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FURTHER SUBMISSION ON

Horizons One Plan - Proposed Plan Change 2

(Existing Intensive Farming Land Uses)

3 December 2019

TO: Horizons Regional Council

NAME OF SUBMITTER: Horticulture New Zealand



CONTACT FOR SERVICE:

Michelle Sands
Manager – Natural Resources and Environment
Horticulture New Zealand
PO Box 10-232 WELLINGTON
Ph: 04 470 5664
Email: Michelle.Sands@hortnz.co.nz

FURTHER SUBMISSION ON HORIZONS PLAN CHANGE 2

1. Horticulture New Zealand's (HortNZ) further submissions are contained in the attached Table 1.
2. HortNZ represents commercial fruit and vegetable growers in the Manawatu Whanganui Region, so represents a relevant aspect of the public interest.
3. HortNZ is not a trade competitor and could not gain any advantage in trade competition through this further submission.
4. HortNZ wishes **to be heard** in support of its further submissions.
5. If others make similar submissions, HortNZ **will consider** presenting a joint case with them at the hearing.

Table 1: Further submissions on behalf of HortNZ on submissions to Horizons Plan Change 2

(1) Support or oppose the submission of:		(2) The particular parts of the submission I support or oppose are:		(3) The reasons for my support or opposition are:		(4) I seek that the whole or part (as per column 2) of the submission be allowed or disallowed:
Submitter	Sub No.	Plan Provision	Support / oppose	Reason	Decision Sought	
DairyNZ Limited	40.1	Policy 5-8	Support in part	HortNZ support recognition that this is an interim plan change only, and support changes to make the framework more workable.	Allow submission in part, subject to refinements to provide for commercial vegetable growing.	
	40.3	Method 5-13	Support in part	HortNZ support changes that clarify that Table 14.2 are interim; in our view the table is not applicable to commercial vegetable growing	Allow submission in part, subject to refinements to provide for commercial vegetable growing.	
	40.5	Policy 14-5	Support in part / Oppose in part	HortNZ support changes to provide clarity on the approach to be taken for applications not consistent with the approach set out in Policy 14-5. The Dairy Farm Overseer Leaching maximums are not relevant to commercial vegetable production, and should not be used as a limit for this activity.	Allow submission in part. Provide a specific consenting pathway for commercial vegetable growing.	
	40.6	Policy 14-6				
	40.8	Rule 14-1	Support in part/oppose in part	HortNZ support the intent of the submitters amendments to provide reasonable consent pathway for those who cannot meet Table 14.2	Allow submission in part. Provide a specific consenting pathway for commercial vegetable growing.	
	40.9	Rule 14-2	Support in part/oppose in part	HortNZ support a rule package that differentiated between commercial vegetable production (with its own rules) and other activities being subject to the existing.		

40.10	Rule 14-2A		Support in part	HortNZ support retention of a Discretionary Activity pathway, where the Controlled or Restricted Discretionary activities cannot be met. However, HortNZ support a rule package that differentiates between commercial vegetable production (with its own rules)	Allow submission in part. Provide a specific consenting pathway for commercial vegetable growing.
40.11	Good management practices		Support in part	HortNZ support a definition for GMP that takes into account that this is an evolving concept/set of practices.	Allow submission in part. Provide a specific consenting pathway for commercial vegetable growing.
40.13	New definition – Nitrogen baseline		Oppose	The application of a nitrogen baseline approach would need to be considered with a specific regulatory approach for Commercial Vegetable Growing noting that a nitrogen baseline for commercial vegetable growing would need to accommodate a rotational growing system for CVP.	Allow submission in part. Provide a specific consenting pathway for commercial vegetable growing.
40.14	New definition – 75 th percentile nitrogen leaching loss		Oppose	HortNZ seek alternative provisions, such that commercial vegetable growing. The 75 th percentile approach is not relevant to commercial vegetable growing, because different crops and growing systems have different leaching risks and are not comparable.	Disallow the application of the 75 th percentile nitrogen leaching loss commercial vegetable growing.
42.1	Entire plan change	Horowhenua District Council	Support in part	HortNZ supports a collaborative planning process for the Horowhenua FMU. The unique environment and values in the Horowhenua require a tailored planning approach to implement the NPSFM	Allow submission
43.1 43.2 43.3	Entire plan change	Ohakune Growers Association	Support	HortNZ support a tailored approach for commercial vegetable production, requiring all growers to operate at good environmental management practice and provisions that enable existing areas of vegetable growing to move onto different land.	Allow submission
55.2	Nutrient management plan	Wellington Fish and Game Council	Oppose	HortNZ seeks an alternative framework for commercial vegetable growing that rely on Farm Environment Plans through the NZ GAP EMS. Noting the current difficulties in modelling on farm nutrient losses from commercial	Disallow submission

