

Re: proposed Otago RPS 2021 - Submission of Horticulture New Zealand



Rachel McClung <Rachel.McClung@hortnz.co.nz>

To ○ RPS

Cc ○ Michelle Sands

Submission - Sector stakeholder

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Horticulture New Zealand RPS21_0236

Kia ora,

Re: proposed Otago RPS 2021 - Submission of Horticulture New Zealand

Please find attached the submission of HortNZ to the proposed Otago Regional Policy Statement.

Ngā mihi

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SUBMISSION

SUBMISSION ON

Proposed Otago Regional Policy Statement 2021

03 September 2021

To: Otago Regional Council

Name of Submitter: Horticulture New Zealand

Contact for Service:

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OVERVIEW

Submission structure

- 1** Part 1: HortNZ's Role
An overview of Horticulture New Zealand (HortNZ).
- 2** Part 2: Submission
Overarching submission themes, including rationale for the amendments sought in this submission. This includes: Wellbeing, Food Security, Transition to Low Emission Economy, Highly Productive Land, Horticulture in Otago Region, and the Importance of Water for Horticulture.
- 3** Part 3: Submissions table
Submissions sought in relation to specific provisions of the proposed Otago RPS 2021.

Executive Summary

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. HortNZ is active within the RMA system, representing the interests of growers in district, regional and national planning processes. This submission summarises the key issues for horticulture.

Key high-level issues for horticulture

Wellbeing

People are part of the natural environment, and the social, economic, and cultural wellbeing of all people must be provided for within natural environmental limits. Horticulture produces healthy food to support the essential health needs of people and provides jobs and export earnings which support the social, economic, and cultural wellbeing of our population.

Food Security

Food security is a nationally important issue which needs to be addressed at a strategic level, it is integral to human health. It is critical that New Zealand's domestic food supply (and food security) is one of the outcomes that is promoted and considered when making trade-offs that will inevitably be required to meet environmental limits and outcomes.

Transition to Low Emissions Economy

Diversification to horticulture presents an opportunity to reduce emissions. It is important that decision makers can assess the benefits of land use change.

Highly Productive Land

HortNZ supports recognition of the importance of highly productive land (HPL) as an environmental outcome within the proposed Otago RPS. But seeks amendments to promote its use (for primary production), as well as protection from inappropriate subdivision, use and development. We consider the management of HPL must be addressed in the RPS.

Importance of Water for Horticulture

Growing fruits and vegetables in all regions of New Zealand, including Otago, is reliant on reliable supplies of fresh water that are suitable for sustained crop production, post-harvest washing and processing. Water is essential for food production.

Horticulture in the Otago Region

There are approximately 191 commercial growing operations in the Otago Region. These include a wide variety of both fruit and vegetable crops. Currently the highest concentrations of growers are in the Central Otago and Waitaki Districts. However, there are growers located outside these areas. The region is nationally recognised for its unique productive capacity and place in the national food supply network.

Amendments sought to the proposed Otago RPS

Without limiting the generality of the above, HortNZ's specific submissions are detailed in the Table in Part 3 below. HortNZ seeks decisions on the proposed Otago Regional Policy Statement as set out in the table, or alternative amendments to address the substance of the concerns raised in this submission and any consequential amendments required to address the concerns raised in this submission.

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.

Submission

Horticulture New Zealand (HortNZ) thanks Otago Regional Council for the opportunity to submit on the proposed Otago Regional Policy Statement 2021 and welcomes any opportunity to work with the Otago Regional Council and to discuss our submission.

HortNZ could not gain an advantage in trade competition through this submission.

HortNZ wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

The details of HortNZ's submission and decisions we are seeking are set out below and in the table in Part 3 of this submission.

1. Wellbeing

People are part of the natural environment, and the social, economic, and cultural wellbeing of all people (including their health and safety) must be provided for within natural environmental limits. It is essential that all four well-beings and the health and safety of people are provided for within the proposed Otago Regional Policy Statement.

Horticulture produces healthy food to support the essential health needs of people and provides jobs and export earnings which support the social, economic, and cultural wellbeing of our population.

A global study into the gap between fruit and vegetable production and recommended consumption concluded that achieving recommended consumption of fruit and vegetable "*will require concentrated efforts across the food system to reorient investments and interventions to prioritise fruits and vegetables more. It will require additional investments in research and development to encourage more fruit and vegetable production, while decreasing its environmental footprint*". It also noted that greater fruit and vegetable consumption could be 'win-win' for both public and ecological health.¹

1.1. Resilience and mental health

A lot of resource management regulation has been negative from the perspective of production of healthy food. The lack of recognition of the positive contribution of the sector is impacting on the mental health of growers.

We have heard clearly from growers that they need more time to consider and respond to the changes being proposed, and that they seek a streamlined and risk-based approach to future regulation. As the proposed RPS is the overarching

¹ Mason-D-Croz et al. (2019). Gaps between fruit and vegetable production, demand, and recommended consumption at global and national levels: an integrated modelling study.

strategic planning document for the Otago Region, our submissions below align with the risk-based approach.

2. Food Security

Food security is a nationally important issue which needs to be addressed at a strategic level. The Otago Regional Policy Statement is a strategic document. While New Zealand is a net food exporter, many of the vegetables and some of the fruit that we grow are only for domestic food supply.

Growing of vegetables for domestic supply is integrated with vegetables grown for export in crop rotations. We also have a national food producing system that relies on growing vegetables and fruit in pockets of highly productive land, with good climate and access to freshwater. Fruit and vegetables are essential for the human health of New Zealanders, including those living in Otago.

Over 80 percent of vegetables grown in New Zealand are for domestic consumption. Deloitte's report on the 'Pukekohe Hub'² described three distribution channels: retail, foodservice and exports. In this area, the most heavily used channel was retail which distributes 83 percent of produce. The other two channels - food services and export - distribute 7 percent and 10 percent, respectively.³ Similarly, KPMG's 2017 report on New Zealand's domestic vegetable production demonstrated that for the ten key vegetables that are staples of New Zealand diets, the vast majority are consumed or processed in New Zealand.⁴

For most vegetable crops, the domestic market is the primary market, but many growers produce export crops within their rotations for practical (soil health) and economic reasons. For example, onions which are predominately grown for export are grown with other vegetables crops in rotation. Onions grown in rotation with non-alliaceae crops promote soil health. Export income provides greater economic resilience.

New Zealand also has an important role in exporting fresh vegetables to the Pacific Islands. For example, in 2016 76% of total exported potatoes went to Fiji, 87% of exported Kumara and 82% of exported cauliflower, 75% of exported cabbage went to the Pacific Islands. NZ has an important role in the food security of Pacific Islands.⁵

New Zealand and our Pacific Island neighbours are too remote to import many fresh vegetables from elsewhere in the world. Most vegetables that New Zealand imports are processed. In 2019, the most imported vegetables were preserved tomatoes and frozen potatoes.⁶

² The growing area that straddles the Auckland and Waikato boundaries and is a key producer of vegetables in New Zealand.

