

Hon David Parker BCom, LLB

Attorney-General

Minister for the Environment

Minister of Transport

Associate Minister of Finance



09/10/2023

COR5416

Cr Daran Ponter, Chair
Greater Wellington

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Dear Daran Ponter

I wrote to regional authorities on 4 April 2023 noting uncertainty as to how plans currently in development under the National Policy Statement for Freshwater Management 2020 (NPS-FM) will enable continuity for vegetable growing and expansion of the domestic supply in line with future growth of New Zealand's population.

I made a request under section 27 of the Resource Management Act 1991 for information on how regional and unitary councils intend to provide for vegetable production through NPS-FM planning instruments (land and water plans). In particular, I asked for details about any mechanisms councils are developing that enable vegetable growers to practice crop rotation, and expansion of the total area of production.

Replies were to be received in confidence, and not shared beyond the joint agency (Ministry for Primary Industries and Ministry for the Environment) project team, subject to statutory requirement. You will be aware that we received a request under the Official Information Act 1982 for copies of the reports. Given that the letters have circulated beyond the project team, I have attached a brief analysis provided by my officials at the Ministry for the Environment, and a summary of the council responses for your information.

Your full and considered response was appreciated. It will be useful to your regional authority colleagues, and for the development of national direction. The first reports were naturally limited by the early stage of development of council land and water plans. I expect the second reports (due by 19 May 2024) to give more clarity about Council approaches to the significant issue of maintaining supply of fresh vegetables.

I note your report raised requests for further national direction to provide for vegetable production beyond the SVGAs, and you would welcome national guidance on how regional authorities might balance competing objectives in national policy statement direction to provide more effectively for vegetable production. New national direction cannot be produced in time to affect plans that must be notified by December 2024. However, a number of councils have asked for further engagement and/or guidance on providing for vegetable production, and this is something I have asked officials to work toward.

You are probably aware that since the reports were received, a requirement for national direction on enabling supply of fresh fruit and vegetables was inserted into the Natural and Built Environment Act 2023. The direction is required to be in a notified national planning framework proposal before 1 January 2028.

Thank you again for the information you provided. The responses give an emerging picture of the issues involved in planning for vegetable production. I am pleased to see councils turning their attention to the important issue of ensuring domestic supply of fresh vegetables.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'David Parker', with a stylized flourish at the end.

Hon David Parker
Minister for the Environment

CC. Nigel Corry, Chief Executive, nigel.corry@gw.govt.nz

Encl.

Summary of council intentions to provide for vegetable production in land and water plans

The following information provides a brief analysis and summary of regional authority responses to a request by the Minister for the Environment under section 27 of the Resource Management Act 1991. The request was for information on how regional and unitary councils intend to provide for vegetable production through NPS-FM planning instruments (land and water plans). In particular, the request asked for details about any mechanisms councils are developing that enable vegetable growers to practice crop rotation, and expansion of the total area of production.

Common themes

Three common themes emerged from council responses.

- Most councils cannot have firm intentions about the contents of plans at this stage, as the approach to vegetable growing will derive from the plan development processes. Engagement with communities and tangata whenua is ongoing. Future scheduled reports will be able to be more forthcoming.
- The National Policy Statement for Freshwater Management 2020 (NPS-FM) constrains expansion in that Target Attribute States (TAS) cannot be set below current states/National Bottom Lines (NBL). Councils note it is difficult to provide for any expansion of vegetable growing within the constraints of the NPS-FM. Expansion of vegetable production would first require creating headroom in the total catchment load from reductions in other sectors before increased horticulture discharges could be contemplated. At this stage, no councils appear to be contemplating planned reallocation of resources/discharges from other sectors to the domestic vegetable production sector.
- The hierarchy expressed in Te Mana o Te Wai (TMoTW) constrains expansion of vegetable production where it would increase adverse impacts on water quality. Most councils reported on the issue of vegetable production in terms of its impacts on water quality, rather than its value for domestic food supply. Several councils responded that vegetable production is/will be specified in the values and outcomes of regional policy statements (RPS) and in land and water plans, but enabling provisions for vegetable production are usually subject to water quality and quantity objectives.