				vegetable growing, OVERSEER is not a suitable regulatory tool for commercial vegetable growing.	
55.5	Policy 14-6	Oppose		HortNZ support good management practices as a means of improving water quality outcomes.	Disallow submission
55.6	Rule 14-1	Oppose		HortNZ support good management practices and seek to retain this concept in a tailored regulatory package for commercial vegetable growing.	Disallow submission
55.7	Rule 14-2A	Oppose		HortNZ does not support a requirement for public notification in a tailored regulatory package for commercial vegetable growing.	Disallow submission
57.1	New policy	Support in part		Like this submitter, HortNZ support the intent to provide a workable, tailored approach for commercial vegetable production.	Allow in part. Provide for pathway for commercial vegetable growing
57.2	New Controlled Activity pathway and new Table 14.3				
57.3	Merge PPC2 with PPC3 and new rule for New CVG outside WMSZ				
57.4	Addition of a restricted discretionary activity pathway for existing Commercial Vegetable growing inside the WMSZ				
57.5	Addition of caps or small reductions required for Land Users below values on Table 14.2 to ensure N loss cannot increase eroding the value of cuts made by users exceeding Table 14.2				
57.6	Link the Rules to the land areas that existed as at 2017/2018 rotation				
57.7	New rule for expansion of CVG inside WMSZ				
58.1	Policy 5-8	Support in part / Oppose in part		The submitter, like HortNZ, seek changes that make the policy more workable and outcome focused; there needs to be a reasonable consent pathway for those who cannot meet Table 14.2.	Allow submission in part. Provide for commercial vegetable growing.

				The Dairy Farm Overseer Leaching maximums are not relevant to commercial vegetable production, and should not be used as a limit for this activity.	
58.2	Policy 5-8		Support in part	HortNZ supports changes for new intensive farming if there is scope, provided this is consistent with the outcomes sought in HortNZ's submission.	Allow submission in part. Provide for commercial vegetable growing.
58.4	Method 5-13		Support in part	HortNZ agree that Table 14.2 is not an enduring solution and support the ability to use alternative nutrient management models and tools. There is a need to recognise the current difficulties in modelling on farm nutrient losses from commercial vegetable growing.	Allow submission in part. Provide for commercial vegetable growing.
58.7	Policy 14-5		Support in part / Oppose in part	HortNZ support greater clarity with regard to the foot notes and the explicit recognition that PC2 is interim and that robust future plan changes are required in addition to PC2 to implement the NPSFM	Allow submission in part. Provide for commercial vegetable growing.
58.9	Policy 14-6			The submitter, like HortNZ, seek changes that make the policy more workable and outcome focused; there needs to be a reasonable consent pathway for those who cannot meet Table 14.2.	
				The Dairy Farm Overseer Leaching maximums are not relevant to commercial vegetable production, and should not be used as a limit for this activity.	
58.11	Table 14.1		Support in part	HortNZ support changes to the date by which consents must be lodged to reflect the current process and be realistic	Allow submission in part. Provide for commercial vegetable growing.
58.12	Table 14.2		Support in part/oppose in part	HortNZ support changes which will add clarity to the applicability of Table 14.2 (and the interim nature). Notwithstanding Table 14.2 should not be applied to commercial vegetable growing.	Allow submission in part. Provide for commercial vegetable growing.
58.13	Rule 14-1		Support in part/oppose in part	HortNZ support the intent of the submitters amendments to provide reasonable consent pathway for those who cannot meet Table 14.2	Allow submission in part. Provide for commercial vegetable growing.
58.14	Rule 14-2				

				HortNZ support a rule package that differentiated between commercial vegetable production (with its own rules) and other activities being subject to the existing	
58.15	Rule 14-2	Support in part		HortNZ supports changes for new intensive farming if there is scope, provided this is consistent with the outcomes sought in HortNZ's submission.	Allow submission in part. Provide for commercial vegetable growing
58.16	Rule 14-2A	Support in part		HortNZ support retention of a Discretionary Activity pathway, where the Controlled or Restricted Discretionary activities cannot be met. However, HortNZ support a rule package that differentiates between commercial vegetable production (with its own rules) and other activities being subject to the existing.	Allow submission in part. Provide for commercial vegetable growing
58.17	Rule 14-2A	Support in part		HortNZ agree there is a need to provide for new, in addition to existing activities HortNZ support a rule package that differentiates commercial vegetable production (with its own rules) from other activities.	Allow submission in part. Provide for commercial vegetable growing
58.19	Good management practices	Support in part		HortNZ support the definition of GMP	Allow submission in part. Provide for commercial vegetable growing
58.20	Nutrient management plan	Support in part/oppose in part		HortNZ seeks an alternative framework for commercial vegetable growing that rely on Farm Environment Plans through the NZ GAP EMS. Noting the current difficulties in modelling on farm nutrient losses from commercial vegetable growing, OVERSEER would not be appropriate for commercial vegetable growing.	Allow submission in part. Provide for commercial vegetable growing
58.21	New definition – nitrogen baseline	Oppose		The application of a nitrogen baseline approach would need to be considered with a specific regulatory approach for Commercial Vegetable Growing noting it would need to accommodate rotational growing system for commercial vegetable growing.	Allow submission in part. Provide for commercial vegetable growing

