

# Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

Submission form on publicly notified – Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

SubForm	PC12016	COVER SHEET	
<b>FOR OFFICE USE ONLY</b>			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

SUBMISSIONS CAN BE	
<b>Mailed to</b>	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
<b>Delivered to</b>	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
<b>Faxed t</b>	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
<b>Emailed to</b>	<a href="mailto:healthyrivers@waikatoregion.govt.nz">healthyrivers@waikatoregion.govt.nz</a> <i>Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.</i>
<b>Online at</b>	<a href="http://www.waikatoregion.govt.nz/healthyrivers">www.waikatoregion.govt.nz/healthyrivers</a>
<b>We need to receive your submission by 5pm, 8 March 2017.</b>	

YOUR NAME AND CONTACT DETAILS		
Full name Makan Daya & Co Ltd		
Full address 2364 Buckland Road, Tuakau		
Email n.makan@xtra.co.nz	Phone 0274961680	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name Arjune Dahya		
Address for service of person making submission 9a Edwards Court, Pukekohe		
Email arjunedahya@xtra.co.nz	Phone 02102298763	Fax

TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
<input type="checkbox"/> I could / <input checked="" type="checkbox"/> could not gain an advantage in trade competition through this submission.
<input checked="" type="checkbox"/> I am / <input type="checkbox"/> am not directly affected by an effect of the subject matter of the submission that:
(a) adversely affects the environment, and
(b) does not relate to the trade competition or the effects of trade competition.
Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

**THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO**

*Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1  
(continue on separate sheet(s) if necessary.)*

Chapter 3.11: Area covered by Chapter 3

**I SUPPORT OR OPPOSE THE ABOVE PROVISION/S**

*(select as appropriate and continue on separate sheet(s) if necessary.)*

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

**MY SUBMISSION IS THAT**

*Tell us the reasons why you support or oppose or wish to have the specific provisions amended.  
(Please continue on separate sheet(s) if necessary.)*

Withdraw PC1 altogether to allow for consultation with Hauraki iwi before any further proposed plan change to given area.

Re-notify PC1 with the inclusion of the withdrawn area relating to Hauraki iwi so that the catchment can be considered and so submissions and evidence can be co-ordinated for the whole catchment area.

**I SEEK THE FOLLOWING DECISION BY COUNCIL**

*(select as appropriate and continue on separate sheet(s) if necessary.)*

- Accept the above provision
- Accept the above provision with amendments as outlined below
- Decline the above provision
- If not declined, then amend the above provision as outlined below

*Amend as follows:*

**PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION**

I wish to speak at the hearing in support of my submissions.

I do not wish to speak at the hearing in support of my submissions.

**JOINT SUBMISSIONS**

If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

**IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW**

Yes, I have attached extra sheets.

No, I have not attached extra sheets.

**SIGNATURE OF SUBMITTER**

*(or person authorised to sign on behalf of submitter)*

*A signature is not required if you make your submission by electronic means.*

Signature Arjune Dahya

Date 8 March 2017

Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

- I confirm that I am authorised on behalf of Makan Daya & Co Ltd to make this submission.
- Makan Daya & Co Ltd wishes to be heard in support of this submission.
- Makan Daya & Co Ltd supports the Horticulture New Zealand Submission that relates to the vegetable growing sector.
- If other parties make similar submissions, Makan Daya & Co Ltd would not consider presenting a joint case with those parties at the hearing.
- Makan Daya & Co Ltd will not gain a trade competition advantage through this submission. Makan Daya & Co Ltd will be directly affected by adverse effects that will result if Proposed Waikato Regional Plan Change 1-Waikato and Waipa River Catchments becomes operative in its current form. These adverse effects do not relate to trade competition or the effects of trade competition as defined by the Resource Management Act 1991.

