Ref Point. • Support Farm Plans that include the management of all contaminants within sub catchments. • Do not support Capping of land 	Vegetable production and its support network is a essential industry. We need to have land use flexibility to ensure sustainability and water quality. Subcatcmnts are critical to ensure management of contaminants. Delete Nitrogen Ref Point
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	Support	Agree we need lower discharges provided we have accurate and sound data that supports what lower discharges are.	Retain as proposed. Measurement of Lower Discharges what does this entail?

Policy 5: Staged approach	Support	Support staged approach to implementing the Vision and Strategy. But also feel there are gaps in the data that supports PC1.	Retain staged approach as proposed. Amended Rules to show justifiable gains made in the 10 years.
Policy 6: Restricting land use change	Oppose	Ryan Farms do not support restricted land use, We need the ability to rotate and retire and reintroduce land back into production for sustainability for production and the environment. The Northern Waikato region is unique in soil type/climate and is critical to NZ we have the ability to operate sustainably with land use. If we use Best Cropping Practice with sound Farm Plans we will be able to meet our obligations. If we do not have the ability to rotate and have land change we will be severely affected.	Remove Policy 6 from PC1, allowing land use change and good sound sustainability.
Policy 7: Preparing for allocation in the future	Support in part/Oppose in Part	The proposed plan change should allow and encourage sub catchment plan approach, rather than managing this in the future. Could see a market develop for trading Nitrogen etc.	Amend to include sub catchment plans.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	Support in Part	Agree we need sub catchment management in the policy, but need to have a consideration for collective management of diffuse discharges outside of the boundary on a sub catchment basis.	Amend Policy 9 to show collective management of diffuse discharges on a sub catchment level
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	Support in part	Support	Retain
3.11.5 RULES			
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	Support	Support	Retain as proposed.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	Oppose	Oppose the non-complying activity status for land use. This does not allow rotation within our sector for sustainable and best environmental practice. We are a unique environment in NZ and we are	Remove Rule 3.11.5.7 from PC1

		<p>essential to the Nation at certain times of the year.</p> <p>Auckland is moving south we need some ability to utilise the unique environment we have for production in the Waikato this would not allow this to happen under this rule.</p> <p>Vege Production makes up less than 2% of the land use in the Waikato-Walpa Catchment, if we use Farm plans and robust Best Management Practices we will have minor impact on the land if Land use change is allowed.</p>	
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Background and Introduction:
Submission PC1 Plan Change.
Ryan Farms, (P&M Ryan Trust).
8th March 2017.

We are a 3rd Generation Vegetable Grower and Onion Seed Breeding Family Business based in Pook Road, Harrisville. My Great Grandfather began Vegetable Production in the late 1940s on this farm.

Our total area compromises of 9.54ha of Patamahoe Clay Loam soil, with an average rainfall of 1400mm, we are on mixed rolling terrain. We have recently set aside a parcel of land into a conservation lot with a developing wetland.

Our main areas of activity are Onion Plant Breeding which includes onion production for plant breeding purposes as well as seed production. We supply onion seed to all of New Zealand, the majority of which is based in Northern Waikato and South Auckland. We also supply the international Markets of Australia, USA and South Africa.

Grant Ryan