³ Deloitte "New Zealand's Food Story: The Pukekohe Hub" Prepared for Horticulture New Zealand (August 2018)

⁴ KPMG, 2017 New Zealand's domestic vegetable production: the growing story.

⁵ https://wits.worldbank.org/CountryProfile/en/Country/WSM/Year/2019/TradeFlow/Import/Partner/all/Product/16-24_FoodProd

⁶ Plant and Food, Fresh Facts 2019

Some fruit crops grown in New Zealand have a predominately export focus – for example, it has been estimated by NZIER that 95% of kiwifruit and 83% of apples are exported⁷. These two crops account for approximately 75% of New Zealand’s fruit and vegetable exports⁸. The next largest fruit export crops are avocados, cherries, and blueberries.

Many fruit crops are grown mainly for the domestic supply. For example, nectarines, peaches and plums, oranges, mandarins, feijoas, tamarillos, and strawberries.⁹

Please note that kiwifruit, avocados, oranges, mandarins, feijoas and tamarillos are not grown commercially in the Otago Region.

2.1.1. NATIONAL FOOD SYSTEM

The production of fruit and vegetables (both outdoor growing and covered crops) in New Zealand operates as part of a national system, and therefore warrants planning recognition.

Compared to 40-50 years ago, there is a greater reliance now on large food hubs for vegetable growing – such as Pukekohe, the Horowhenua and Canterbury – to feed New Zealand’s population.¹⁰ New Zealand’s vegetable-growing regions supply markets at different times of the year; a sustainable, year-round supply of produce for New Zealand is only possible if the different growing regions work in conjunction to ensure that seasonality and other variables, such as diseases and weather, do not interrupt that supply.

Similarly, fruit crops are predominately grown in certain regions in response to the specific soil and climatic conditions required, and where key infrastructure exists – for example, avocados are predominately grown in Bay of Plenty and Northland, summerfruit predominately in Hawkes Bay and Central Otago, apples predominately in Tasman and Hawkes Bay, citrus predominately in Gisborne and Northland.¹¹

2.1.2. FOOD INSECURITY AND HEALTH LOSS

Ministry of Health data indicates that only 33.5% of adults and 44.1% of children are meeting fruit and vegetable intake guidelines.¹²

Despite this, on the whole, New Zealand produces more food than we can consume (noting this is not true of all crops – as explained above). Many New Zealanders live in food insecurity. A 2019 Ministry of Health study analysed household food insecurity among children in New Zealand, it estimated that 174,000 (19%) of all children in New Zealand live in food-insecure households.¹³

⁷ NZIER, 2019. Farm share of retail prices. Analysis of domestic farmer margins in a globalised world.

⁸ Fresh facts 2020 data, as a proportion of total horticultural exports (excluding wine, hops, and ‘other horticulture’).

⁹ FreshFacts 2020

¹⁰ KPMG, 2017 New Zealand’s domestic vegetable production: the growing story.

¹¹ FreshFacts 2020

¹² New Zealand Health Survey Data. Accessed here: https://minhealthnz.shinyapps.io/nz-health-survey-2019-20-annual-data-explorer/_w_b6ac76b1/#!/explore-topics

¹³ Ministry of Health. (2019). *Household food insecurity among children, New Zealand Health Survey*

There is an extensive body of research indicating that children experiencing household food insecurity have lower fruit and vegetable intake, diets higher in fat, and are at an increased risk of obesity.¹⁴

In New Zealand, for families living in deprived areas, increases in fruit and vegetable prices, especially around their off-season, compel them to substitute the purchase of healthier whole fruit and vegetables with cheap energy-dense and nutrient-poor products.¹⁵

Just as maintaining our environmental brand is of value to our high value export products, so too is ensuring that all New Zealanders have access to the healthy food. This is what we built our export reputation on.¹⁶

There are complex social and economic reasons that people struggle to meet their nutritional needs. Growers are passionate about providing healthy produce. However, it is still a business and for them to continue to grow the healthy food we rely on, it has to be economically viable.

Regulatory pressure is preventing the expansion of vegetable growing from keeping up with population growth. This is predicted to result in increased cost for consumers, with tangible health consequences.

Health costs of increase in vegetable prices

Otago University has recently modelled the potential health impacts of increased vegetable prices. This study found that using the health costs of an increase in vegetable prices of 43 - 58 percent, (Deloitte, 2018) would be a loss of 58,300 - 72,800 Quality Adjusted Life Years and health costs of \$490 - \$610 million across the population.¹

2.1.3. PRESSURE ON FOOD PRODUCTION

New Zealand's existing food production systems, including in Otago and particularly Central Otago, are coming under increased pressure from population growth (and competing land use demands reducing availability of highly productive land), climate change, and the need to improve environmental outcomes.

Supporting evidence to the Climate Change Commissions advice to Government (on emissions reduction) notes that, "... *if the production of items grown primarily for domestic consumption (such as some fresh vegetables) contracts, as this could drive prices up and exacerbate existing food and nutrition access for some vulnerable groups*". There is a misconception that there is not a risk of reduced food production, as the horticulture industry as a whole is growing. However, it is generally speaking export-oriented crops which are most likely to expand - this alone does not guarantee New Zealand's food security, as it represents only a subset of the crops grown in New Zealand.

¹⁴ Ibid.

¹⁵ Rush, E., Savila, F., Jalili-Moghaddam, S., & Amoah, I. (2018). Vegetables: New Zealand Children Are Not Eating Enough. *Front. Nutr.*

¹⁶ <https://assets.kpmg/content/dam/kpmg/nz/pdf/2020/05/agri-food-now-normal-future.pdf>

It is also important to highlight the fragility of the vegetable sector particularly. There are number of compounding pressures on growers, including:

- Market dynamics - it is clear in the Commerce Commission's draft report into the retail grocery sector (a critical route to market) that there is limited competition, which gives suppliers few options and creates an imbalance of bargaining power.¹⁷ While it is desirable socially, for vegetables to be affordable for consumers, growers are price takers and often run with very tight profit margins as a result. A more sustainable economic model would include a greater proportion of the profit being returned to growers, to ensure the system is economically sustainable and competition within the growing market is retained.
- Increasing competition for natural resources - including land (from urban development both directly and indirectly through reverse sensitivity pressures).
- Competition and availability of water for irrigation, which is essential for growing fruits and vegetables.
- Unworkable discharge allocation regulation where vegetables are becoming very strictly regulated within regionally inconsistent frameworks.¹⁸
- Unworkable regulation, that prevents and stifles crop rotation.¹⁹
- Increasing labour availability challenges²⁰, and labour costs²¹, which growers have limited ability to pass on to consumers due to market dynamics.
- Disruption of export markets due to Covid-19, impacts on profit margins for businesses.²²
- Subsidised competitors, the European Commission recently announced €270 billion in support for growers and farmers through the Common Agricultural Policy (CAP) from 2023-2027.

