

18 OCT 2019

06087

To: Horizons Regional Council

Name of Submitter:

Trub Bros

This is a submission on the following proposed plan: Proposed Plan Change 2 – Existing Intensive Farming Land uses

I could not gain an advantage in trade competition in making this submission.

The specific provisions of the proposal that my submission relates to are:

- Policy 5-8 Management and Regulation of intensive farming land^ use activities affecting groundwater and surface water^ quality
- Policy 14-3 - ~~Industry-based standards~~ Good management practices*
- Policy 14-5 - Management of intensive farming land^ uses
- Policy 14-6 - Resource consent decision-making for intensive farming land^ uses
- Rules 14.1 - Agricultural Activities

My submission is:

- Not all rural production activities are equal in value to the community or equal in environmental effect. The value of vegetable growing is not reflected in proposed Plan Change 2. A tailored approach is required for commercial vegetable production if land with high production value is to be realised for its food production purpose, while achieving catchment wide water quality improvements.
- The assessment process underpinning the proposed Plan Change 2 is not adequate to justify driving land use change away from vegetable growing or requiring vegetable growers to invest in uncosted innovations and measures, to achieve unquantified outcomes.
- I support requiring all growers to operate at good management practice.
- I propose provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations.

I wish to be heard in support of this submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of submitter

Dated: 20 August 2019

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