

**IN THE MATTER**

of the Resource Management Act 1991

**AND**

**IN THE MATTER**

of hearings on the Proposed One Plan

**Submission from:**

Horticulture New Zealand

**To:**

Horizons Regional Council

**Date:**

3 July 2008

**1. Introduction**

- 1.1 Madame Chair, Councillor White and Commissioner van Voorthuysen. Thank you for your time and the opportunity to present this evidence to you this afternoon.
- 1.2 I am Chris Keenan, Manager- Resource Management and Environment with Horticulture New Zealand. Prior to this role I was a Senior Adviser in the Sustainable Water Programme of Action at the Ministry for the Environment. Prior to the Ministry for the Environment I worked for Greater Wellington and Auckland Regional Councils in a variety of roles including enforcement, consent compliance and environmental research including coastal and freshwater research. I hold conjoint Bachelor of Resource studies and Bachelor of Science Degrees from Lincoln University. I've been working in the resource management and environment field since I graduated in 2000 for eight years.
- 1.3 With me is Lynette Wharfe, a consultant from The Agribusiness Group who will provide assistance and has been involved in the preparation of this evidence. Lynette has had well over ten years of experience in planning matters pertinent to the horticulture industry.
- 1.4 It's usual for us also to bring growers to hearings. In this case we have not, but we plan to involve growers in the hearings at stages where the plan topics are of particular relevance to them.

**2. Horticulture New Zealand's involvement in the Proposed One Plan**

Horticulture New Zealand represents the interests of 7000 commercial vegetable and fruit growers throughout New Zealand, including many located in the Horizons region.

Horticulture NZ made substantial submissions and further submissions on the One Plan because of the importance of the region for horticultural production. We had been involved in early consultation with the development of the Plan but were not included in the latter stages when the Proposed One Plan was coming into being.

Parts of the approach in the Proposed One Plan have the ability to severely curtail some horticultural activities in the region. The horticultural sector is under considerable regulatory, and subsequent economic pressures throughout the country. If I can just make the point, regional and territorial authority compliance programmes are part of the

compliance regime we face. The compliance demands of the main customers for horticulture are just as impossible to avoid.

3. Some additional source of compliance & regulation include biosecurity controls, employment law, occupational health and safety, territorial authority land use controls and building code restrictions. Horticulture New Zealand is not saying these matters are deserving of compliance requirements. But the lack of coordination and planning between these compliance systems growers are faced with on a daily basis, is a real and growing problem.

During these hearings we will endeavour to elaborate on the extent of such impediments and present alternative solutions that provide a way forward to address the issues that Council is seeking to address. We are pleased that the proposed One Plan Structure provides some mechanisms for potentially reduce the compliance burdens of growers, and we are pleased that council officers have been working with Horticulture New Zealand and growers in the Horowhenua, Ruapehu and Rangitikei regions in prehearing meetings. These meetings were convened to try and find some solutions to the more intractable problems raised for growers by the proposed One Plan.

To set a context for the forthcoming hearings we would like to provide in this evidence some background to Horticulture New Zealand and horticultural operations in the Horizons region, as well as key messages that will recur throughout the evidence we will present before the hearings panels in the coming months, followed by evidence on specific submissions addressed in the Overall Plan Officer Report.

### 3. **Background to Horticulture NZ**

Horticulture New Zealand was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers' and New Zealand Fruitgrowers' and New Zealand Berryfruit Growers Federations, and now also includes Olives New Zealand.

Horticulture NZ manages issues that cover and affect the whole horticulture industry, on behalf of all its grower members. Horticulture NZ is currently active in about twenty plan processes throughout the country, from initial submissions through to appeals before the Environment Court. Many of the issues are common between plans, so Horticulture NZ also provides input to policy at the national level focussing currently on matters such as water management, biosecurity, seasonal labour, climate change, hazardous substance management, energy policy, waste management and other resource management issues.