## General Comments

- Makan Daya & Co Ltd has taken the opportunity to submit on the Proposed Waikato Regional Plan Change 1- Waikato and Waipa River Catchments as we are concerned for the future progression of our business and surrounding environment.
- Makan Daya & Co Ltd has been commercially growing vegetables since 1963. Currently being cropped by second, third and fourth generation members following a strict New Zealand Good Agricultural Practice programme.
- Makan Daya & Co Ltd has heavily invested economic, social and financial inputs to ensure good agricultural practices are implemented and retained to reduce discharges outside the farm boundary and to ultimately protect the environment.

## Evidence to Support Submission

- Sediment Control
  - Silt pond/ traps at various locations on property(s)
  - Native plantings on steep banks to prevent surface run-off into streams and waterways
  - Raised access ways to ensure sediment remains on property and does not flow onto council land/ drains/ roading
- Soil Preparation in adequate conditions
  - Use of CLC rippers to work only top half of soil profile to promote minimum tillage which reduces run-off and leaching of sediment from the paddocks that eventually lead into underground aquifers and waterways
- Use of green manure crops to add “natural” nutrients back into the soil profile therefore a reduction in the need to use high nitrogen fertiliser products during the growing season
- Use of complex, slow-release fertiliser products that are high in Calcium, Potassium, Magnesium and Sulphur to provide slow release nutrients rather than quick release nitrogen and phosphorus products, preventing leaching into waterways
- Annual calibration of fertiliser applicator machinery to ensure correct amounts of product is being applied. This minimise over-application that leads to increased leaching into streams and waterways.
- Use of GPS systems creating permanent tracks, this therefore enables traffic control within the farm boundary that will significantly reduce leaching and run-off into waterways
  - Wheel track ripping at a depth of 10cm to prevent run-off/ erosion. This increases sediment control resulting in less leaching into waterways
  - Contouring paddocks (benched headlands) to ensure surface run-off is diverted into silt traps and not waterways.
- Annual/ Bi-annual application of certified compost to soil. The use of compost improves soil structure, drainage and retention of microbial activity resulting in higher yields with less inputs of fertiliser products, leading to less leaching in waterways
- Intensive crop rotations to prevent build-up of pests and diseases that could find their way into waterways and neighbouring properties that will lead to biosecurity issues in the Waikato region.

## Additional sheet to assist in making a submission

Section number of the Plan Change	Support /Oppose	Submission	Decision sought
Please refer to title and page numbers used in the plan change document	Indicate whether you support or oppose the provision.	State in summary the nature of your submission and the reasons for it.	State clearly the decision and/or suggested changes you want Council to make on the provision.
Chapter 3.11: Background and Explanation	Oppose	The plan would need to be improved by adding an issue statement to address issues for commercial vegetable sector	Provide opportunity for commercial vegetable sector to produce on new sites in the Waikato River catchment, to ensure adequate productive capacity is retained. This will ensure produce such as leafy greens and potatoes will not be substituted for imported product during key periods of the domestic food chain.
3.11.1: Values and Uses for The Waikato and Waipa Rivers	Support	Support and identification of primary production as a Mana Tangata value of water arising from its use by people for economic, social and cultural purposes.	Retain primary production as a Mana Tangata value.
3.11.2 Objective 2: Social, Economic and cultural wellbeing is maintained in the long term	Support	Maintaining social, economic and cultural wellbeing must be a priority objective in PC1	Retain and proposed.
3.11.2 Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and freshwater management unit	Support	It is agreed that a 10% reduction should be sought overall but targeted reductions required for vegetable growing should be fair and considered.	Amend the plan to provide flexibility to land owners seeking to achieve reductions collaboratively at a catchment scale.
3.11.2 Objective 4: People and community resilience	Support	The proposed plan change cannot and should not allocate discharge rights	Amend the objective to recognise that this plan change is transitional, time is required to develop the tools required to more effectively allocate responsibility for achieving contaminant reduction targets in the long-term.