Two councils noted the importance of setting adequate timeframes for reaching interim targets and ultimately the TAS, as the key NPS-FM mechanism for reconciling vegetable production and its associated water quality impacts. Appropriate timeframes will allow for grower adaptation and innovation to significantly reduce contaminant discharges, while maintaining production of food in the short and medium-term.

Summary of responses

Intentions to make specific provision for vegetable production

Auckland Council (Auckland) and Waikato Regional Council (Waikato) indicated they intend to make specific provision for vegetable production in their land and water plans (or do so at present).

Manawatū-Whanganui Regional Council (Horizons), Wellington Regional Council (Greater Wellington), Tasman District Council (Tasman), and Nelson City Council (Nelson) indicated they may make specific provision for vegetable production, depending on the outcomes of their plan making processes. Tasman includes the following in its draft vision for the Waimea FMU, “The Waimea plains continue to play an important role in food production and food security for our communities and New Zealand.”

The remaining councils either do not plan to make specific provision for vegetable production or did not report on this aspect.

Table 1 summarises council intentions to specifically address vegetable production in land and water plans.

Intentions to provide for expanded vegetable production

The Canterbury Land and Water Regional Plan (Canterbury) provides a consenting pathway for expansion provided nitrogen losses do not exceed the limits for the new area. The provisions are operative.

Greater Wellington specifically provides for expanded vegetable production in its current proposed plan change, although this is under appeal.

The remaining councils reported:

- being too early in their planning processes to respond on this point
- feeling constrained on this issue by NPS-FM requirements to maintain or improve water quality, and that TAS not be set below baseline attribute states. For example, among other options, Bay of Plenty Regional Council (Bay of Plenty) is considering an intensification constraint equivalent to that in the current National Environmental Standard for Freshwater (NES-F), which would apply to proposals for large areas of new production.
- plans to enable expansion of vegetable production through general or non-specific provisions (eg, prioritising primary production land uses on highly productive land, or enabling expansion of vegetable production where it can comply with water quality limits).

Table 2 summarises council intentions to provide for expanded vegetable production in land and water plans.

Intentions to provide for crop rotation

Canterbury’s operative plan provisions enable growers to move production between locations while managing impacts on freshwater. Waikato and Horizons specifically provide for/support vegetable crop rotation in their current proposed plan changes. Both plan changes are under appeal.

Marlborough District Council (Marlborough) plan provisions currently address crop rotation to a limited extent, for the purposes of water allocation (irrigation) and not specifically in relation to vegetable crops. Otago Regional Council's (Otago) plan provisions could enable vegetable crop rotation to occur within the constraints of TMoTW priorities, and where the activity complies with limits, restrictions or requirements to manage potential adverse effects on water quality. Taranaki Regional Council (Taranaki) is considering the role of global consents and management plans as a way to manage and provide for the practice of crop rotation.

The remaining councils either do not specifically provide for vegetable crop rotation, have not considered it to date, or do not report on this issue.

Table 3 summarises council intentions to specifically provide for vegetable crop rotation in land and water plans.

Additional points - the Specified Vegetable Growing Areas provisions

The Pukekohe Special Vegetable Growing Areas (SVGA) extends across Auckland and Waikato regional boundaries. The Horowhenua SVGA falls in the Manawatū-Whanganui region.

Auckland's intention is to apply the SVGA provisions to set some TAS below the NBL for the 10-year period following plan change notification. Auckland is also looking to develop a more nuanced approach to meeting NBL across the SVGA over a longer timeframe such as 60 to 80 years, using interim targets of up to 10 years as provided for in clause 3.11(6) of the NPS-FM.

Waikato states that the application of clause 3.33 (and potential cross-boundary issues) are being addressed as part of their freshwater policy review. Te Ture Whaimana o Te Awa o Waikato (the vision and strategy for the Waikato and Waipa Rivers) also applies, prevailing where there are inconsistencies between the NPS-FM, the vision and strategy.

Waikato also reports that vegetable growers are likely to request a sector specific conversation in upcoming engagement planned to address TAS and may seek further SVGA provisions in the region.