Affiliated to Horticulture NZ there are some 20 product groups that represent and address product specific issues: e.g. Process vegetables, Potato, Tomato, Fresh Vegetables, Export Squash, Asparagus, Pipfruit, Kiwifruit, Avocados and Summerfruit.

There are also the district grower associations that represent growers at a local level and with whom Horticulture NZ works in conjunction on resource management issues.

The district associations in the Horizons Region are: the Horowhenua Fruitgrowers Association, Horowhenua District Growers Incorporated, Manawatu Potato & Opiki Growers Assn Incorporated, The Ohakune Growers Association, The Otaki District

Commercial Gardeners Society Incorporated, The Rangitikei Potato Growers Association, and the Wanganui Vegetable & Produce Growers Association Incorporated.

During the course of the hearings on the One Plan Horticulture NZ will have representatives from some of these associations attending hearings where matters of particular relevance are discussed. Individual growers are also providing submissions in many cases.

### **3. Horticulture in Manawatu - Wanganui Region**

Horticulture is, and has been for many years, a significant contributor to the Manawatu - Wanganui economy. There are approximately 5000 hectares of horticultural production in the region. The commercial horticulture enterprises range from small family business to quite large scale growing operations that can use a wide variety of production systems, both outdoor and indoor.

The range of horticultural activities in the Manawatu- Wanganui Region reflects the diversity of the sector:

- Commercial vegetable growers, many in Horowhenua, Ohakune, Palmerston North, Rangitikei, Opiki and Wanganui. Key produce includes:
  - Yams in Rangitikei
  - Potato and onion growers in Opiki, Ohakune, Rangitikei and Horowhenua
  - Carrots, parsnips, brussel spouts and swedes in Ohakune
  - Kabocha in Lower Manawatu, Rangitikei and Tararua
  - Fresh vegetables - such as brassicas, leafy vegetables, Brussels sprouts and salad vegetables throughout the region – but predominantly in Horowhenua and Palmerston North
  - Asparagus growers in Wanganui, Palmerston North, Bulls, Mangaweka, Levin, Feilding
- Fruit and berry growers in Levin, Wanganui, Mangaweka, and Ohakune
- Process vegetable growers in Tararua
- Olives throughout the region
- Seed potatoes in Lower Manawatu and Rangitikei.

The range of crops and areas within the region mean it is not possible to treat all horticultural businesses within the same framework because of the range of systems, operations and growing conditions.

Within these groupings there are significant variations in size of properties and scale of operations and also different operational systems because of the range of soil and climatic factors. The existence of the traditional 'market garden' growing a wide range of crops has in some places been exchanged for commercial vegetable growing businesses growing only two or three crops, often with operations in many areas throughout NZ to ensure full retail supply is achieved throughout the year.

While vegetable growers own land they also lease considerable areas so that they can achieve suitable rotations for their particular crops. There is also an emerging trend amongst some growers to swap land for crop rotation purposes. Rotation is critical to the sustainability of horticulture, for reasons like maintenance of good soil health and to

suppress soil borne diseases. This means that the areas being cropped can vary considerably between seasons.

There is a small amount of fruit grown in the region, mainly pears, kiwifruit and stone fruit, as well as some avocado and berry operations.

There is a range of ethnicities amongst the growers in the region, in particular asian cultures. Some are recent migrants. Others have been here for a number of generations. These communities add to the cultural diversity and economic success of the region considerably, and are part of the fabric of the horizons region. This cultural diversity can create particular challenges and provide new opportunities. Some of the challenges include consideration of communication and extension activities with growers where English is not the primary language.

Given this diversity growers cannot be treated as a homogenous group. If I can make the point, part of the overall proposed One Plan philosophy includes that it be "*written in plain English where possible*". Horticulture New Zealand would hope that once the final plan is published at least, that materials are provided for growers on relevant topics, in languages that meet some of the growers needs. Horticulture New Zealand would be happy to provide assistance with this.