	58.22	New definition – 75 th percentile nitrogen leaching loss	Oppose	A definition for 75th percentile nitrogen would need to be determined by reference to the relevant sector. The 75th percentile approach is not relevant to commercial vegetable growing, because different crops and growing systems have different leaching risks and are not comparable. (	Disallow the application of the 75th percentile nitrogen leaching loss commercial vegetable growing. Allow submission
Tararua Growers Association	60.1 60.2 60.3	Entire plan change	Support	HortNZ support a tailored approach for commercial vegetable production, requiring all growers to operate at good environmental management practice and provision that enable existing areas of vegetable growing to move onto different land.	Allow submission
Water Protection Society	65.1-18	Policy 5-8	Oppose	HortNZ oppose Policy 5-8 applying to commercial vegetable growing, particularly the requirement to transition away from intensive land use (including within the timeframes proposed by the submitter), which is not appropriate for commercial vegetable growing. The nitrogen leaching maximums in the One Plan are not appropriate for commercial vegetable growing.	Disallow submission, and provide for commercial vegetable growing
Beef + Lamb New Zealand	74. 5	Policy 5-8	Oppose	HortNZ opposes this submission on the basis that a specific workable policy (and rule) framework is required for commercial vegetable growing.	Allow submission in part. Provide for commercial vegetable growing
	74. 7	Good management practice	Support in part	HortNZ supports the principle of good management practice (or in the alternative a definition based on the 2018 Good Farming Practice Action Plan)	Allow submission in part. Provide for commercial vegetable growing
	74.8	Method 5-13	Support in part	HortNZ supports changes which enable uncertainty to be built in, not left to future PC's	Allow submission in part. Provide for commercial vegetable growing
Potatoes New Zealand	75.1	New policy 5-8A	Oppose	HortNZ prefer management at the FMU level and do not support Table 14-2A.	Disallow submission

75.2	Policy 5-8 (i) (B) and (C)	Support in part/oppose in part	HortNZ support recognition of commercial vegetable production in the policy framework, however we prefer a framework specific to commercial vegetable growing	Allow in part, but provide for commercial vegetable growing in a separate framework
75.3	New policy 14-5A	Oppose	HortNZ support the intent of providing a tailored response that provides for commercial vegetable growing however the policies proposed are not appropriate for the entire sector.	Disallow submission
75.4	New policy 14-6A	Oppose	HortNZ support the intent of providing a tailored response that provides for commercial vegetable growing however the policies proposed are not appropriate for the entire sector.	Disallow submission
75.5	New table 14-2A	Oppose	The proposed Table 14.2A values are not workable for the entire vegetable sector.	Disallow submission
75.6	New rule 14-1AA	Support in part	HortNZ support the intent of providing a tailored response that provides for commercial vegetable growing, however HortNZ do not agree that the permitted activity rule should be limited to those less than 4.1 hectares and should also be for existing growers outside the target WMSZ. This activity status may change in the future when Horizons develop a future Plan Change to implement the NPSFM, or if a NES for commercial vegetables is developed.	Allow in part
75.7	New rule 14-1A	Oppose	HortNZ support the intent of providing a tailored response that provides for existing commercial vegetable growing however we do not support linking this rule to Table 14.2A.	Disallow submission
75.8	New rule 14-2AA	Support in part/oppose in part	HortNZ support the intent to provide for expansion of extensive rotations within environmental limits but the drafting is unclear and would capture many existing growers not just new growing areas.	Disallow submission
75.9	New rule 14-2B	Oppose	HortNZ support the intent of providing a tailored response that provides for commercial vegetable	Disallow submission

				growing however the meaning of the area this rule applies to is unclear and the rule is linked to 14.2A	
75.10	New rule 14-2C		Oppose	HortNZ support the intent of providing a tailored response that provides for commercial vegetable growing however the meaning is unclear and as drafted would capture many growers.	Disallow submission
75.11	Good management practice		Support in part/Oppose in part	HortNZ support the insertion of manage, but do not see measure as necessary.	Allow in part
75.12	Nutrient management plan		Support in part	HortNZ prefer the HortNZ Code of Practice for Nutrient Management and is seeking Farm Environment Plans, based on the NZGAP EMS. However, the proposed change provides for further flexibility.	Allow in part, but provide for commercial vegetable growing in a separate framework
75.13	New definitions – Baseline commercial vegetable growing area; Crop rotation		Support in part/Oppose in part	HortNZ support vegetable growing being located on highly productive land, but the drafting is unclear and HortNZ prefer management at the FMU level. We support the crop rotation definition.	Allow in part
75.14	Schedule B		Oppose	HortNZ oppose the removal of the domestic food supply value, in those catchments where the quality of water must be managed to provide water of a suitable quality for irrigating vegetable crops. HortNZ support the intent of recognising the value of commercial vegetable production on highly productive land, however in our view this is a Social/Economic value, not a Water Use value. We would support refinement of the Social/Economic values to support commercial vegetable production and domestic food supply.	Disallow submission
75.15	Proposed schedule X		Support in part/Oppose in part	HortNZ is seeking Farm Environment Plans, based on the NZGAP EMS.	Disallow submission