Horizons is too early in its freshwater planning process to be able to report on whether it intends to utilise clause 3.33. Horizons is currently gathering the evidence needed to determine whether the pre-conditions in apply in the Horowhenua SVGA.

Tasman suggests the Waimea Plains be defined as an SVGA in the NPS-FM, in recognition of its importance to regional and national food production, and food supply in the region.

Additional points - council requests for action or information

Auckland seeks the NPS-FM regime to be updated to reflect a more systems-orientated approach. This would recognise there are multiple policy outcomes and drivers, various instruments and tools including multiple relevant national policy statements, other land uses (and contaminants) relevant to the broader FMU and constituent catchments.

Specifically, Auckland suggests the SVGA provisions be extended beyond 2030 so that staged approaches can be reflected in plans beyond 2024. It also supports further qualifying the SVGA provisions to support setting long-term TAS over 60 to 80 years in combination with shorter interim TAS goals (potentially below NBL).

Waikato asked about current plans to provide further SVGA in the region and on 30 June 2023 the Minister for the Environment advised there were no current plans.

Hawke's Bay Regional Council (Hawke's Bay) sought additional time for NPS-FM implementation. This has been addressed through Cabinet's Extreme Weather Recovery response.

Greater Wellington commented that there is no specific national direction to provide for vegetable production beyond the SVGAs and would welcome national guidance on how regional authorities might balance competing objectives in national policy statement direction to provide more effectively for vegetable production.

Tasman is interested in practical outputs from national level conversations relating to the role of council land/water resource management in advancing the provision of national food production and food security. It also seeks inclusion of the Waimea Plains as an SVGA and would benefit from more national guidance and national science support on implementation of the NPS-FM, TMoTW and the National Objectives Framework (NOF) to groundwater.

Gisborne District Council notes a need for central government support to re-mobilise their aerial 'SkyTEM' groundwater mapping in the key vegetable growing area of Poverty Bay Flats. The work was delayed due to the impacts of Cyclone Gabrielle.

Table 1: intentions to provide specifically for vegetable production (VP) in land and water plans

<i>Council</i>	<i>Key instruments</i>	<i>Intentions to provide specifically for VP in regional land and water plans</i>
Northland RC	Freshwater Plan change (FPC) to Northland RPS and Proposed Regional Plan. <i>In development</i>	No. Providing for specific land uses such as VP will be a secondary consideration in accordance with TMOTW hierarchy of priorities set out in the NPS-FM.
Auckland Council	Auckland Unitary Plan change (AUP) <i>In development</i>	Yes. Auckland Council reports they intend to utilise the SVGA provisions. Auckland Council is also considering options to specifically address water quality impacts from VP.
Waikato RC	Proposed Waikato Regional Plan Change 1 – Waikato-Waipā (PC1): <i>under appeal</i> Freshwater Policy Review (FPR) <i>In development</i>	Yes. PC1 (under appeal) makes considerable, specific provision for VP expansion and crop rotation. The FPR will address limits for diffuse discharges from farming activities and the application (or not) of NPS-FM cl. 3.33.
Bay of Plenty RC	Regional Natural Resources Plan (RNRP) <i>operative</i> Regional plan change <i>In development</i>	No. No plans to provide specifically for VP yet. A Regional Plan review is underway but early in the process. Freshwater management options include water quantity limits and restrictions, input limits, minimum performance standards. Farm plan requirements for less than 5 hectare VP are not being considered, however consideration is being given to an intensification constraint similar to the temporary regulation in the NES-F.
Taranaki RC	Regional Freshwater Plan for Taranaki (RFP)	No. No plans to provide specifically for VP yet. Freshwater plan provisions will be updated to implement NPS-FM. The current work programme

