

FURTHER
SUBMISSION

Further submission

Proposed Change 5 (Kaituna River)

9 November 2021

To: Bay of Plenty Regional Council

Name of Submitter: Horticulture New Zealand

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OVERVIEW

Submission structure

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Our submission

Horticulture New Zealand (HortNZ) made a submission on Proposed Plan Change 5 (Kaituna River) to the Bay of Plenty Regional Policy Statement and welcomes any opportunity to continue to work with Bay of Plenty Regional Council and to discuss our submission.

The details of HortNZ's further submissions and decisions we are seeking from Council are set out below.

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of 6000 commercial fruit and vegetable growers in New Zealand, who grow around 100 different crop types and employ over 60,000 workers.

There is approximately 120,000 hectares of horticultural land in New Zealand - approximately 80,000 ha of this is fruit and vegetables. The remaining 40,000 ha is primarily made up of wine grapes and hops, which HortNZ does not represent.

It is not just the economic benefits associated with horticultural production that are important. The rural economy supports rural communities and rural production defines much of the rural landscape. Food production values provide a platform for long term sustainability of communities, through the provision of food security.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.

Further Submission

1. Horticulture New Zealand's (HortNZ) further submissions are contained in the attached table below.
2. HortNZ represents commercial fruit and vegetable growers in Bay of Plenty 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.

Further submission on behalf of HortNZ on Proposed Plan Change 5

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Western Bay of Plenty District Council	4.3	2.12.4 Issue 2	Support in part	<p>We support splitting out urban and rural land use intensification from climate change.</p> <p>However, we consider the current drafting does not describe the situation accurately, it would be more accurate to say (refer tracked changes):</p> <p><i><u>Projected urban growth and potential horticultural agricultural intensification may place increased demand on water, particularly in the lower Kaituna.</u></i></p>	Accept submission in part – but amend wording with respect to agriculture.
Royal Forest and Bird Protection Society NZ (Forest & Bird)	14.3	2.14 Issue 2	Support	Support the addition of industrial development and demand for municipal water uses as pressures on Kaituna River.	Accept submission.
Tauranga City Council	11.1	Objective 41	Support	Support the rationale for the change proposed.	Accept submission
Forest & Bird		Objective 41	Oppose	The basis for adding 2030 as a timeframe is unclear.	Reject submission.

Bay of Plenty Federated Farmers and Rotorua/Taupo Federated Farmers	13.3	Objective 42	Support	Support including, in addition to mauri and tangata whenua, ecological and recreational values - providing sufficient quantity for productive values.	Accept submission
Forest & Bird		Objective 42	Oppose	The basis for adding 2030 as a timeframe is unclear.	Reject submission.
Eastland Generation Limited	2.8	Objective 43	Support in part	HortNZ consider that a new policy addressing climate change mitigation should also consider the opportunity of land use change (to lower emissions land uses, such as horticulture)	Accept in part.
Bay of Plenty Federated Farmers and Rotorua/Taupo Federated Farmers	13.6	Objective 46	Support	HortNZ support collaboration with primary industry groups	Accept
Tauranga City Council	11.6	Policy KR 2B (and explanation)	Oppose	The wording sought by the submitter seeks to change the wording from "that purpose" to "domestic, marae or municipal water". We prefer the notified wording, because limits should provide for existing uses of drinking water, but	Reject submission.

				in future, consideration should be given to the suitability for the location for drinking water supply. In addition, it is more accurate to describe the use as "drinking water" than "municipal" because municipal supplies are used for broader purposes.	
Tauranga City Council	11.6	Policy KR 2B (and explanation)	Support in part/Oppose in part	The wording sought by the submitter is not certain. We understand that a source water management plan is about the water supplier identifying and managing risk.	The wording sought by the submitter is not certain.
Tauranga City Council	11.8	Policy KR 5B	Oppose	We do not support deleting 'commercial and industrial' activities from the requirement to implement best management activities to minimise nutrient losses. The reference to drinking water is already addressed under Policy KR 2B.	Reject submission
Forest and Bird	14.19	Policy KR 5B	Oppose	Do not support the amendment sought to 'control nutrient inputs ...' as proposed. HortNZ supports the implementation of best management practices through a mix of regulation, industry incentives and industry leadership.	Reject submission

Tauranga City Council	11.14	Definition BMP	Oppose	<p>The submission seeks to include a definition for best management practices (however does not propose a definition).</p> <p>This will differ by sector, what is defined as BMP for an industrial activity for an example would not be the same for the rural industry (and BMP will vary by rural sector). HortNZ supports Freshwater Farm Plans as a means of demonstrating GMP/BMP.</p>	Reject submission.
Western Bay of Plenty District Council	4.20	Objectives, anticipated environmental results and monitoring indicators - Objective 45	Oppose in part	Does not align with the terminology in the proposed plan (Farm environment plan) or Part 9A of the RMA (Freshwater farm plan). This makes it unclear what an 'approved farm management plan is' in this context. It does not clearly link to a method in the plan.	Reject in part.