3.11.3 Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	Support	Support the recognition and enablement of low intensity farming systems.	Retain and proposed.
3.11.3 Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	Support	<p>Supports a policy platform that provides for the following:</p> <ul style="list-style-type: none"> <li>- The essential aspects of the vegetable production industry in the Waikato region.</li> <li>- Targeted reductions required for vegetable growing that are fair given the impact of the sector on water quality and the likely cost to the community of achieving the targets.</li> <li>- Ensure the proposed farm planning framework is practical and achievable for growers.</li> </ul>	Retain policy approach subject to consequential amendments to other policies and methods to give effect to the relief sought.
3.11.3 Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	Support	Support a policy platform that enables existing and new low discharging activities to continue while recognising that low dischargers may in the future need to take mitigation actions to reduce contaminants.	Retain as proposed.
3.11.3 Policy 5: Staged approach	Support	Support staged approach to implementing the Vision and Strategy.	Retain staged approach as proposed.

3.11.3 Policy 6: Restricting land use change	Oppose	Oppose operations capable of demonstrating clear and enduring decreases in existing diffuse discharges should be required to undertake an application for a non-complying activity resource consent. The operations should be provided for as a restricted discretionary activity.	Produce a restricted discretionary activity for operations capable of demonstrating clear and enduring decreases in existing diffuse discharges.
3.11.3 Policy 8: Prioritised implementation	Support	Grower operations do not adequately fit into sub-catchments. Rotations are most likely to vary across sub-catchments on a yearly basis.	Retain as proposed
3.11.3 Policy 9: Sub-catchment (including edge of field) mitigation planning and co-ordination and funding	Oppose	There is no provision in the plan to offset the effects of diffuse discharges by providing mitigations beyond the farm boundary.	Policy should be modified to provide for offsetting where it can be demonstrated there will be a commensurate effect on the restoration of the health and well-being of the Waikato River.
3.11.3 Policy 11: Application of best practicable option and mitigation or offset of effects to point source discharges	Support	Support offsetting policy and methods as a practical tool for mitigating the effects of discharges within a catchment.	Amend the policy and method to extend to non-point source discharges where the same environmental outcomes can be achieved.
3.11.5 Rule 1: Permitted Activity Rule- small and low intensity farming activities	Support	Support recognition and enablement of low intensity farming systems.	Retain as proposed.

<p>3.11.5 Rule 5: Controlled Activity Rule- existing commercial vegetable production</p>	<p>Support</p>	<p>Support rule that provides a controlled activity non-notified consent pathway that recognises and provides for:</p> <ul style="list-style-type: none"> <li>- The essential aspects of the vegetable production industry in the Waikato.</li> <li>- Targeted reductions required for vegetable growing that are fair given the impact of the sector on water quality and the likely cost to the community to achieve these targets.</li> <li>- Ensure the proposed farm planning network is practical and achievable for growers.</li> </ul>	<p>Retain as proposed.</p>
<p>New Restricted Discretionary Activity Rule- The management of contaminants from farming activities by a catchment collective</p>	<p>Support</p>	<p>The plan should enable the collaborative management of discharges at a scale greater than a single farm. Grower/ catchment collectives managing discharges as a single enterprise within a sub catchment or a water management unit are very likely to achieve a sustainable environmental outcome.</p>	<p>Amend plan to provide a new restricted discretionary rule to enable contaminant management by a catchment collective.</p>

<p>3.11.5 Rule 7: Non- Complying Activity Rule- Land Use Change</p>	<p>Oppose</p>	<p>Oppose the non-complying activity status for land use change to commercial vegetable production. The plan should enable opportunities for new vegetable production through a new restricted discretionary rule if the proposed operation can demonstrate a decrease in discharges compared to the activity it is replacing. Those discharges should be assessed across all four contaminants as covered by the plan change.</p>	<p>Add a new restricted discretionary activity rule that enables the use of land for new and additional commercial vegetable production where the effects of the land use change can demonstrate there will be a decrease in the discharges of nitrogen, phosphorus, sediment and microbial pathogens because of the land use change.</p>
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