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Council	Key instruments	Intentions to provide specifically for VP in regional land and water plans
	<p><i>operative</i></p> <p>RFP change</p> <p><i>In development</i></p>	<p>is largely focussed on setting baselines, attributes and target attribute states. Policy development and industry-specific approaches are too early to determine.</p> <p>VP is not currently significant in Taranaki. There is interest and suitability for VP, but it is not presenting as an immediate pressure, and a number of constraints will need to be investigated further before it becomes a more dominant industry.</p>
Gisborne DC	<p>Tairāwhiti Resource Management Plan (TRMP)</p> <p><i>operative</i></p> <p>Regional Freshwater Plan (RFP) and</p> <p>Waipāoa Catchment Plan (WCP)</p> <p><i>Under review</i></p>	<p>To be determined.</p> <p>The WCP recognises irrigation and food production as an important value to maintain.</p> <p>RFP and WCP reviews, and the water security and resilience programme, intend to furnish solutions to supporting vegetable production in the region while ensuring Te Mana o te Wai obligations are met, however Council will need to take a more stringent approach to water allocation and nutrient management on the Poverty Bay Flats, a key vegetable growing area.</p>
Hawkes Bay RC	<p>Regional Resource Management Plan Proposed plan change 9 (PC9)</p> <p><i>under appeal</i></p> <p>Regional Resilience Plan (RRP)</p> <p><i>(First edition in place until Mid-August 2023)</i></p>	<p>No.</p> <p>PC9 will include objectives for how to manage water quality/quantity for Tūtaekurī, Ahuriri, Ngaruroro, and Karamū (TANK) catchments, targeting efficient and effective consenting and planning processes. No specific intentions to provide for VP.</p> <p>First edition of RRP outlines immediate recovery actions until mid-August 2023 including for example flood protection infrastructure repair work, an assessment of the effectiveness of existing erosion control measures; and help to landowners with immediate recovery. It contains no new rules. A second version is being prepared for publication in September targeting longer term recovery work. The RRP will address</p>

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<i>Council</i>	<i>Key instruments</i>	<i>Intentions to provide specifically for VP in regional land and water plans</i>
		national direction requirements, eg, the protection of highly productive soils from inappropriate use and subdivision while also considering water quantity and quality.
Horizons Manawatu-Whanganui RC	The One Plan <i>operative</i> Plan Change 2 (PC2) <i>under appeal</i>	To be determined. PC2 addresses consenting/nutrient management of VP. Freshwater planning provisions will depend on the needs for improved water quality and whether cl.3.33 (the SVGA provision) applies. Any provision would be through a plan change based on the outcomes of a s.32 cost/benefit assessment. Engagement so far has emphasised the importance of both restoring the waterbodies and ensuring continued access to healthy food options.
Greater Wellington Wellington RC	Proposed Natural Resources Plan (NRP) . <i>operative</i> Whaitua Implementation Plans (WIPs) <i>in development</i>	To be determined. NRP addresses the discharge of contaminants to land. Does not provide specifically for soil used for VP. It is too early to say how VP will be enabled. Decisions will be guided by mana whenua, partnerships and will be subject to a public hearings process. WIPs will eventually comprise chapters in the NRP. None have identified provisions for VP to date.
Marlborough DC	Freshwater provisions for a proposed variation to the Marlborough Plan (PMEP) <i>in development</i>	No. Very few vegetables are grown in Marlborough. The trend of conversion to grape production continues. Sector groups identify food production as a freshwater value (ie for irrigation and some processing)
Tasman DC	New land and freshwater plan (LFP)	To be determined. Too early to report on specific approaches in this early stage of the LFP. However, the draft vision

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Council	Key instruments	Intentions to provide specifically for VP in regional land and water plans
	<p><i>in development</i></p> <p>nb. whole-of-plan review is delayed due to RM reform direction on combining plans with Nelson.</p>	<p>for the Waimea FMU includes "...The Waimea plains continue to play an important role in food production and food security for our communities and New Zealand".</p> <p>Tasman does not consider VP will be able to continue to operate under regional plans that implement the NPS-FM without significant change to current land, water, and crop management practices, particularly in areas with existing deterioration of nitrate in groundwater.</p> <p>Tasman seeks review of SVGA to include other food types, locations, and timeframes, and seeks SVGA for the Waimea Plains in the interim.</p>
Nelson CC	Working with Tasman DC on a land and freshwater plan (LFP)	<p>No.</p> <p>Nelson does not have VP at a commercial scale.</p>
West Coast RC	<i>N/A</i>	<i>Not reported</i>
Environment Canterbury	<p>Canterbury Land and Water Regional Plan, via Plan Change 7</p> <p>(PC7)</p> <p><i>Operative</i></p>	<p>Yes.</p> <p>PC7 policy recognises the importance of commercial VP for domestic food supply and the need to rotate crops and /or shift location to avoid soil-borne diseases.</p> <p>VP is permitted on less than 5ha.</p> <p>A Restricted Discretionary/Discretionary consent pathway exists for VP over larger areas, crop rotation and expansion, requiring Farm Environment Plans as part of consent applications, and implementation of good management practices.</p> <p>Council has discretion to consider impacts on catchment nutrient loads and limits from shifting production between sub-regions.</p> <p>PC7 allows alternatives to OVERSEER® for modelling and demonstrating compliance with nitrogen loss limits.</p>

