

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

Pukekohe Vegetable Growers Association Inc (PVGA)		
P O Box 462		
Email: secretary@pvga.org.nz	Phone 0211442636	Fax

ADDRESS FOR SERVICE OF SUBMITTER

Full name: Brent Wilcox, President		
Address for service of person making submission: as above		
Email: secretary@pvga.org.nz	Phone 0211442636	Fax

TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

I 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.)*

Chapter 3.11; Objective 2, Objective 3, Objective 4, Policy 1, Policy 2, Policy 3, Policy 4, Policy 5, Policy 6, Policy 7, Policy 8, Policy 9, Policy 11, Rule 3.11.5.1, Rule 3.11.5.5, Rule 3.11.5.7

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(select as appropriate and continue on separate sheet(s) if necessary.)

We 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.)

The Pukekohe Vegetable Growers Association (PVGA) represents commercial vegetable growers from Warkworth in the north to Te Kauwhata in the south and have a key role in addressing issues of concern to our sector. We have significant concerns regarding the potential impact of Proposed Plan Change 1 on our sector. Availability to the soils in the northern Waikato area is fundamental to the ability of commercial vegetable growers to meet the national food supply demand of the New Zealand population. Restricting this ability will impact on our communities and our sector.

We consider that Plan Change 1 in its current form does not meet the objectives of the Waikato River Authority Vision and Strategy and oppose the Proposed Plan Change, specific details are included in the 'additional information table attached'. Further information regarding our organisation is also attached.

I SEEK THE FOLLOWING DECISION BY COUNCIL

(select as appropriate and continue on separate sheet(s) if necessary.)

Please refer to 'additional sheet for making submission' for details of amendments required and parts opposed.

Amend as follows: Please refer to 'additional sheet for making submission' attached.

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.

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

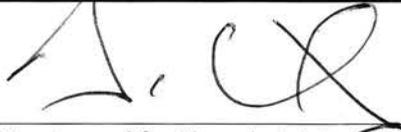
Yes, I have attached extra sheets.

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

8 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.

Additional sheet to assist in making a submission

Section number of the Plan Change	Support /Oppose	Submission	Decision sought
Please refer to title and page numbers used in the plan change document	Indicate whether you support or oppose the provision.	State in summary the nature of your submission and the reasons for it.	State clearly the decision and/or suggested changes you want Council to make on the provision.
Chapter 3.11: Area Covered by Chapter 3	Oppose	The division that has resulted from the withdrawal of the Hauraki Iwi area, significantly impacts on commercial vegetable growers located in the northern Waikato region. Submitting in duplication on the same plan, with the potential for two sets of rules to be given effect to within a catchment is unacceptable.	Withdraw PC1 and re-notify as a single plan upon completion of consultation with Hauraki Iwi.
Chapter 3.11: Background and Explanation	Support with amendment.	Horticulture is considered to be an essential industry and should be recognised within the Plan as such. Specifically we suggest that the issues faced by the horticulture sector should be considered within the background and explanations.	Amend background and explanations to include and outline the specific issues facing the horticultural sector.
3.11.1: Values And Uses For The Waikato And Waipa Rivers	Support	We support Horticulture as a Mana Tangata value but believe PC1 fails to adequately recognise this.	Amend rules to reflect horticulture as a Mana Tangata value, being a primary production industry. Recognise the national importance of the northern Waikato area in the domestic food supply requirements of New Zealand.
3.11.2 OBJECTIVES			
Objective 1	Support with amendment	Support the long term restoration and protection of water quality for each sub catchment and freshwater management units provided that where the attribute targets set for sub catchments are met, then maintenance is considered adequate.	Amend Objective 1 to reflect maintenance of water quality where applicable.
Objective 2 Social, economic and cultural wellbeing is maintained in the long term	Support	PC1 does not as proposed support the social, economic and cultural wellbeing of our communities. Land use flexibility is fundamental to sustainable horticultural production models or systems. Fresh produce is essential to community health and wellbeing. Availability and price dictate access to fresh produce.	Amend PC1 rules to ensure social, economic and cultural wellbeing is maintained.
Objective 3 Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and	Support in part/Oppose in part	We support short term improvements in water quality that are justified, measurable and achievable. Nitrogen has been given a dominant focus in this plan and the tool available to model this (OVERSEER) is questionable in terms of accuracy for horticultural systems. We consider the use of a Nitrogen Reference Point potentially	Amend PC1 rules to reflect sub-catchment approach to management addressing all four contaminants. Delete Nitrogen Reference Point and use of OVERSEER for commercial vegetable production systems.