In the past ten years due to competition of land, the area in vegetable growing has declined²³, and the price volatility has increased²⁴. 76% of vegetable growing area is managed by 115 businesses²⁵. In the face of continuing pressures there is a real

¹⁷ Commerce Commission (2020). [Market study into the retail grocery sector. Draft report - executive summary.](#)

¹⁸For example, PC2 Horizons
www.horizons.govt.nz/HRC/media/Media/One%20Plan%20Documents/One%20Plan%20Reviews%20and%20Changes%20Documents/Horizons-Regional-Council-Plan-Change-2-Recommendations-of-the-Hearing-Panel.pdf?ext=.pdf

¹⁹ <https://www.waikatoregion.govt.nz/assets/WRC/WRC-2019/Volume-2-Proposed-Waikato-Regional-Plan-Change-1-Decisions-version.pdf>

²⁰ Skilled labour - tractor drivers, RSE

²¹ Labour intensive, % of wages.

²² <https://www.tomatoesnz.co.nz/latest-news/december-2020-update/>

²³ <https://www.stats.govt.nz/indicators/agricultural-and-horticultural-land-use>

²⁴ https://www.stats.govt.nz/indicators/consumers-price-index-cpi?gclid=Cj0KCQjw6eTtBRDdARIsANZWjYyZlWVW0UmAjVys4HN_NIOFzElbLZmxuI9ladZmkXB2K6nyffRSOQxQaAtz8EALw_wcB

²⁵ NZGAP data

risk that the exit of only a few large players in the industry would have a significant impact on food supply.

2.2. Approach sought in the proposed Otago Regional Policy Statement

Food production, food supply and food security must be issues that are promoted and considered alongside other uses for essential human health, when making trade-offs that will inevitably be required to meet natural environmental limits. This is particularly relevant in peri-urban areas where there is competition for resources from urban growth.

3. Transition to a Low Emissions Economy

In the context of greenhouse gas emissions reduction targets, the Paris Agreement highlights the importance of food production and food security, recognising the "*fundamental priority of safeguarding food security ...*" and noting the need to adapt and foster resilience and lower emissions, in a manner that does not threaten food production. This same consideration is relevant to resource management more broadly.

3.1. Food production in a low emissions economy

The emissions trading scheme was established as market instrument for managing emissions. The experience of the glass house sector has been that the Emissions Trading Scheme (ETS) price has not driven reductions in emissions, because currently there are few viable alternatives for heating glass houses. The glasshouse sector is at risk of becoming economically unviable due to ETS costs. If growers no longer produce these crops in NZ, this will result in lesser variety of fruits and vegetables available to NZ consumers, and substitution with imported products.

It is our opinion, that the transition to developing indoor growing and outdoor food systems that have lesser emissions, will require an integrated approach, that includes behaviour change, investment in research, infrastructure, and technology as well as regulatory signals. The proposed Otago Regional Policy statement has a part to play with respect to strategic policy directions for enabling food production in the transition to a low emissions economy within Otago.

The primary sector partnership for managing agriculture emissions is an example of integrated approach.

He Waka Eke Noa

He Waka Eke Noa is a climate action partnership with the primary sector, Government and Maori, of which HortNZ is a partner. The partnership is designing an alternative to the ETS for reducing and offsetting agricultural emissions. The He Waka Eke Noa system includes a price and farm planning to drive on-farm behaviour change.

The He Waka Eke Noa approach acknowledges that a price in isolation cannot drive the systems wide change required to reduce agricultural emissions, and what is needed to achieve change is an integrated approach including farm planning supporting behaviour change.

The farm level response through He Waka eke Noa, will need to be supported by a wider network of changes including investment in research, infrastructure and technology as well as strategic planning and regulation.

3.2. Enabling land use change to horticulture

Diversification to horticulture presents an opportunity to reduce emissions while increasing food production, as identified by the Climate Change Commission.

'Ināia tonu nei: a low emissions future for Aotearoa' includes the assumption (in the Demonstration Path) that 2,000 ha of land will be converted to horticulture per year from 2025 and notes that the Commission expect this could increase if "barriers - such as water availability, labour, supply chains and path to market - are addressed". Opening up more opportunities for conversion to lower emissions production systems and land uses, including horticulture, is listed as a critical outcome.²⁶

The advice also notes that further land use change from livestock agriculture into horticulture and forestry (from 2021, additional 3,500 ha per year converted from dairy) would be required to meet the more ambitious end of the 2050 methane target if new technology does not come through.

3.3. Approach sought in the proposed Otago Regional Policy Statement.

From HortNZ's perspective it is important to not create barriers to climate change adaptation and/or mitigation and enable long-term climate change adaptation and/or mitigation, though projects such as water storage and provisions which enable growing areas to move between water catchments, zones, districts and regions.

4. Highly Productive Land

For future generations, it is critical that Highly Productive Land (HPL) is protected from the continual trend of cumulative loss and loss of productive capacity due to

²⁶ <https://www.climatecommission.govt.nz/our-work/advice-to-government-topic/inaia-tonu-nei-a-low-emissions-future-for-aotearoa/>

reverse sensitivity and competition for natural resources. Any protection of HPL from inappropriate subdivision, must also recognise its value for current and future generations for food production and enable its use for food production.

We accept that there needs to be flexibility to develop highly productive land in some places. What is important in our view, is that urban development and productive land are considered together to provide a planned approach so new urban areas are designed in a manner that maintains the overall productive capacity of highly productive land.

We need to ensure economic and environmental sustainability of primary production are taken into account when protecting HPL. Otherwise, we risk stranded assets being sold off as poorly performing lifestyle blocks.

Multiple factors make land 'highly productive' beyond just soil - this makes providing a clear policy for HPL important.

4.1. Recognising the Value of HPL

HortNZ's submission on the proposed National Policy Statement for Highly Productive Land (NPS-HPL) was very clear that protection of HPL, without also enabling its use for food production is an unacceptable outcome and would further disadvantage an already economically fragile domestic food system.

In our view, it is important that the definition of highly productive land includes the key natural and physical resources that contribute to the land's productivity. We also recognise that some of these natural and physical factors can be modified with policy and investment, and that all of these factors contribute to the productive capacity of land.

4.2. Protecting HPL from loss to inappropriate development

Highly Productive Land is a finite resource and intergenerational asset that is under threat in New Zealand - most significantly due to urban development, as reported in 'Our Land 2021' which states that the area of HPL that was unavailable for horticulture because it had a house on it increased by 54% from 2002 to 2019.²⁷

HPL can be lost directly to urban development and inappropriate subdivision creates reverse sensitivity issues (complaints about spray, noise, and amenity).

The importance of HPL, and the need to manage this natural resource strategically, was clearly articulated in the consultation on the proposed NPS-HPL, including that the lack of clarity under the RMA means highly productive land is given inadequate consideration by local government:²⁸

"The value of this land for primary production is often given inadequate consideration, with more weight generally given to other matters and priorities. This absence of considered decision-making is resulting in uncoordinated urban expansion over, and fragmentation of, highly productive land when less productive land may be available and better suited for urban use. This is preventing the use of

²⁷ Our Land 2021. Ministry for the Environment.