Table 1: intentions to provide specifically for vegetable production (VP) in land and water plans

<i>Council</i>	<i>Key instruments</i>	<i>Intentions to provide specifically for VP in regional land and water plans</i>
Otago RC	<p>RPS (primary instrument for protecting HPL)</p> <p>proposed Land and Water regional Plan (pLWRP) <i>in development</i></p>	<p>No.</p> <p>Vegetable growing area is small compared with other land uses. It is too early to report on VP provisions as the draft pLWRP is still being developed.</p> <p>RPS provisions will protect existing VP operations and will allow expansion through strong policy direction for the protection of soil health and safeguarding highly productive land, and pLWRP will recognise vegetable production as an economic value through environmental outcomes.</p>
Southland RC	<p>Plan Change Tuatahi (PCT) <i>in development</i></p>	<p>No.</p> <p>VP in the region is not a significant contributor to domestic vegetable supply; nor a notable land in Southland, and not expected to be in the foreseeable future.</p>

Table 2: plans to provide for expanded vegetable production (VP)

<i>Council</i>	<i>Key instruments</i>	<i>Plans to develop mechanisms to enable expansion of the total area of production</i>
Northland RC	<p>Freshwater Plan change (FPC) to Northland RPS and Proposed Regional Plan. <i>in development</i></p>	<p>No.</p> <p>The degree to which the FPC will enable expansion of vegetable production will depend on VP ability to operate within water quality and quantity limits.</p>
Auckland Council	<p>Auckland Unitary Plan change (AUP)</p> <p>Future Development Strategy FDS (informed by NPS-HPL) <i>In development</i></p>	<p>No.</p> <p>AUP zoning provisions (Rural Urban Boundary zoning, Countryside Living zoning) direct suitable land uses in/away from rural land. Auckland Council is reassessing the FDS, (informed by the NPS-Highly Productive Land). There is the potential for areas currently identified as future urban to be rezoned as appropriate rural zones, by a plan change.</p>

Table 2: plans to provide for expanded vegetable production (VP)

Council	Key instruments	Plans to develop mechanisms to enable expansion of the total area of production
Waikato RC	<p>Proposed Waikato Regional Plan Change 1 – Waikato-Waipā (PC1): <i>under appeal</i></p> <p>Freshwater Policy Review (FPR) <i>In development</i></p>	<p>Yes.</p> <p>PC1 policy 3 provides for limited expansion of VP into 13 sub-catchments selected on the basis that:</p> <ul style="list-style-type: none"> -there is suitable land (eg, LUC 1 or 2 rural zoned land), - the sub-catchment is above the NOF 'C band' for nitrate, and - they don't drain to sensitive wetland/lake environments. <p>VP expansion will require a discretionary consent, and is subject to area limits to existing and new VP, as well as farm environment plans, contaminant mitigation measures, contaminant off-setting, and compensation.</p> <p>Nb. Appellants to PC1 are variously seeking to remove /increase the ability to expand VP.</p>
Bay of Plenty RC	<p>Regional Natural Resources Plan (RNRP) <i>operative</i></p> <p>Regional plan change <i>In development</i></p>	<p>No.</p> <p>VP is not a significant land use in the Bay of Plenty now or in the foreseeable future.</p> <p>Aside from any new environmental regulation, new VP of any substantial scale would compete with other high value land uses (eg kiwifruit and avocado) for suitable land access.</p> <p>Consideration is being given to an intensification constraint similar to the temporary regulation in the NES-F.</p>
Taranaki RC	<p>Regional Freshwater Plan for Taranaki (RFP) <i>operative</i></p> <p>RFP change <i>In development</i></p>	<p>No.</p> <p>Taranaki is working with key stakeholders looking to promote VP, however there are no specific plans to enable VP expansion yet given early stage of policy development.</p> <p>Guiding consideration is to manage impacts on water quality and quantity. Land uses can be enabled provided they occur within limits on resource use, environmental flows and take limits.</p>
Gisborne DC	<p>Tairāwhiti Resource Management Plan (TRMP)</p>	<p>No.</p> <p>No specific plans to enable expansion to date.</p>

