

18 OCT 2019

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To: Horizons Regional Council

Name of Submitter: Ohakune Growers Association

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:

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

The One Plan and Plan Change 2 and the impact on vegetable growing

The Ohakune Growers Association represents 11 growers, growing across an area of 1500 hectares. The crops grown within the area Ohakune Growers Association represents are potatoes, carrots, swedes, parsnips, brussel sprouts, beetroot, cauliflower, cabbage and broccoli.

The One Plan defines all vegetable growing as intensive farming. The Environment Court, included vegetable growing in this provision. The One Plan Section 32a assessment did not assess the impact of the intensive farming rule on commercial vegetable growing.

Growers want to work with Regional Council to develop policies and rules that are workable for vegetable growing. Growers want to see an outcome, where growers:

- contribute to improved freshwater quality, ecosystem and cultural outcomes,
- have sustainable businesses that employ local people, and
- continue to grow the vegetables that support the health and wellbeing of the New Zealand population, and
- can expand to meet the demands of population growth.

Comments on Plan Change 2 provisions

- The proposed update to leaching maximums, will not provide a controlled or RDA consenting pathway for vegetable growers under the intensive farming rules.
- The One Plan policy refers to the productive capability of land, but the One Plan caps productivity at dairy farming by applying leaching maximums calculated for dairy farms for all activities deemed intensive farming.
- Vegetable growing is a more productive land use than dairy farming. Vegetable growing occupies the land with the highest potential productive capacity.

- The leaching maximums in the One Plan strip the productive capacity of some of the most highly productive land in New Zealand.
- The One Plan and Plan Change 2, undermine the potential of the highly productive land resource within target catchments, to provide for the essential health needs of New Zealanders now and in the future.
- Not all rural production activities are equal in value to the community or equal in environmental effect (for example, jobs per hectare and food provided). The value of vegetable growing is not reflected in proposed Plan Change 2.
- We propose a tailored approach for commercial vegetable production. This is required 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. Nor is it adequate to justify requiring vegetable growers to invest in uncostered innovations and measures, to achieve unquantified outcomes.
- We support requiring all growers to operate at good environmental management practice.
- We proposed provisions be added to enable existing areas of vegetable growing to move onto different land. This provision is required for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations where lease arrangements provide that opportunity.
- Enabling growers to move areas of growing onto new land will provide certainty for growers who rotate in pastoral farming systems, outside of target water management zones, such as those in Ohakune, that they can rotate crops and remain permitted activities; as well as provide for expansion with population growth.

The Ohakune Growers Association wish to be heard in support of this submission.

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



**Ron Frew, President of Ohakune Growers Association,
Ohakune Growers Association.**

Dated: 18 October 2019

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