

18 OCT 2019

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Form 5 – Submission on a Publicly Notified Plan Change under Clause 6 of the First Schedule to the Resource Management Act 1991

To: The Manawatu-Whanganui Regional Council

Submission on Plan Change 2 – Existing Intensive land Uses to the One Plan (the combined Regional Policy Statement and Regional Plan for the Manawatu-Whanganui Regional Council)

Submitter Details:

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We could not gain an advantage in trade competition.

Submission Details

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

- Table 14-2
- Consent Pathway
- Good Management Practices

The submissions of the Arawhata Wetland Alliance Group (AWA Group) are set out below:

Introduction

The interests of the AWA Group relate to the integrated management of land and water resources in the Hokianga Water Management Subzones (WMSZ), as well as implications of the proposed changes on the integrated management of other catchments within the Horowhenua District.

The AWA Group is committed to reducing nitrogen leaching amounts in the Hokianga WMSZ - in a way, and at a rate, which allows for *economic and sustainable production* and generally in accordance

with a robust, feasible transition plan with specifically defined pathway(s) and outcomes, which will meet the One Plan's freshwater quality objectives.

Background

The Hokio Catchment is identified in the One Plan as a target catchment due to its degraded water quality values. Historically high levels of e-coli, nitrate and sediment have been found in the Arawhata, Patiki, Mangahou Streams and Lake Horowhenua. Land use activities which have collectively contributed to the degraded water quality outcomes include residential, business, industrial, industrial and municipal Facilities, pastoral farming (dairying) and commercial vegetable growing.

The AWA Group believes that the Manawatu-Whanganui Regional Council has a statutory duty to ensure that Plan Change 2 provisions are effective, workable and achieve the environmental outcomes sought, and thereby consistent with the purpose of the Resource Management Act 1991 (the Act).

The AWA Group is concerned that the implications for existing intensive farming activities in the Hokio Catchment have not been assessed within the Section 32 Report and that it fails to take account of the positive and beneficial effects of the existing, nationally important commercial vegetable growing activities in the proposed regulatory framework. The AWA Group is particularly concerned that failure to gain consents for existing commercial vegetable growing under One Plan (Plan Change 2) could result in the loss of 15% of New Zealand's fresh cut vegetable supply, the loss of over 500 jobs to the region and the estimated loss of \$50 Million in terms of economic impacts. A consequential, reasonably foreseeable outcome would be the conversion of existing horticulture blocks to dairy farming which could lead to further degradation of the waterways in the Hokio WMSZ.

In view of these concerns the AWA Group submits that Plan Change 2 is not appropriate and is not consistent with the purpose of the Act; it will not meet the reasonably foreseeable needs of future generations; and it will not enable the social, economic, and cultural well-being of both people and communities, and their health and safety. The AWA Group seeks that Plan Change 2 be withdrawn.

Specific Submission Points:

Submission Point 1:

The AWA Group is concerned that Proposed Plan Change 2 (PC2) forecloses opportunities for farmers, communities, industry, Councils to partner on multi-stakeholder mitigations for the Hokio Catchment and/or sub-catchment proposals, which could substantially reduce overall N leaching rates and remove sediment, phosphorus and nitrates leading to improved water quality and environmental outcomes, across a 10 year planning horizon.


Submission Point 2:

The AWA Group is concerned about the lack of consultation with Horowhenua producers on PC2 and the short timeframe provided to digest the proposed changes, consider and assess the feasibility of future options and different consent pathways. The AWA Group believes that in the rush to produce

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

Signature

(Person authorised to sign on behalf of submitters)

A handwritten signature in black ink, appearing to read 'B. Duffy', written in a cursive style.

Brendan J Duffy (Chairperson of the Arawhata Alliance Group)

Matt Sword

Dr Jonathan Procter

Dated: 18 October 2019

this plan change that Horizons has also missed a valuable opportunity to work with key stakeholders on mitigations and foreclosed on innovation mobility, which is fundamental to explore and understand options to achieve improved environmental outcomes in target catchments and Hokio and Waikawa WMSZ's.