Table 2: plans to provide for expanded vegetable production (VP)

Council	Key instruments	Plans to develop mechanisms to enable expansion of the total area of production
	<p><i>operative</i></p> <p>Regional Freshwater Plan (RFP) and</p> <p>Waipaoa Catchment Plan (WCP)</p> <p><i>Under review</i></p>	<p>To give effect to the new NPS-FM 2020, Council is considering a more stringent approach to water allocation and nutrient management on the Poverty Bay Flats, a key vegetable growing area.</p>
Hawkes Bay RC	<i>N/A</i>	<i>Not reported</i>
Horizons Manawatu-Whanganui RC	<p>The One Plan <i>operative</i></p> <p>Plan Change 2 (PC2) <i>under appeal</i></p>	<p>No.</p> <p>No specific plans to enable expansion, as expansion will increase N-related discharges, constrained by the NPS-FM. Expansion would therefore first require creating headroom in the total catchment load from reductions in other sectors before increased horticulture discharges could be contemplated.</p>
Greater Wellington Wellington RC	<p>Proposed Natural Resources Plan (NRP).</p> <p>Whaitua Implementation Plans (WIPs) <i>in development</i></p>	<p>No.</p> <p>Would appreciate national guidance on how councils can balance competing national direction objectives. This would help RCs to provide more effectively for VP.</p>
Marlborough DC	<p>Freshwater provisions for a proposed variation to the Marlborough Plan (PMEP)</p> <p><i>in development</i></p>	<p>No.</p> <p>Not anticipating or planning for an expansion in the area of vegetable production.</p>
Tasman DC	<p>new land and freshwater plan (LFP)</p> <p><i>in development</i></p>	<p>No.</p> <p>The NPS-FM does not readily allow for expanded vegetable production under where water is already degraded, or where it may lead to further</p>

Table 2: plans to provide for expanded vegetable production (VP)

Council	Key instruments	Plans to develop mechanisms to enable expansion of the total area of production
	nb. 'whole-of-plan' review is delayed due to RM reform direction on combining plans with Nelson.	water quality deterioration.
Nelson CC	Working with Tasman DC on a land and freshwater plan (LFP)	See Tasman DC.
West Coast RC	<i>N/A</i>	<i>Not reported</i>
Environment Canterbury	Canterbury Land and Water Regional Plan, via Plan Change 7 (PC7) <i>Operative</i>	Yes. PC7 provides a Discretionary consent pathway for VP expansion, requiring a Farm Environment Plan and provided nitrogen losses do not exceed the limits for the new area. VP is a non-complying activity otherwise.
Otago RC	RPS (primary instrument for protecting HPL). proposed Land and Water regional Plan (pLWRP) <i>in development</i>	No. Future growth of the sector does not appear to be limited by a lack of LUC classes 1-3 land. However it is appropriate for the pLWRP to take a proactive approach to managing activities/practices associated with VP. RPS provisions will enable VP expansion through strong policy direction for the protection of soil health and safeguarding highly productive land. The pLWRP will recognise vegetable production as an economic value through environmental outcomes, and will enable VP to expand subject to TMOTW priorities (health of freshwater bodies, health and well-being needs of people), and if unlikely to cause further over-allocated or degradation.

Table 2: plans to provide for expanded vegetable production (VP)

<i>Council</i>	<i>Key instruments</i>	<i>Plans to develop mechanisms to enable expansion of the total area of production</i>
Southland RC	Plan Change Tuatahi (PCT) <i>in development</i>	No. Vege growing has decreased in area over past 20 years. Expansion of total areas of production would probably increase nutrient losses and would therefore need to be incorporated into the consideration of catchment-specific limit-setting.