²⁸ Valuing Highly Productive Land: A discussion document on a proposed national policy statement for highly productive land, Ministry for Primary Industries, August 2019.

this finite resource by future generations... National direction on highly productive land could provide councils with a clearer framework for managing this resource and assessing trade-offs between competing land uses ...”

There are many examples of HPL being lost in New Zealand.

HortNZ seek that the outcome related to the protection of HPL is focused on protecting the productive capacity of highly productive land from inappropriate subdivision, use and development and seeks an amendment so that the Act promotes the use of highly productive land for food production, both for domestic and export.

We have made numerous submission points in the table below to strengthen recognition of HPL in decision making.

5. The importance of water for horticulture

The values of land for food production are inseparable from access to freshwater. Water is essential for food production. Growing fruits and vegetables in all regions of New Zealand, including Otago, is reliant on reliable supplies of fresh water that are suitable for sustained crop production, post-harvest washing and processing.

Without access to clean freshwater to grow fruits and vegetables, and to wash and prepare food for market, the value of land for food production is compromised.

The values of land and water are interlinked for food production, specifically growing fruits and vegetables.

6. Horticulture in Otago Region

There are approximately 191 commercial growing operations in the Otago Region. These include a wide variety of both fruit and vegetable crops. Currently the highest concentrations of growers are in the Central Otago and Waitaki Districts. However, there are growers located outside these areas. The region is nationally recognised for its unique productive capacity and place in the national food supply network.

The combination of soil and climate means that Central Otago is especially suited to growing high quality crops. Stone fruit such as cherry, apricots, peaches and nectarines, and pipfruits (predominantly apples) are the dominant crops.

Whereas, in the Waitaki District area, a wide variety of fruit and vegetable crops are grown. These include yams, carrots, courgettes, leeks, cabbage, pumpkin, potatoes, lettuce, broccoli, cauliflower, silverbeet, spring onions, celery, leafy greens, salad greens, brussel sprouts, tomatoes, asparagus, cucumber, apples, pears, nectarines, peaches, plums, blackcurrants, raspberries, strawberries and cherries.

Central Otago is one of the main commercial growing areas in New Zealand for stonefruit and accounts for 59% of the planted stonefruit orchards. Others stonefruit regions include Hawkes Bay (31%), north of Auckland, Marlborough,

and Canterbury (10% combined)²⁹. Importantly, Summerfruit New Zealand have advised that 85% of cherry orchards are in the Central Otago District. Cherries are a high value crop and Central Otago is a critical cherry growing area.

As mentioned above, cherries are a significant export crop for New Zealand, being the fourth highest horticultural earner (behind Kiwifruit, Apples and Avocados)³⁰. Viticulture is also a significant earner and strong contributor to the Otago economy.

The New Zealand (NZ) cherry industry has been undergoing significant expansion with production more than doubling since 2013. One of the key features of the Central Otago region is the high diurnal range (DRT). This is the difference between daytime and night-time temperatures. Due to the continental type climate in Central Otago, the DRT is large and is thought to positively contribute to increasing the sweetness of Central Otago cherries. This also assists with the firmness and crunch of the fruit which enhances the flavour, taste and general appeal to the consumer, particularly in the Asian markets.

NZ cherries are able to hold a consistent price of 50% or more over cherries from key competitors (i.e. Chile). To retain this market, it is of critical importance to the industry that the focus remains on a premium high value cherry.

²⁹ <https://www.summerfruitnz.co.nz/industry/regions/>

³⁰ <https://www.freshfacts.co.nz/files/freshfacts-2018.pdf>

Submission on proposed Otago Regional Policy Statement 2021

Without limiting the generality of the above, HortNZ seeks the following decisions on the proposed Otago Regional Policy Statement as set out below, or alternative amendments to address the substance of the concerns raised in this submission and any consequential amendments required to address the concerns raised in this submission.

Additions are indicated by bolded underline, and deletions by strikethrough text.

Provision	Support/ oppose	Reason	Decision sought
PART 1 INTRODUCTION AND GENERAL PROVISIONS			
Purpose	Support in Part / Oppose in Part	<p>Pursuant to Part 2 Section 5</p> <p>Sustainable management <i>means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being <u>and for their health and safety</u> while–</i></p> <p>Food is one of the necessities of human health, as is water and housing.</p> <p>The value of Aotearoa’s food production system is nationally recognised and regional value of food production is</p>	<p>Amend Purpose as follows:</p> <p><i>The ORPS responds to identified significant regional values and resource management issues relating to Otago’s environment, historic heritage, economy, <u>food production</u>, recreational opportunities and communities.</i></p>

		<p>expressed through the vision of four the five Freshwater Management Units:</p> <ul style="list-style-type: none"> • Clutha Mata-au FMU • North Otago FMU • Taieri FMU • Catlins FMU <p>Despite this the OPRS has not clearly responded to this significant regional value and associated resource management issues.</p>	
<p>Description of the Region</p>	<p>Support in Part / Oppose in Part</p>	<p>The regional value of food production is expressed through the vision of four the five Freshwater Management Units:</p> <ul style="list-style-type: none"> • Clutha Mata-au FMU • North Otago FMU • Taieri FMU • Catlins FMU <p>Despite this the OPRS has not clearly responded to this significant regional value and associated resource management issues.</p>	<p>Amend Description of the Region as follows:</p> <p><u><i>The region is nationally recognised for its unique productive capacity and place in the national food supply network.</i></u></p>

<p>How the Policy Statement Works - Cross Boundary Matters</p>	<p>Support in Part</p>	<p>The section introduces cross-boundary issues of relevance to Otago.</p> <p>The statement would be improved by noting that water is also a resource that crosses local authority boundaries and must be uniformly managed. This is particularly important for aquifer management.</p> <p>The statement would also be improved by noting that inconsistent regulatory approaches can be an administration and operational constraint for some activities - particularly primary production.</p>	<p>Amend How the Policy Statement Works - Cross Boundary Matter as follows:</p> <ul style="list-style-type: none"> • <i>resources that cross local authority boundaries which must be managed in a uniform manner, such as <u>water</u>, outstanding natural features, outstanding natural landscapes and significant natural areas</i> • <i>duplicated effort for local authorities, <u>provide administrative or operational constraints for activities</u>, and increased cost for people seeking <u>where consents might be required</u> for activities that occur across local authority boundaries or require resource consent from two or more consent authorities.</i>
<p>How the Policy Statement Works - Cooperation and partnerships with stakeholders</p>	<p>Support in Part</p>	<p>The submitter supports the statement that ORC will seek to establish and build upon working relationships with other resource management stakeholder. This should be translated into a method that commits to the formation of a rural advisory panel (as per Bay of Plenty</p>	<p>Translate statement into a method that commits to the formation of a rural advisory panel</p>