The economic and social benefits to the region from horticulture are significant. The value of the horticulture industry in the region is in the order of \$40 million in Ohakune and at least \$25 million in Horowhenua. A value for Rangitikei/ Opiki is more difficult because commercial vegetable production is very much part of the mixed farming operations in those districts. Potatoes, with an annual production volume of approx 50,000 tonnes, (including approximately 2,000 tonnes of seed potatoes in Norsewood), is just one example of the significance of particular crops to the region. Carrots in Ohakune are another example.

#### **4. Future of Horticulture in the Manawatu – Wanganui Region**

The climate, soils and availability of water are all factors which contribute to the continued use of land in the Manawatu – Wanganui Region for horticultural activities.

Some growers and sections of the industry have come under pressure in recent years with the closure of the McCains processing plant in Feilding, leading to a shift in the areas where process crops are grown and also requiring those growers to change or diversify crops grown. Many of these growers, including some who traditionally were potato growers in Opiki are now growing feed crops for the dairy industry.

For growers there are some key issues and requirements to enable horticulture to be undertaken sustainably and economically. These include:

- Access to water for irrigation
- Access to water for washing and packing operations
- Ability to apply fertilisers and agrichemicals
- Ability to cultivate soil and harvest crops
- Access to a relevant workforce
- Access to road transport and the established distribution and supply chain

#### **5. Major Horticulture Contributing Research Projects**

Through commodity levy, FORST and SFF funding Horticulture New Zealand, along with several of its vegetable and fruit product groups, undertakes a range of research projects. A number of these are relevant to the approach in the Proposed One Plan.

One such project is *Nitrogen Managers for Environmental Accountability (NMEA)*.

The objective of this 3-year MAF SFF project is to develop a system that will provide accountability with regard to nitrogen inputs and resulting nitrate leaching losses across a wide range of production scenarios within the arable and horticulture industries. This system will be underpinned by a technically robust tool designed to provide for the needs of both growers and regional councils. We are referring to this tool as 'Overseer Hort' as it is similar in nature to that tool that has been designed for pastoral farming activities.

The end result will be a system that allows growers to demonstrate responsible use of nitrogen inputs and thereby satisfy Regional Councils that activities are consistent with the requirements of Regional Plans. The long-list of stakeholders includes most of the Regional Councils, the arable industry, the wine industry and several of HortNZ's fruit and vegetable product groups. Key research providers are Crop & Food Research, HortResearch and AgResearch. Horizons Regional Council has contributed financial support to the project and we are hoping to have some more hands on involvement from now on. The tool is programmed to be operational in February 2009.

## **6. Horticulture New Zealand commitments**

Horticulture NZ has been involved at all levels of the Sustainable Water Programme of Action, government's flagship programme to address the management of freshwater resources. The Primary Sector Reference Group for the Water Programme of Action recently released commitments from the various sectors for targets in respect of water management. As part of this, Horticulture New Zealand has undertaken the following:

1. Achieve the objectives of the MAF SFF/Horticulture & Arable Industries/Regional Government Project: Nitrogen Managers for Environmental Accountability (NMEA) by January 2009, followed by:
  - End-2009 Hort Industry product group recognition of nutrient budgeting for all high risk activities; i.e. leaching from certain crops on different soil types; e.g. potatoes, onions, sweetcorn, winter grown green vegetables and some berryfruit and fruit; e.g. kiwifruit
  - February 2009 - NMEA developed 'Overseer (Hort)', based on HortResearch's SPASMO and Crop & Food's Soil and Plant Growth Models (ex LUCI), completed and rolled out
  - 2009 onwards – advocate with regional councils for the voluntary uptake of Overseer (Hort) by growers to be recognised in land and water plans, through permitted activity rules for fertiliser application via nutrient budgeting
  - March 2009 - Commence 6 months extension work with Overseer (Hort)
  - Late 2009 – Overseer (Hort) incorporated into New Zealand GAP (including the GLOBALGAP equivalent levels)
  - April 2010 - 25%<sup>1</sup> uptake of Overseer (Hort) by vegetable and relevant fruit growers by, April 2012 - 50% uptake and April 2014 - 75% uptake

---

<sup>1</sup> 25% of the growers should cover approximately 80% of the land under horticultural production.