Table 3: plans to accommodate vegetable crop rotation

<i>Council</i>	<i>Key instruments</i>	<i>Plans to develop mechanisms to enable crop rotation</i>
Northland RC	N/A	<i>Not reported</i>
Auckland Council	Auckland Unitary Plan change (AUP) <i>In development</i>	No. No specific provisions for crop rotation at present. Any approach (to protecting lands with elite and prime soils for vegetable production) requiring an allocation of nutrients at a land parcel level could have an impact on growers' ability to move production from one property to another.
Waikato RC	Proposed Waikato Regional Plan Change 1 – Waikato-Waipā (PC1): <i>under appeal</i> Freshwater Policy Review (FPR) <i>In development</i>	Yes. PC1 policy 3 provides for VP crop rotation to changing/multiple properties. The provisions are under appeal to the effect that they don't provide appropriately.
Bay of Plenty RC	Regional Natural Resources Plan (RNRP) <i>operative</i> Regional plan change <i>In development</i>	No. Not considered to date, but can be.

Table 3: plans to accommodate vegetable crop rotation

Council	Key instruments	Plans to develop mechanisms to enable crop rotation
Taranaki RC	Regional Freshwater Plan for Taranaki (RFP) <i>operative</i> RFP change <i>In development</i>	No. No specific plans to enable crop rotation yet given early stage of policy development. Taranaki is working with key stakeholders looking to promote VP and is considering the potential for global consents and management plans (currently applied to other industries), as a way of managing and providing for crop rotation and moving production and associated discharges from one property to another.
Gisborne DC	Tairāwhiti Resource Management Plan (TRMP) <i>operative</i> Regional Freshwater Plan (RFP) and Waipāoa Catchment Plan (WCP) <i>Under review</i>	No. No specific plans to enable crop rotation to date.
Hawkes Bay RC	<i>N/A</i>	<i>Not reported</i>
Horizons Manawatu-Whanganui RC	The One Plan <i>operative</i> Plan Change 2 (PC2) <i>under appeal</i>	To be determined. There is no specific work on enabling crop rotation currently. Revision of the current rule framework is planned for the second half of 2023. Note PC2 (under appeal) contains provisions to support crop rotation.
Greater Wellington Wellington RC	<i>N/A</i>	<i>not reported</i>
Marlborough DC	Freshwater provisions for a proposed variation to the	No. Present provisions address crop rotation / switching crops between seasons on the same property, but only in terms of water allocation

Table 3: plans to accommodate vegetable crop rotation

Council	Key instruments	Plans to develop mechanisms to enable crop rotation
	Marlborough Plan (PMEP) <i>in development</i>	(irrigation). The plan is agnostic as to the crop involved.
Tasman DC	<i>N/A</i>	<i>Not reported</i>
Nelson CC	<i>N/A</i>	<i>See Tasman</i>
West Coast RC	<i>N/A</i>	<i>Not reported</i>
Environment Canterbury	Canterbury Land and Water Regional Plan, via Plan Change 7 (PC7) <i>Operative</i>	Yes. PC7 provides a Discretionary consent pathway for crop rotation / production to move location (using a baseline area calculation), requiring a Farm Environment plan on application. Discretions relate to water quality protection, and the total regional VP area among other matters.
Otago RC	RPS (primary instrument for protecting HPL) proposed Land and Water regional Plan (pLWRP) <i>in development</i>	To be determined. The pLWRP will enable VP crop rotation to occur and expand subject to TMOTW priorities (health of freshwater bodies, health and well-being needs of people), and if unlikely to cause further over-allocated or degradation. The pLWRP and RPS won't prevent VP crop rotation, but will include limits, restrictions, or requirements for VP to manage potential adverse effects on freshwater, ie, crop rotation would be enabled through a range of environmental outcomes, subject to the TMOTW hierarchy.
Southland RC	RPS Water and Land Plan Plan Change Tuatahi (PCT) <i>In development.</i>	No. No specific consideration for enabling VP crop rotation to date, although this could be considered in the future as part of Council's planning and implementation processes.