Freshwater Management Unit		flawed in achieving water quality targets. We believe that the focus should be on all four contaminants on a sub catchment basis, concentrating on those contaminants of significant concern for each sub catchment.	
Objective 4 People and community resilience	Support in part	<p>We support this policy but do not consider that the current rule framework gives effect to the policy.</p> <ul style="list-style-type: none"> - Capping of land to a maximum area that will impact on business and community sustainability, access to fresh produce; - the introduction of a nitrogen reference point of questionable accuracy that will potentially lead to perverse outcomes such as contaminant trading; and impacts on the capital value of properties <p>We support the use of Farm Environment Plans and a sub catchment management approach.</p>	Amend PC1 rules to allow for sub catchment management approach. Remove capping of land and Nitrogen Reference Point.
3.11.3 POLICIES			
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	Support	We support the management of diffuse discharges for all four contaminants.	Retain as proposed
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	Support in part/Oppose in part	PVGA support the use of Farm Environment Plans that can utilise a toolbox of mitigations and current good or best management practice to address all four contaminants specific to each farms requirements.	Remove Nitrogen Reference Point from PC1. Recognise limitations of OVERSEER for use as a regulatory tool.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	Support in part/Oppose in part	PVGA support the tailored approach to reducing diffuse discharges for commercial vegetable production systems where Policy reflects the sector as essential industry, We do not support the use of a Nitrogen Reference Point, in the absence of a suitable modelling system being publicly available. We support utilising a tailored Farm Environment Plan that addresses all four contaminants equally and contributes to cumulatively address diffuse discharges on a sub-catchment basis. We do not support the capping of land in production.	Reflect Commercial Vegetable Production as an essential industry. Reflect requirement for land use flexibility in this industry. Delete requirement for maximum land area to be capped, delete requirement for Nitrogen Reference Point. Recognise sub catchment management approach.

Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	Support	We support enabling lower discharges to continue or to be established provided clarification is given as to what 'lower discharges' means.	Retain as proposed. cAlrify meaning of 'lower dischargers'.
Policy 5: Staged approach	Support	We support the staged approach but believe that there is a lack of information available to justify the approach taken within PC1, or that the 10 year attribute targets will be met based upon the current rule framework, particularly in relation to Nitrogen.	Retain as proposed. Amend rules within Plan to reflect justifiable gains to made in 10 year period. We support a sub-catchment approach to management of diffuse discharges.
Policy 6: Restricting land use change	Oppose	PVGA do not support restricting land use change for commercial vegetable production systems. This does not provide enough flexibility to ensure our sector can sustainably meet market demands and rotation requirements. Suitable soils and the right climatic conditions are essential for our industry. The northern Waikato is unique for growing and this land cannot be replaced elsewhere. As Auckland sprawls south, it is unlikely that we will be able to meet future population food demands unless we can utilise the northern Waikato soils, which is unlikely under this provision. Commercial vegetable production takes up less than 2% of the land area in the Waikato and Waipa catchments and we consider that while adopting tailored farm environment plans and working towards good and best management practices, we will have an insignificant effect if land use change is enabled. Land use change to commercial vegetable production will only happen when the market demands.	Amend Policy 6 to enable land use change flexibility for Commercial Vegetable Production systems, as an essential industry.
Policy 7: Preparing for allocation in the future	Support in part and oppose in part	We consider that Plan Change 1 should address and implement a sub catchment management approach, as opposed to addressing this in the future. While allocation is likely required to make this achievable, we do not support establishing a trading platform	Amend PC1 to address sub catchment management in this plan change.
Policy 8: Prioritised implementation	Support in part	PVGA seek clarification as to how sub catchments are prioritised. Where grower operations do not fit neatly within sub-catchments, it is considered necessary for commercial vegetable growing to be enabled across sub catchments.	Retain as proposed, but amend to enable horticultural enterprises to manage diffuse discharges between sub catchments.

Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	Support in part.	We support sub catchment management within this policy but consider that the collective management of diffuse discharges beyond the boundary on a sub catchment basis should be acknowledged.	Amend Policy 9 to reflect collective management of diffuse discharges on a sub catchment basis
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	Support.	We support Policy 11.	Retain as proposed.
3.11.5 RULES			
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	Support	We support Rule 3.11.5.1.	Retain as proposed.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	Support in part with clarification	<p>PVGA support the use of a Controlled activity consent (CA) where the consent is granted for a time period that enables certainty for growers going forward. We do not support the use of a maximum area however, if this provision is retained, seek clarification as to how land will move around the catchments under this framework.</p> <p>If the consent attaches the right to commercially grow vegetables to the parcel of land it is being undertaken on and not to the enterprise, which may be the case if the CA is considered to be a land use consent, meaning it cannot be rotated, there will be significant issues for our sector i.e. pests and disease, issues relating to leased land.</p> <p>If the land can be moved with the enterprise, and land is retired, will a residual nitrogen value be assigned to the retired land. We consider the NRP to be problematic.</p> <p>We support the use of FEP's and management on a sub-catchment basis.</p> <p>We do not support the use of a Nitrogen Reference Point.</p>	<p>Remove capping of land area and Nitrogen Reference Point.</p> <p>Clarify how land will be moved around the catchments if possible, and how nitrogen will be assigned to retired land if this provision is retained. Provide clarification as to how land will be moved and retired within the catchment under the proposed consent (if possible).</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	Oppose	PVGA do not support restricting land use change for commercial vegetable production. This does not provide enough flexibility to ensure our sector can sustainably meet market demands and rotation requirements. Suitable soils and the right climatic conditions are essential for our industry. The northern Waikato is unique for growing and this land cannot be	Lower activity status of Rule 3.11.5.7 from PC1 to restricted discretionary activity.

		<p>replaced elsewhere. As Auckland sprawls south, it is unlikely that we will be able to meet future population demands unless we can utilise the northern Waikato soils, which is unlikely under this provision. Commercial vegetable production takes up less than 2% of the land area in the Waikato and Waipa catchments and we consider that while adopting tailored farm environment plans and working towards good and best management practices, we will have an insignificant effect if land use change is enabled. Land use change to commercial vegetable production will only happen when the market demands.</p>	
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Auckland Council Visit
21 November 2014



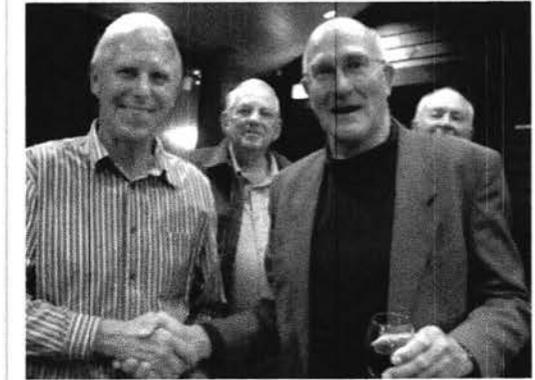
PUKEKOHE *Vegetable* GROWERS
ASSOCIATION

Pukekohe Vegetable Growers Association

The Pukekohe Vegetable Growers Association (PVGA) is a local organisation representing grower members from Warkworth in the north to Te Kauwhata in the south, with some grower members growing throughout many areas of New Zealand. This includes both indoor and outdoor vegetable crops.

The organisation was founded in the early 1900's. We have continued to represent the interests of growers since then and are privileged to have current members on the Executive Committee who are third generation grower members.

The PVGA is very active and represents some of the pre-eminent contributors to domestic and export vegetable production in NZ. We are affiliated to and enjoy a positive working relationship with Horticulture NZ Inc, our peak industry body.