- 2017 - Overseer (Hort) fully developed, 90% taken up by industry.
2. Develop Crop Production tools, for high-risk activities, optimising efficient use of nutrients and water inputs under continuing development, including:
    - Potato Crop Calculator operational 2007
    - Rolled out for limited commercial use late 2007, roll out continued through 2008
    - End of 2009/10 season - 25% uptake by growers, end 2012 - 60% uptake and end 2013 - 75% uptake
    - 2015 - Potato Crop Calculator fully developed, 90% taken up by industry
  3. Continue extension work on irrigation efficiency including irrigation distribution performance and advocating soil moisture monitoring and best management practices for irrigation management (INZ Code of Practice linkage).
  4. Continue to promote the uptake of the GROWSAFE<sup>®</sup> Calculator (used to predict the environmental fate of agrichemicals used on crops across the country, by combinations of crop, region (climate), soil type, and agrichemical) to all affiliated product groups and growers.

## **7. Horticulture New Zealand's key messages on the Proposed One Plan**

- 7.1 The horticultural industry is taking active steps to ensure that best management practices are known and adopted by growers. The research programme and commitments are evidence of the extent to which this is being undertaken.
- 7.2 Horticulture New Zealand seeks to ensure that growers only have to comply with one set of regulatory requirements. Growers are already meeting the requirements of NZGAP – the Fresh Produce Approved Supplier Programme which growers need to be able to supply supermarkets and export markets. Compliance with NZS 8409:2004 Management of Agrichemicals, the Fertiliser Code of Practice and Spreadmark are part of the NZGAP requirements. In addition resource consents for water takes and discharges have requirements that need to be met.

Therefore growers are already ensuring that best practice is met through compliance with such programmes. It is sought that Regional Plans recognise such programmes to avoid duplication in compliance requirements.

- 7.3 Activity status is controlled in the proposed Plan by setting nutrient discharge levels on the basis of land use class. This does not provide the level of accuracy or definition needed to control the activities with the most effect. The result is that many activities with potentially minor effects have controlled activity status.
- 7.4 Controlled activity status presents many problems for growers that have shared or lease land arrangements. It is our understanding that the land use consents go with the title of the property and are the responsibility of the landowner, not the grower. This creates social and contractual issues that may result in a dramatic decrease or halt to lease and shared land arrangement which provide for more sustainable cropping rotations, as I have described in Section three above.

- 7.4 Setting water quality standards at the regional level does not provide enough input for the complete range of uses and users at a catchment level. Horticulture New Zealand advocates that communities of interest should be provided with a public process to identify the values community values on a catchment scale.
- 7.5 We would also suggest that allocation models, be they for discharges or for water takes should take full account of the economic efficiency of the allocation and the community values (allocative efficiency) for each catchment.
- 7.6 There is a greater emphasis on environmental and economic aspects in the Proposed One Plan than the social and cultural aspects which provide the fabric of the community structure throughout the region.

## 8. Overall Proposed One Plan Philosophy

The Officer Report has set out the overall philosophy which underpins the One Plan and the core principles on which it is based. This is included here in italics for ease of reference.