		Regional Council and Auckland Council) to assist with establishing and building upon relationships.	
Essential Human Health	New Provision	<p>Pursuant to Part 2 Section 5 Sustainable management <i>means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while–</i></p> <p>In the context of the ORPS there is a need to provide definition and clarity to what is being managed in respect of human health.</p>	<p>Add new definition:</p> <p><u>Essential human health: means the physiological needs of humans, it includes safe drinking water and sanitation, nutritious food, adequate shelter and warmth.</u></p>
Ambient air	New provision	The Air domain refers to ambient air quality but does not clearly state what ambient air actually is. It is important that it clearly distinguishes from localised air quality which is linked to a specific discharge source.	<p>Include a definition for ambient air as follows:</p> <p><u>Ambient air is air outside buildings and structures. It does not include indoor air, air in a workplace or contaminated air discharged from a source.</u></p>
Highly productive land	New provision	The term highly productive land is used in the RPS but is not defined. Identification of HPL will be included in	Include a definition for highly productive land as follows:

		the Land and Water Regional Plan by December 2023 (LF-LS-P19 and LF-LS-M11 (3)) However until such time there is a lack of clarity as to how HPL policies may be applied. The pNPS-HPL has a default definition for HPL in the interim and a similar approach is sought in the RPS.	<ul style="list-style-type: none"> a) <u>Land that has been identified as highly productive land using LF-LS-P19; OR</u> b) <u>where identification has not occurred as in a), land in the rural area that is classified as LUC1,2 or 3 as mapped by the NZ Land Resource Inventory or by more detailed site mapping.</u>
Interpretation - Rural Area	Support	Provides clarity for the plan reader	Retain as notified
Interpretation - Urban Area	Support	Provides clarity for the plan reader	Retain as notified
Abbreviations table	Support	Provides clarity for the plan reader	Retain as notified
National directions instruments	Support	Provides clarity for the plan reader	Retain as notified
PART 2 - RESOURCE MANAGEMENT OVERVIEW			
SRMR Significant resource management issues for the region - Introduction	Support in Part / Oppose in Part	<p>The introduction would be improved by noting that the Otago's people and communities rely on the natural resources of the land and 'soils'.</p> <p>Food production, food supply and food security have been bundled within the issue statement of economics. The issue</p>	<p><i>Otago's people and communities rely on the natural resources that Otago's environment provides to enable their social, economic, and cultural well-being. Natural resources include freshwater (i.e. surface and groundwater, wetlands, estuaries), land and soil, terrestrial and freshwater ecosystems, coastal and marine</i></p>

should be expressed after the last line of this introduction where social and cultural matters are addressed.

Figure 2 should also be amended to show food production, food supply and food security as a human health need and benefit along with housing.

The regional value of food production is expressed through the vision of four the five Freshwater Management Units:

- Clutha Mata-au FMU
- North Otago FMU
- Taieri FMU
- Catlins FMU

Despite this the OPRS has not clearly responded to this significant regional value and associated resource management issues.

ecosystems, and air, landscapes, vegetation and natural landforms.

From an economic perspective natural resources support, and are impacted by, agricultural industries (e.g. grazing, cropping, horticulture, viticulture), urban development, industrial development, infrastructure, energy generation, transport, marine industries (fishing and aquaculture), tourism and mineral extraction.

From a social and cultural perspective natural resources support and are impacted by food production, recreation, housing, and cultural activities (Refer Figure 2). Food production, food supply and food security relate to essential human health needs which are to be provided for through sustainable resource management.

This RPS identifies the eleven most significant issues impacting the Otago region. Issues firstly considered include natural hazards, climate change, food production, pest species, water quantity and quality, and biodiversity loss,

			<i>collectively the “natural asset-based issues”.</i>
SRMR-I1 - Natural hazards pose a risk to many Otago communities - Statement	Support in Part / Oppose in Part	The statement would be improved by noting that natural hazards pose a risk to essential human health needs including food production and events can disrupt food supply.	Amend statement as follows: <i>An earthquake on the Alpine Fault would cause potentially catastrophic impacts on the entire region. Particular areas in Otago are prone to flooding. A major hazard event could isolate all or parts of Otago for an extended time. <u>Natural hazards pose a risk to essential human health needs including regionally and nationally significant food production and events can disrupt food supply.</u></i>
SRMR-I1 - Natural hazards pose a risk to many Otago communities - Context	Support in Part / Oppose in Part	The context would be improved by noting that natural hazards pose a risk to food production and events can disrupt food supply. Noting historic heritage without noting the risks to essential human health needs is a deficiency in the statement.	<i>The Otago region is exposed to a wide variety of natural hazards that impact on people <u>including essential human health needs of housing, food and water, property, infrastructure, historic heritage and the wider environment...</u></i> <i>Frequent heavy rainstorms, the steep gradients of many river catchments and human occupation of floodplains combine to make flooding the most frequently occurring natural hazard</i>

			<p><i>event in the Otago region. For example, flooding can affect Otago's main urban centres causing damage to housing and business disruption, and a <u>Agriculture and food production and food supply can be disrupted in Otago's floodplains (lower Clutha and Taieri) and elsewhere in heavy rain events.</u></i></p>
<p>SRMR-I1 - Natural hazards pose a risk to many Otago communities - Impact snapshot / Economic</p>	<p>Support in Part / Oppose in Part</p>	<p>The last sentence in this snapshot notes in six words that, in the context of economic effects:</p> <p><i>'Food security can also be affected'</i></p> <p>Food security is not an economic impact. The six words appear as an add on to the statement and fails to address the significance of the resource management issue or reflect the regionally significant value of food production reflected in the FMU visions of 4 of the 5 FMU's that comprise the region.</p>	<p>Amend Impact Snapshot as follows:</p> <p><i>Economic</i></p> <p><i>...For industry, hazards can damage production assets and infrastructure with associated costs, disrupt service delivery and limit availability and access to goods and services, and cause decline in sales and increased costs. Loss or changes in production flows can be either temporary or permanent depending on financial resilience of businesses, which is a function of their existing loan commitments, credit worthiness and insurance cover.</i></p> <p><i><u>Food security production systems can also be affected impacting on the regional economy with immediate effect</u></i></p>

			<u>on jobs and longer-term effects on production value and domestic and export returns.</u>
SRMR-I1 - Natural hazards pose a risk to many Otago communities - Impact snapshot / Social	Support in Part / Oppose in Part	The statement on social impacts is required to address the fact that natural hazards pose a risk to essential human health needs including food production and events can disrupt food supply. Longer term food security may be impacted.	Amend Impact Snapshot as follows: <i>Social</i> <u>... There can be short and long terms impacts on the regional and nationally significant Otago food production system. The food supply chain can be disrupted and the security of an essential human health need compromised.</u>
SRMR-I2 - Climate change is likely to impact our economy and environment - Statement	Support in Part / Oppose in Part	In the context of greenhouse gas emissions reduction targets, the Paris Agreement highlights the importance of food production and food security, recognising the “fundamental priority of safeguarding food security ...” and noting the need to adapt and foster resilience and lower emissions, in a manner that does not threaten food production. Diversification to horticulture presents an opportunity to reduce emissions while increasing food production, as	Amend as follows: SRMR-I2 - Climate change is likely to <u>will</u> impact our economy and environment <i>Statement</i> <i>Otago’s climate is changing, and these changes will continue for the foreseeable future. Central Otago is likely to see more varied precipitation, leading to increased flooding and reduced water reliability. This will be</i>

identified by the Climate Change Commission.

