

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 by 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	T. A. REYNOLDS LTD
Full address	3 PUKEKOHE EAST ROAD PUKEKOHE
Email	admin@reynoldsproduce.co.nz
Fax	092385418 092389428

ADDRESS FOR SERVICE OF SUBMITTER	
Full name	PETER JOHN REYNOLDS
Address for service of person making submission	3 PUKEKOHE EAST ROAD PUKEKOHE
Email	peter@reynoldsproduce.co.nz
Fax	092385418 092389428 027 24 36210

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 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
Delete entire paragraph if you could not gain an advantage in trade competition through this submission.	

T A Reynolds Ltd
3 Pukekohe East Rd
Pukekohe 2120
Ph 09 238 5418

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.)

Land use Change Rules	VARIOUS
Fertiliser use and Application Rules and Summaries.	VARIOUS
Soil Control And Conditioning	VARIOUS
Farm Environment Plans	VARIOUS

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.)

SEE ATTACHED SHEETS

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:

SEE ATTACHED SHEETS.

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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

P. J. Reynolds.

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.

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T A REYNOLDS LTD PUKEKOHE

INTRODUCTION TO SUBMISSIONS TO WAIKATO REGIONAL PLAN CHANGE 1

T A Reynolds Ltd is a medium sized commercial vegetable growing; and cattle fattening operation based in the Franklin Area in the North East of the Waikato River Catchment.

We are a family operation owned and operated by seven brothers. Our family have owned land in Pukekohe since 1865. Our generation have been purchasing and leasing land in our own right since 1968. We have purchased or leased many blocks over the last 50 years and now farm on blocks in Pukekohe East, Harrisville, Buckland, Tuakau and Whangarata.

The crops we grow now are early spring potatoes; maincrop summer potatoes; onions; onion seed; pumpkins and squash; mustard and barley.

We have a cattle fattening operation on land that is not suitable for cropping and also rotate the cattle grazing in conjunction with our crop land fallow and resting regime.

We are highly regarded as farming in a sustainable manner and take great pride in our crop husbandry and land care and soil conditioning practices. We pay attention to detail in every phase of our cropping programmes. We use very best practice with regard to cultivation, fertilising, irrigating, harvesting, storage, packaging and transport.

We are involved in many discussion groups to enhance soils, crops, environment, and waterways. We participate in research by providing trial sites and hosting field days of growers, scientists and council members and staff.

The soil types on our farms are all volcanic clay loams – officially referred to as Patumahoe clay loams. The topography is flat to sloping with some areas slightly steeper. We have installed irrigation systems on all of the blocks we own and are able to irrigate some of our lease hold blocks. Our fertiliser regime is tailored to high yielding vegetable crops grown to a defined specification of size and quality. All our farms have been set up to avoid any silt runoff by using silt control structures or hedgerows surrounding the fields which prevent storm water entering the properties or leaving causing flooding and erosion.

On several of our farms we have preserved areas of mature native bush and are planting native trees and shrubs alongside streams which pass through our farms.

These provide habitat for wildlife and birds and improve water quality in the streams.

All of the land we farm is in the area of the North Eastern Portion of the Waikato River Catchment. Plan change 1 has been withdrawn from this area.

However we wish to make a general submission to plan change 1 as we feel the implementation of plan change 1 will have serious implications for our farming operations and have detrimental outcomes for our local communities and could seriously harm our ability to provide healthy, reasonably priced fresh vegetables to New Zealand and our Pacific Island Neighbours.

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SUBMISSIONS TO WAIKATO PLAN CHANGE 1

Land Use Change Rules

We need to have flexibility in our rotations between vegetable crops, arable and our grazing systems. Grassing down and grazing of cropping blocks can be for three or four years at a time.

Fertiliser Use And Application

We have developed fertiliser regimes in conjunction with former government bodies of MAF, which is now MPI; DSIR which is now Plant and Food; fertiliser suppliers; private agronomists; fertiliser equipment manufacturers. We have been cropping on the Franklin soils for 50 years and have many years experience of crop nutrition requirements. We have a vast amount of fertiliser use records, soil testing data and crop yield data. Data from field trials shows minimum leaching or movement of fertiliser in our soil types. The Council need to work with industry partners to achieve the best outcomes and not try and impose the 'OVERSEER' system which is regarded as inaccurate for vegetable production.

Soil Control and Conditioning

We have developed systems for cultivation and conditioning of our soils, with modern cultivation techniques, as well as proven traditional methods. Soil control measures under heavy rainfall and flooding events are in place on all farms. These have been developed through our own experience and involvement with other growers, and industry partner demonstration sites and discussion days.

Farm Environment Plans

We are already operating under the New Zealand GAP scheme for vegetable production. This is an audited scheme and should be enough to satisfy the F.E.P. requirement. The description of the F.E.P. under plan change 1 is very complex and will require an enormous amount of time and expense to complete. This will be handled easily by large operations and corporates who can employ personnel or consultants to produce the F.E.P. Smaller operators will be disadvantaged as the time and money spent will have to be absorbed into an already busy workload.

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	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 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. † ONIONS 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	Maintaining social, economic and cultural wellbeing must be a cornerstone objective in PC1.	Retain as proposed.
Objective 3 Short-term improvements in water quality in the first stage of restoration and protection of water	Support in part	It is agreed that a 10% reduction should be sought overall but targeted reductions required for vegetable growing should be fair.	Amend the plan to provide flexibility to land managers seeking to achieve reductions collaboratively at a catchment or subcatchment scale. T A Reynolds Ltd 3 Pukekohe East Rd