*The set of core principles:*

***The target audience:*** *people who are in the business of resource management (including resource users)*

***The One Plan will be:***

- *the "one-stop-shop" for all Horizons environmental policy*
- *written in plain English wherever possible (ie. outside of the key policy/regulatory sections of the plan)*
- *clear and concise (ie. the plan itself will be pared right back through the use of supporting documents)*
- *presented in a user-friendly format (ie. through a simple document navigation system)*
- *interactive (ie. either via web or searchable CD format)*

***The One Plan will:***

- *focus on addressing the "Big Four" environmental issues for the Region (see Big Four info Sheet)*
- *reflect what the community wants for the environment (through extensive front-end consultation)*
- *promote efficient resource use whilst protecting environmental bottom lines*
- *target what Horizons can actually achieve in the next 10 years*
- *permit day to day resource use activities that have minor adverse effects*
- *embrace a more non-regulatory approach*
- *promote a 'permissive regulatory approach' – through industry self regulation and use of Codes of Practice*
- *provide clarity and certainty for resource users*

The Recommendation OVR 1 seeks that this overall philosophy and intent be kept in mind throughout the hearings on the proposed One Plan so that the focus is maintained.

While that is a valid recommendation it also needs to be borne in mind that many of the submissions appear not to see this proposed One Plan philosophy worked out in practice in the Plan. For instance the Plan has a principle to embrace a more non-regulatory approach. Many of the landowners who are likely to be faced with the need for resource consent for day to day operations on farm are unlikely to consider that the philosophy is embraced in the Plan.

The Hearings Panel will need to determine whether the overall philosophy and intent is appropriate and whether the actual plan provisions give adequate effect to that philosophy.

**Decision Sought:** Ensure that the underpinning philosophy of the One Plan is tested throughout the hearings process to ensure that the principles do adequately reflect the horizons region.

## 9. Submissions addressed in the Officers Report on the Overall Plan

Horticulture New Zealand has submissions or further submissions addressed in the Overall Plan Officers Report:

- General Content of the Proposed One Plan
- Section 32 and cost benefit analysis
- Terms used in the Proposed One Plan

## 10. Specific submissions

Where appropriate this evidence contains tables outlining Horticulture NZ's submission of relevance to this hearing. I will generally take these tables as being read in this hearing.

### 10.1 General Content of the Proposed One Plan

Submission F/S	No	Decision Sought:	OR Pg	OR Recommendation
HNZ	FS 531/7	Supported in part a submission by Ruapehu District Council (151/15) regarding use of codes of practice	28	Accept in part
HNZ	FS 531/6	Supported in part a submission by Ruapehu District Council (151/9) regarding the maps in the One Plan	29	Accept in part

#### 10.1.1 Maps in the One Plan

Horticulture New Zealand supported a submission from Ruapehu District Council (151/9) regarding the maps in the Plan because the scale and detail of the maps in the Plan are inadequate for regulatory purposes. The Officer Report has responded by stating that most submissions on the maps relate to *Schedule A: Highly erodible land* and that this be removed and replaced with a descriptor.

The problems of scale with the maps don't just exist within Schedule A. For instance *Schedule D11 Aquatic sites of significance* (Pg D-27) is also difficult to interpret. Relying on a descriptor may be adequate for council staff but Horticulture NZ suggests the Plan be made slightly more user friendly. Users should be able to ascertain quickly whether their land is 'in or out' of certain categories. In terms of the application rules in the Plan, this is absolutely critical.

Horticulture New Zealand has requested maps in a PDF at a greater scale from horizons



staff to enable preparation for hearings and my understanding is that these will be provided. It would be useful though, and may save time if submitters can access accurate and clear information through the map resource that Horizons Regional Council has.

It is suggested in the Officer Report that maps down to an individual property level will be available on the horizons website. The usefulness of this is based on the presumption that a user will have a computer and broadband connection and be able to download such files. There are difficulties with rural broadband and general computer use so I would suggest that some alternative are available.

**Decision Sought:** Seek that the maps be provided at such a scale that a property owner is able to determine if their property is included in specific categories. E.g for highly erodible land, coastal zoning and aquatic sites of significance.

#### 10.1.2 Codes of Practice

Horticulture New Zealand supported in part a submission by Ruapehu District Council (151/15) regarding the use of codes of practice. Other submitters have also made submissions on the reliance on codes of practice, standards and guidelines in the Plan.

Horticulture New Zealand supports the use of codes of practice, standards or guidelines where the document contains industry best practice and has been developed through an open consultation process.

