

21 OCT 2019

To: Horizons Regional Council

06121

Name of Submitter: Tararua 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:

- 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
- Proposed provisions and definitions proposed by the HortNZ submission.

#### **Tararua Growers Association**

The Tararua Growers Association represents growers on the west side of the Tararua's between Otaki and Rangitikei. The group advocates for growers interests and provides a community support network for growers.

The Tararua Growers Association was formed in 2010. The Association was formed by amalgamating Otaki, Levin, Opiki, Rangitikei, Horowhenua Fruit Growers and Palmerston North Grower Associations.

Tararua Growers Association is a source of grower knowledge for:

- Industry groups including HortNZ, Vegetables NZ, Potatoes NZ, Onions NZ and Asparagus NZ,
- Regional and District Councils,
- Iwi and Hapu, and
- Other community groups.

Vegetables are grown in different rotations throughout the Manawatu/Whanganui Region. These different rotations are designed for the different soils and climates. They produce different crops at different times of the year. These growing systems include:

- potatoes and carrot growing within pasture rotations on extensive sheep and beef farms in the Ohakune area,
- potatoes and onion growing within pasture rotations on dairy farms in the Manawatu,
- long-duration asparagus rotations in the Manawatu, and
- green vegetable rotations, that produce year-around vegetables, in the Horowhenua District.

The Chinese growing community in the Horowhenua has a valued history and ongoing role growing fresh green vegetables. There are approximately 100 vegetable growers within the region, approximately 80% of which are within the area that the Tararua Vegetable Growers

Association represents. We estimate that 40 of these growers grow vegetables on the highly productive land within the target catchments.

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

The Tararua Growers Association, and vegetable growers from the north of the Region, worked alongside Horticulture New Zealand through the One Plan process.

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.

Across the area that the Tararua Vegetable Growers Association represents, outdoor vegetable growing contributes approximately \$100 million in GDP and 800 jobs. Specific to the Horowhenua District economy, outdoor vegetable growing contributes approximately \$50 million in GDP and 500 jobs.

The proposed Plan Change 2 puts the vegetables growing businesses that make this contribution at risk. A loss of jobs within the Horowhenua District, which has an unemployment rate of 8.4%, (over double the national average of 4%), would cause poverty and hardship for local people.

Growers want to work with the 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 uncosted innovations and measures, to achieve unquantified outcomes.
- We support requiring all growers to operate at good environmental management practice.
- There is 1135.78ha LCDB<sup>1</sup> Short Rotation Cropland within the Horowhenua FMU. Of this area, 993.37ha (or 87.4%) is registered to have Farm Environment Plans independently audited by the NZGAP Environmental Management System (EMS). These growers are working with HortNZ and Vegetables NZ to update and improve their existing Farm Plans, so they will meet the NZGAP EMS auditing standards.
- 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 Tararua 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



**Terry Olsen, President of Tararua Growers Association,  
Tararua Growers Association.**

Dated: 7 October 2019

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<sup>1</sup> New Zealand Land Cover Database