'Ināia tonu nei: a low emissions future for Aotearoa' includes the assumption (in the Demonstration Path) that 2,000 ha of land will be converted to horticulture per year from 2025 and notes that the Commission expect this could increase if "barriers -such as water availability, labour, supply chains and path to market - are addressed".

Opening up more opportunities for conversion to lower emissions production systems and land uses, including horticulture' is listed as a critical outcome.

From HortNZ's perspective it is important to not create barriers to climate change adaptation and/or mitigation and enable long-term climate change adaptation and/or mitigation, though projects such as water storage and provisions which enable growing areas to move between regions.

compounded by stronger winds, increased temperatures and longer dry periods, which may affect the number and types of crops and animals that the land can sustain. Food production systems will need to change to respond to food supply and food security needs.

On the coast, low lying areas like South Dunedin are at risk of inundation from rising sea levels. This will also exacerbate coastal erosion, which could damage coastal infrastructure (including roads), damage historic heritage, particularly wāhi tūpuna, and expose old waste dumps (e.g. at Middle Beach). Climate change will also affect native animals and plants, compounding the impacts of existing pests and stresses and providing opportunities for new pests to establish themselves due to changed conditions.

The impact of other climate change threats is unpredictable. It is important to not create barriers to climate change adaptation and/or mitigation and

			<u>enable long-term climate change adaptation and/or mitigation.</u>
SRMR-I2 - Climate change is likely to impact our economy and environment - Context	Support in Part / Oppose in Part	The context states that the rate of future climate change depends on how fast greenhouse gas concentrations increase. The statement would be improved by also noting that the region has an opportunity to reduce emissions including through land use change.	Amend Context as follows: The rate of future climate change depends on how fast greenhouse gas concentrations increase. <u>The region has a critical role to play to reduce emissions including through land use change.</u>
SRMR-I2 - Climate change is likely to impact our economy and environment - Impact Statement / Economy / Regional Industry	Support in Part / Oppose in Part	Diversification to horticulture presents an opportunity to reduce emissions while increasing food production, as identified by the Climate Change Commission. This will maintain a robust regional economy.	Amend Impact Statement / Economy / Regional Industry as follows: <i>Climate change may also result in shifting land-use activities to adapt to altered climate conditions, which will incur costs, and potentially enable resources previously unviable to come into production.</i> <u>Diversification to horticulture presents an opportunity to reduce emissions and support the transition to a low emissions economy. It is important that decision makers can assess the benefits of land use change.</u> <i>However, these benefits may be limited by negative effects of climate change such as prolonged drought and</i>

			<i>increased flood risk. Some of these impacts can be mitigated by adaptation, for example, planting new crops that are better suited to new climatic conditions or through changes in crop intensification, or water harvesting <u>and storage practices</u>.</i>
SRMR-I3 – Pest species pose an ongoing threat to indigenous biodiversity, economic activities and landscapes	Support in Part / Oppose in Part	Pest species and biosecurity risks also pose a threat to food production and food security.	Amend as follows: SRMR-I3 – Pest species pose an ongoing threat to indigenous biodiversity, <u>food production and food security</u> , economic activities and landscapes
SRMR-I3 – Pest species pose an ongoing threat to indigenous biodiversity, economic activities and landscapes - Statement	Support in Part / Oppose in Part	The statement fails to address the risk pest species pose to food production and food security,	Amend Statement as follows: <i>Pest species can be found throughout Otago, from alpine to marine environments. Rabbits are changing Central Otago’s landscape, eroding soils and affecting agriculture. Wilding conifers threaten high country and tussock grassland, changing the landscape and impacting on recreational, hydrological and conservation values. Aquatic pests and weeds such as didymo, lake snow and lagarosiphon affect our lakes and rivers.</i>

			<p><i>Invasive marine species affect our marine waters. Native aquatic plants are displaced, impacting ecosystem and indigenous biodiversity health and recreation activities.</i></p> <p><u><i>Climate change will compound the impacts of existing pests and providing opportunities for new pests to establish themselves due to changed conditions potentially threatening food production systems and food supply.</i></u></p>
<p>SRMR-13 – Pest species pose an ongoing threat to indigenous biodiversity, economic activities and landscapes - Impact snapshot / Social</p>	<p>Support in Part / Oppose in Part</p>	<p>The social impact snapshot only considers impacts on recreational values and human health problems and fails to consider food production, food supply and food security matters that are also essential to human health needs.</p>	<p>Amend Impact snapshot / Social as follows:</p> <p><i>Recreation values can be impacted through loss of amenity, access or landscape values. Pests can also cause human health problems. For example, some weed pollens can induce asthma and cause allergies (e.g. hay fever). Zoonoses (bacterium, viruses, parasites, prions) can result in diseases being transferred from animals to humans and include, for example, leptospirosis and campylobacter. <u>Pests and biosecurity incursions can affect food production, food supply and food security matters</u></i></p>

			<i>that are also essential to human health needs.</i>
SRMR-14 – Poorly managed urban and residential growth affects productive land, treasured natural assets, infrastructure and community well-being Statement	Support in Part / Oppose in Part	HortNZ supports the statement of the issue that poorly managed urban and residential growth affects productive land. The statement provides examples of how this is occurring in Mosgiel. It is also happening around Cromwell where urban growth is threatening the ability to use productive land for high value horticulture.	Amend SRMR 14 Statement by adding after the sentence regarding Mosgiel: <u>Cromwell's growth is threatening the ability to use productive land for high value horticulture.</u> Include Cromwell in the last sentence: Towns like Arrowtown, Clyde, <u>Cromwell</u> and Milton experience poor air quality in winter, while experiencing pressure to grow.
SRMR-14 – Poorly managed urban and residential growth affects productive land, treasured natural assets, infrastructure and community well-being Context	Support in Part / Oppose in Part	SRMR 14 – Context describes urban areas but does not provide the context for productive land and rural areas.	<u>Add a new paragraph to SRMR14 – Context as follows:</u> <u>The productive land in Otago contributes to the social and economic wellbeing of the community through production of food and other rural production based products. Otago has areas of highly productive land which are particularly valuable for food production. The rural character of the rural area is also an attribute that contributes to the importance of the rural area. However where development occurs in a place or manner that removes or reduces the potential to use productive land, including</u>