The Officer Report sets out the legal requirements for inclusion of external documents in a Plan and Horticulture New Zealand concurs with that summary.

It is important to recognise that the Environment Court has accepted the use of codes of practice, standards and guidelines but have set clear parameters as to how they may be used. For instance in *Bodle v Northland Regional Council* (A225/2004) the Court determined that use of a standard was appropriate but that it needed to be clear, certain and specific. In this case the Plan references certain sections of the NZ Standard 8409, not the whole document.

While some submitters raise concerns about the inclusion of a particular version of an external document it needs to be recognised that plan users must be clear which document they need to comply with. An undated reference, or changes to a version without changing the plan does not provide that certainty.

Therefore in incorporating any external documents into the Plan the panel needs to be mindful of these parameters. In addition Horticulture New Zealand seeks that council only adopt those documents that have been developed through a public consultation process rather than being internal documents, without stakeholder input. This is important if a document is to get the buy in of all parties.

**Decision Sought:** Accept the use of codes of practice, standards and guidelines in the One where they represent industry best practice and have been developed through a public consultation process.

#### 10.2 Section 32 and cost benefit analysis

Submission F/S	No	Decision Sought:	OR Pg	OR Recommendation
HNZ	FS 531/8	Support MAF (373/66 Withdrawn) to include industry based accreditation schemes	53	Reject

10.2.1 Horticulture New Zealand supported a submission by MAF (373/66) which sought that the Plan includes provision for industry based accreditation schemes. The submission has since been withdrawn but it is our understanding that the further submission remains active. The submission has been included in the Section 32 part of the Report in that it seeks an alternative method. However the Officer Report does not specifically provide comment on the substance of the submission.

Horticulture New Zealand supports the use of industry based accreditation schemes because, as we have stressed earlier in this evidence, it can avoid duplication in compliance. In respect of horticulture growers are already meeting the requirements of NZGAP – the Fresh Produce Approved Supplier Programme which growers need to be able to supply supermarkets and export markets. This is an accreditation scheme that is externally audited by a third party. NZGAP requires compliance with NZS 8409:2004 Management of Agrichemicals, the Fertiliser Code of Practice and Spreadmark are part of its requirements. In addition it includes resource consents for water takes and discharges requirements that need to be met. Where a grower requires accreditation for overseas markets NZGAP is extended to GlobalGAP to meet the additional external requirements. For instance all export kiwifruit and most apples require GlobalGAP but need NZGAP for domestic sales.

The One Plan already includes one industry accreditation scheme. Rule 12-2 provides for harvesting of production forestry as a controlled activity, thereby requiring resource consent. However the rule does not apply to production forestry activities that are accredited by the Forestry Stewardship Council programme. Where there is accreditation under the programme the activity is a permitted activity under Rule 12-1.

Horticulture New Zealand is seeking, and working with council officers to provide a similar process referencing the NZ GAP compliance system, with a default mechanism for those who are not compliant with NZ GAP.

### 10.3 Terms used in the Proposed One Plan

Submission F/S	No	Decision Sought:	OR Pg	Recommendation
HNZ	357/2	That a descriptor is added either at the start of the Glossary section or an appropriate section of the Plan that states that terms defined in the 'Glossary' are identified in the text of the Plan with an asterisk *	64	Accept
HNZ	357/3	Include relevant definitions from the RMA in the One Plan so that users have ready access to all necessary terms	64	Reject
HNZ	357/25	Amend the definition of property to be all that land which is managed by the same business entity.	73	Reject

- 10.3.1 Horticulture New Zealand supports the identification in the Plan of terms that are defined in the Glossary. These are indicated with an asterisk\*. However there appears to be no where in the Plan where it is explained what the asterisk means. Therefore for the ease of plan users a descriptor should be added at the start of the Glossary or elsewhere in the Plan to make this clear.

The Officer Recommendation 4.6.3 b) is that an explanation is included in the Glossary and this recommendation is supported.