Submission Point 3:

In the short time between the notification of Plan Change 2 and the closing date for submissions, the AWA Group - working with expert advisors - has made significant progress on developing a longer term community mitigation plan to improve the water quality and environmental values of the Hokio Catchment. While the proposed mitigation plan is still in a formative state, the AWA Group believe that the integrated management plan and interventions, will achieve amongst other things:

- Improved water quality, helping local water bodies move towards levels established in the National Policy Statement for Fresh Water;
- Alignment with community, Iwi and local environmental lobby stakeholder interests who want to see freshwater improvements and commercial vegetable growing continue in the Horowhenua District, where it has an economic comparative advantage;
- Help secure the future of the commercial vegetable growing industry in the Horowhenua District, the retention of 500 jobs and \$50mil per annum;
- Protect the supply of 62,000 tons of healthy, affordable vegetables to the domestic economy. (This local supply comprises 15% of national production. Anecdotally, a consumer buys a product grown in the Horowhenua somewhere in New Zealand on average every .6 seconds);
- Enable the most efficient farming system to take place on soils which are best suited for commercial vegetable growing and where there is a proven climate advantage and avoids the potential conversion of land to a farm system (dairy farming) which has greater environmental impacts; and
- Restoration of the ecological, cultural and freshwater values of the sub-catchment through implementing a comprehensive and integrated environmental mitigation, involving the creation of a large-scale wetland conservation area and habitat regeneration supporting local flora and fauna. *An example of a treated mitigation is attached to this submission.*

We seek the following decision from the Manawatu – Whanganui Regional Council:

That Plan Change 2 be withdrawn.

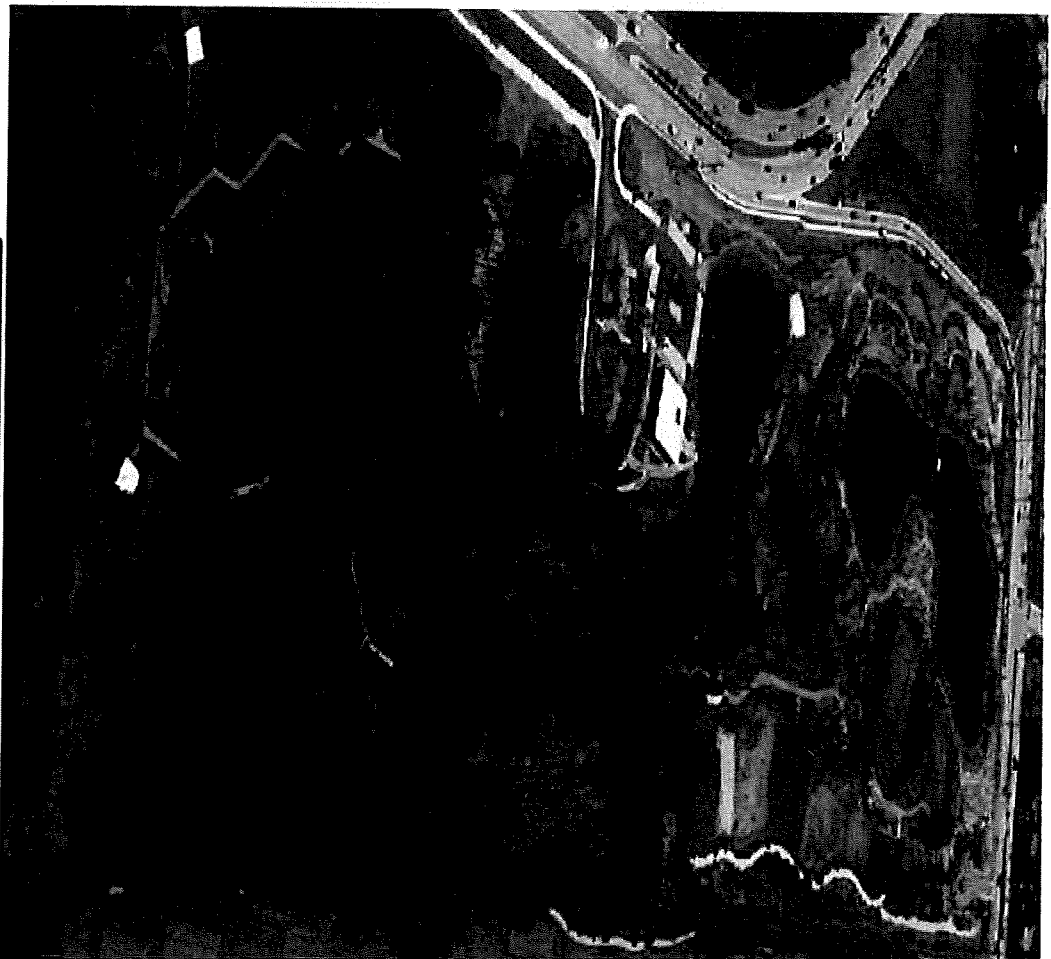
Or in the alternative, transitioned to a collaborative planning process as set out in Part 4, Schedule 1 of the Resource Management Act 1991;

Or in the alternative, without prejudice to the decision requested, such other relief that will achieve the reasons for the AWA Group's submission.

Submission at the Hearing

We wish to speak in support of our submission.

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