			<u>through reverse sensitivity effects, the productive capacity of the land is compromised and not available for the benefit of society.</u>
SRMR-I4 – Poorly managed urban and residential growth affects productive land, treasured natural assets, infrastructure and community well-being Impact snapshot – Environmental	Support in Part / Oppose in Part	SRMR 14 Impacts snapshot – Environmental: The description of the environmental impact includes reference to reverse sensitivity but does not include any reference to highly productive land or productive capacity of land. Water is another resource that can be adversely affected by poorly managed urban growth and development. These resources can be poorly allocated and inefficiently used and unavailable in a sufficient qualitative and quantitative state for food production.	Add to SRMR14 Environmental as second sentence: <u>Urban or rural lifestyle expansion onto highly productive land removes the land resource from production, including the production of food.</u> Identify that water is another resource that can be adversely affected by poorly managed urban growth and development.
SRMR-I4 – Poorly managed urban and residential growth affects productive land, treasured natural assets, infrastructure and community well-being Impact snapshot – Economic	Support	HortNZ supports the identification of loss of productive land as an economic impact arising from poorly managed urban growth and development.	Retain SRMR14 Impact snapshot – Economic Bullet point 1.
SRMR-I4 – Poorly managed urban and residential growth affects productive land, treasured natural assets, infrastructure and community well-being	Support in Part / Oppose in Part	The loss of productive land (either directly though building on it, or indirectly though reverse sensitivity effects) is not just an	Amend SRMR14 Impact Snapshot – Social to include: The loss of productive land (either directly though building on it, or indirectly though

<p>Impact snapshot – Social</p>		<p>economic impact but also a social impact on food production and food security.</p>	<p>reverse sensitivity effects) affects the production of food and food security and hence the health needs of people.</p>
<p>SRMR-I5 – Freshwater demand exceeds capacity in some places - Statement</p>	<p>Support in Part / Oppose in Part</p>	<p>Amend the statement to not that rural land uses are changing to meet food production demands of growing urban populations and will continue to change to respond to climate change.</p>	<p>Amend Statement as follows: <i>In water-short catchments, freshwater availability may not be able to meet competing demands from the health and well-being needs of the environment, the health and well-being needs of people, and the ability of people and communities to provide for their social, economic and cultural well-being. Many of these catchments are also experiencing urban growth, changes in rural land uses to meet food supply demands of growing urban populations and will continue to change to respond to climate change, and increased demand for hydro-electric generation.</i></p>
<p>SRMR-I5 – Freshwater demand exceeds capacity in some places - Context</p>	<p>Support in Part / Oppose in Part</p>	<p>Water is necessary for food production. This is linked to population growth food demand and an essential human health need not an economic use.</p>	<p><i>Population growth, <u>food production</u> and <u>land-use intensification</u> in urban and rural environments can create increased demand for freshwater for human consumption, irrigation and other</i></p>

			<p><i>economic uses. Freshwater resources in some places are reaching, or are beyond, their sustainable abstraction limits. However, there continues to be debate in the community about how historical freshwater allocations can be adjusted to achieve a balance of economic, environmental, social and cultural needs.</i></p>
<p>SRMR-I5 – Freshwater demand exceeds capacity in some places - Impact Snapshot</p>	<p>Support in Part / Oppose in Part</p>	<p>Water is necessary for food production. This is linked to population growth food demand and an essential human health need not an economic use.</p> <p>The social impacts discussion covers freshwater needs in regard to essential urban growth needs. It also covers recreational uses. There is no discussion on water as an essential human health need and its link to food production as another essential human health need. This is addressed in SRM-I6 in the context of water quality but not in terms of demand and how this then must influence allocation decisions.</p> <p>Pursuant to Part 2 Section 5</p>	<p>Amend the impact snapshot to specifically the health and safety issues associated with water demand including drinking, sanitation and food production.</p> <p>Link the impact snapshot to the FMU vision statements seeking outcomes whereby innovative and sustainable land and water management practices support food production and improve resilience to the effects of climate change.</p>

Sustainable management *means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being **and for their health and safety** while–*

In not addressing this relationship the section fails to identify the value of Aotearoa's food production system and Otago's regional value of food production expressed through the vision of four the five Freshwater Management Units:

- Clutha Mata-au FMU
- North Otago FMU
- Taieri FMU
- Catlins FMU

Those vision statements seek outcomes whereby innovative and sustainable land and water management practices support food production and improve resilience to the effects of climate change.

<p>SRMR-16 - Declining water quality has adverse effects on the environment, our communities, and the economy - Context</p>	<p>Support in Part / Oppose in Part</p>	<p>The context usefully identifies that water quality affects a wide range of environmental health factors, human survival needs, and cultural, social, recreational, and economic uses.</p>	<p>Amend Context as follows: <i>...Water quality affects a wide range of environmental health factors, human <u>health and</u> survival needs, and cultural, social, recreational, and economic uses.</i></p>
<p>SRMR-16 - Declining water quality has adverse effects on the environment, our communities, and the economy - Impact Snapshot</p>	<p>Support in Part / Oppose in Part</p>	<p>Water is necessary for food production. This is linked to population growth food demand and an essential human health need not an economic use.</p> <p>The social impacts discussion covers freshwater needs in regard to essential urban growth needs. It also covers recreational uses. There is no discussion on water as an essential human health need and its link to food production as another essential human health need. This is addressed in SRM-16 in the context of water quality but not in terms of demand and how this then must influence allocation decisions.</p> <p>Pursuant to Part 2 Section 5 Sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which</p>	<p>Amend the impact snapshot to specifically the health and safety issues associated with water quality including drinking, sanitation, and food production.</p> <p>Link the impact snapshot to the FMU vision statements seeking outcomes whereby innovative and sustainable land and water management practices support food production and improve resilience to the effects of climate change.</p>

enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while–

In not addressing this relationship the section fails to identify the value of Aotearoa's food production system and Otago's regional value of food production expressed through the vision of four the five Freshwater Management Units:

- Clutha Mata-au FMU
- North Otago FMU
- Taieri FMU
- Catlins FMU

Those vision statements seek outcomes whereby innovative and sustainable land and water management practices support food production and improve resilience to the effects of climate change.

Declining water quality in terms of effects on food production and food security has a direct effect on human

		health and not an indirect effects as stated in the impact snapshot on economics.	
SRMR-I6 - Declining water quality has adverse effects on the environment, our communities, and the economy - Impact Snapshot / Economic	Support in Part / Oppose in Part	Identify that water pollution can impact on the food production needs of clean water for irrigation and processing. The discussion elevates other matters above essential human health needs i.e. property values and recreation.	Amend Economic as follows: <i>Water pollution (from nutrients, chemicals, pathogens and sediment) can have far-reaching effects potentially impacting <u>food production</u>, tourism, property values, commercial fishing, recreational businesses, and many other sectors that depend on clean water.</i>
SRMR-I7 - Rich and varied biodiversity has been lost or degraded due to human activities and the presence of pests and predators	Support in Part / Oppose in Part	The issue statement addresses issues associated with pests and predators on biodiversity but fails to sufficiently address issues associated with pests on biosecurity and risks to the regional food production system, food supply and food security. Oddly there is a comment in the impact snapshot on economics as follows: <i>"The economic costs of lost productivity due to pests, erosion and damage to land, are likely to be significant and</i>	Add new issue statement for Food Production, Food Security and Food Supply that includes consideration of biosecurity matters.