**Decision Sought:** Accept Officer Recommendation 4.6.3 b)

- 10.3.2 A number of submitters, including Horticulture New Zealand, sought that relevant definitions from the RMA be included in the One Plan. The Officer Report rejects these submissions on the basis that there is no need for repetition with the Act. Reasons given are that definitions may be changed by legislation and that the definition may be added to by case law. While case law may inform the interpretation of a definition it does not change the core definition in the Act. Therefore this should not be a reason to reject the submissions. There may be changes to the definitions through changes to the legislation but these are clearly signalled and likely to result in the need to reassess the Plan in terms of the continued relevance of the terms.

The Officer Report seeks to assume that all Plan users will have a copy of the RMA to source the definitions and will also know which of the terms in the Plan are defined in the RMA. The terms used in the Plan that are defined in the RMA are not identified with an asterisk.

It is recommended that the Hearing Panel request that the officers do a word search of the Plan and develop a list of terms that are used in the Plan which are specifically defined in the RMA. This would assist submitters and the Panel to determine the extent to which this is a relevant issue.

Many plans do include the RMA definitions in the Glossary for the ease of Plan users and Horticulture New Zealand supports that this is appropriate for the One Plan.

**Decision Sought:** Include terms in the Glossary which are also defined in the RMA and identify them with an asterisk in the Plan

10.3.3 Definition of 'property'

A number of submitters, including Horizons Regional Council and Horticulture NZ sought changes to the definition of property. Horticulture NZ's submission expressed concern at the ambiguous nature of the definition which is potentially confusing given the number of instances it is used in the Plan and is fundamental to how the plan will be implemented as many rules are contingent on the definition of property.

The definition is confusing and ambiguous as there are two criteria:

- all allotments in a single certificate of title; and
- it includes all adjacent land that is in the same ownership.

Adjacent land in the same ownership may not be held in the same certificate of title therefore it is not clear from the definition if each title constitutes a 'property' or the combination of titles held in the same ownership.

The application of property based criteria in the Plan does not take account of land that is under the same management and operation but not necessarily in the same ownership. For instance a grower may own a certificate of title and then lease an adjoining property and run them as one operation. Yet within the application of the definition in the Plan they are regarded as two properties. This becomes fundamental to how many individual consents may be required under rules such as Rule 13-1. If it is on a per property basis then the number of consents that will be required significantly increases.

Because of these factors Horticulture New Zealand sought that the definition of property "be all that land which is managed by the same business entity." The Officer Report rejects this wording and does not address the issue of leased land in the Report.

A revised wording is recommended as follows:

*"Property refers to an allotment and all adjacent allotments in the same ownership. Land is considered to be adjacent if it is separated by a legal road. A legal road is considered to be a property for the purposes of this plan."*

This definition is based on 'ownership' rather than 'management' as sought by Horticulture New Zealand and Federated Farmers. If the issues raised by Horticulture New Zealand are not addressed through the definition of property then changes will be sought where the term is used in the Plan.

**Decision Sought:** Amend the definition of property to be: "All that land which is managed by the same business entity."

## **Conclusion**

As this is the first hearing of many we would like to make a couple of comments on the structure of the Officers Reports.

- It would be helpful to submitters if an index of submitters could be included in the Officer Report. This would help submitters to easily and readily identify where in the report their particular submissions and further submissions may be found. An example is provided from Environment Canterbury who use this method in all their Officer Reports.
- While the table of submitters and decisions sought needs to be in landscape it is somewhat more difficult to read the submission summary and recommendations in landscape across the page. It would be useful if these could be put into columns for the ease of the reader.
- We would also like to acknowledge the work of horizons staff in assisting preparing for the hearings, representing their council at grower workshops and meetings, and answering many queries.

Thank you again, for the opportunity to present this evidence in support of the Horticulture New Zealand's submissions and further submissions.

**Chris Keenan**  
***Manager – Resource Management and Environment***  
**Ends**