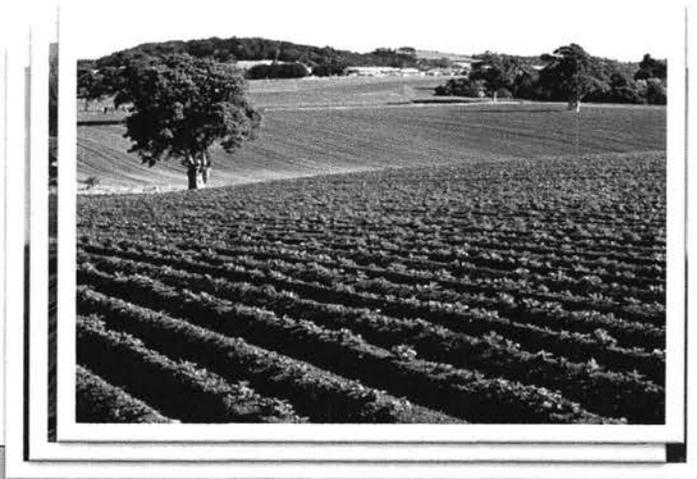


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Our Resources

The geographic area represented by the PVGA covers some of the most unique and important land resource in New Zealand. The combination of the valuable elite soils, favourable climate (that is relatively frost-free), access to sustainable water resources, and proximity to large populations means that the greater Franklin District is and will remain into the foreseeable future one of the most important areas of food production in New Zealand.

For growers, the land, soil and water are the fundamental elements of their livelihoods that allow them to intensively and sustainably grow fresh vegetables. There is no doubt that any negative impact on any of these key elements would have a detrimental impact on their businesses. The PVGA works closely with our grower members to help ensure that we are proactive and looking for ways to continually improve the way we manage the resources entrusted to us. We see ourselves as "tenants" of the land, with which comes the responsibility of ensuring the land is looked after and maintained for future generations of growers.



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Who we represent...

The PVGA is heavily engaged with its members and providing them representation.

We represent a very wide and diverse range of growers. The Franklin District has a very multicultural history in terms of its founding members and families of Chinese, Indian and European origin have all played significant parts over the past 120 years of vegetable production in the local district, and wider. This still remains the same to this day – with all of these ethnic groups prominent, as well as the addition of several other ethnicities.

Our members range from small niche orientated growers to large growers operating on a national basis. The majority of vegetable growing entities within the district have commonality in that they have very strong family bases.

Our industry is one of the largest employers in the Franklin District, both for permanent and seasonal labour. Once again, this encompasses a very wide ethnic mix.


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Activity

The PVGA Executive Committee meets monthly, on a purely voluntary basis, to discuss current issues that directly affect the growing community. A wide range of topics and issues are covered at these meetings, including:

- Environmental Matters
- Legislative Matters
- Market Related Topics
- Industry Research and Development
- Council – submissions and bylaws



The PVGA will often engage with other organisations at these meetings. We regularly meet with local body representatives - primarily for discussions in the areas of environmental and resource management issues. The PVGA is very effective at liaising with and communicating back to its members. Regular newsletters and emails are sent to growers and information can also be accessed via the association's website.

Activity

- Water Matters
 - Working closely with regional authorities and Iwi on water resource matters.
 - 4 Year water Use Efficiency Project – Environment Waikato..
 - Resource Allocations.
 - Water Quality.
 - Developing a Pukekohe / Pukekawa Long Term Vision (35 Year Outcomes).
 - Represented on the Healthy Rivers Collaborative Stakeholder Group (CSG).
 - Working with HortNZ to establish the South Auckland Fresh Water Enhancement Society.
- Auckland Spatial Plan
 - The PVGA were actively involved in ensuring that the rights of growers are continually protected. Our goal is to ensure that growers can continue to sustainably produce clean safe food for the nation.



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Activity

- Auckland Unitary Plan
Submission on behalf of grower members to deal with the specific needs of the local growing community and ensure growers are protected from changes due to urban sprawl.



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Achievements

The PVGA has achieved much in recent years, particularly in the area of environmental proactivity. The FSP "Doing it Right" is a world class document and well ahead of its time. It has been recognised and referenced by many Regional Councils throughout NZ and in several cases has been adopted by their policy makers in whole or part. This is a testament to the vision shown by the PVGA and the members involved in this project.

- Franklin Sustainability Project
 - Development ("Doing it Right" document)
 - Implementation
 - Green Ribbon Award
 - Update of document – now renamed as Erosion and Sediment Control for Vegetable Production.



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The Future

The PVGA aims to remain proactive on behalf of its growers. We seek to engage with our members, as well as key stakeholders, and look for ways to remain at the forefront of sustainable food production for local and international consumption.