		<p><i>there is potential for loss of biodiversity to adversely impact on the economy."</i></p> <p>This is the only statement that provides any link to effects of pests on productivity and is disjointed from the remainder of the issue statement.</p>	
SRMR-18 - Otago's coast is a rich natural, cultural and economic resource that is under threat from a range of terrestrial and marine activities	Support in Part / Oppose in Part	The corresponding s32 assessment (para 285) refers to food production and other farming activities, rather than food production industries. HortNZ supports the language used in the s32 and seeks that this is brought through to the provision.	<p>Amend SRMR-18 as follows:</p> <p><i>Otago's coast is a rich natural, cultural and economic resource that is under threat from a range of terrestrial and marine activities, the context identifies that the activities occurring within or affecting the coastal environment include land and marine based (e.g aquaculture) <u>food production and other farming industries</u>.</i></p>
SRMR-18 - Otago's coast is a rich natural, cultural and economic resource that is under threat from a range of terrestrial and marine activities - Context	Support in Part / Oppose in Part	The context identifies that the activities occurring within or affecting the coastal environment include land and marine based (e.g aquaculture) food production industries. Furthermore, the context describes that such activities can be important contributors to the existing and future health and well-being of communities when they are located and	Retain reference in Context that activities occurring within or affecting the coastal environment include land and marine based (e.g., aquaculture) food production industries.

		<p>managed appropriately. A number of these activities provide a significant contribution to the regional economy.</p> <p>While supporting the statement in SRMR-I8 the statement highlights the gap that exists in other issues statements in regard to food production and the need for a separate issue statement on food production, food supply and food security.</p>	
<p>SRMR-I10 - Economic and domestic activities in Otago use natural resources but do not always properly account for the environmental stresses or the future impacts they cause</p>	<p>Oppose in part</p>	<p>It is unclear what 'domestic activities' refers to in SRMS-I10. No clarity is provided in the supporting discussion.</p> <p>What is meant by 'properly account for'? Is this referring to the failure of the existing planning framework in Otago?</p> <p>In reading the context discussion, all environmental stresses appear to be as a result of economic activities, which is an unfair statement. The need for PC7 and PC8 to the Otago Water Plan, and the rushed proposed Otago RPS are clear demonstrations of this.</p> <p>Given the existing planning system in Otago has failed to appropriately manage the natural and physical resources, then this provision should be</p>	<p>Delete the issue statement and replace with the following:</p> <p><u>SRMR-I10 - The planning framework in Otago has failed to manage and protect Otago's natural and physical resources, resulting in environmental stresses and unknown future impacts.</u></p>

		address it transparently. Otherwise, the same mistakes could be made again in the future.	
SRMR-I11 - Cumulative impacts and resilience - the environmental costs of our activities in Otago are adding up with tipping points potentially being reached - Statement	Support in Part / Oppose in Part	<p>Support an issue statement on cumulative impacts and resilience. That statement should note the need for essential human health.</p> <p>'Threshold' is used in the IM - integrated management policies. For consistency it would be best if the term 'tipping point' be replaced with 'threshold' throughout the issue statement and supporting discussion.</p> <p>Also, the first line '<i>How and where we currently live is likely to change significantly in coming years</i>' is unlikely to happen in the 10-year life of the pRPS. A longer-term view should be taken. This is also not accurate across the region. Only those areas subject to extreme natural hazard risk are likely to change where they live.</p>	<p>Amend Statement as follows:</p> <p><i>How and/or where we currently live is likely to change significantly in coming years. To respond to all the issues identified in this RPS, it is essential to consider changes to how we travel, the industries our economy relies on, the use we currently make of the natural and physical resources of the region, and how we provide for <u>essential human health</u>, personal and community well-being, all while protecting our natural environment.</i></p>

<p>SRMR-I11 - Cumulative impacts and resilience - the environmental costs of our activities in Otago are adding up with tipping points potentially being reached - Context</p>	<p>Support in Part / Oppose in Part</p>	<p>Support context on cumulative impacts and resilience. That context should note the need for essential human health.</p> <p>'Threshold' is used in the IM - Integrated management policies. For consistency it would be best if the term 'tipping point' be replaced with 'threshold' throughout the issue statement and supporting discussion.</p>	<p>Amend Context as follows:</p> <p><i>The long term environmental, economic, and social well-being of the Otago region and the health and safety of people and communities requires anticipating and minimising cumulative environmental impacts before they reach a tipping point threshold, beyond which systems can no longer properly function.</i></p>
<p>SRMR-IX</p>	<p>New</p>	<p>Add new issue statement for Food Production, Food Supply and Food Security.</p>	<p>Add new Significant Resource Management Issue as follows:</p> <p><u>SRME-IX Food production systems are coming under increased pressure from population growth, competing resource use, climate change, and the need to improve environmental outcomes.</u></p> <p><u>Statement</u></p> <p><i>The production of fruit and vegetables in Otago operates as part of a national system that produces healthy food to support the essential health needs of</i></p>

people and provides jobs and export earnings which support the social, economic, and cultural wellbeing of our population. Those systems are under increased pressure from population growth to produce and supply food and to maintain food security. Competing demands are reducing the availability of land for primary production (particularly highly productive land), including reverse sensitivity impacts on primary production, and freshwater resources needed to produce and process food.

Context

Otago has nationally recognised and regionally significant food production systems critical for the essential human health of current and future generations.

Currently the highest concentrations of growers are in the Central Otago and Waitaki Districts. However, there are growers located outside these areas.

The combination of soil and climate (including high diurnal range) means

that Central Otago is especially suited to growing high quality crops. Central Otago is one of the main commercial growing areas in New Zealand for stonefruit. Whereas, in the Waitaki District area, a wide variety of fruit and vegetable crops are grown.

The production of fruit and vegetables (both outdoor growing and covered crops) in New Zealand operates as part of a national system, The regions supply markets at different times of the year; a sustainable, year-round supply of produce for New Zealand is only possible if the different growing regions work in conjunction to ensure that seasonality and other variables, such as diseases and weather, do not interrupt that supply.

Food security is a nationally important issue which needs to be addressed at a strategic level. While New Zealand is a net food exporter, many of the vegetables and some of the fruit that we grow are only for domestic food supply.

Diversification to horticulture presents an opportunity to reduce emissions while increasing food production. The transition to developing indoor growing and outdoor food systems that have lesser emissions, will require an integrated approach, that include behaviour change, investment in research, infrastructure, and technology as well as regulatory signals. However, they require significant investment and as such regulatory certainty, particularly with respect to matters such as water access.

Impact snapshot

Environmental

People are part of the natural environment, and the social, economic, and cultural wellbeing of all people must be provided for within natural environmental limits.

For future generations, it is critical that Highly Productive Land (HPL) is protected from the continual trend of

cumulative loss and loss of productive capacity due to reverse sensitivity and competition for natural resources. Any protection of HPL from inappropriate subdivision, must also recognise its value for current and future generations for food production and enable its use for food production.

There needs to be flexibility to develop highly productive land in some places. What is important, is that urban development and productive land are considered together to provide a planned approach so new urban areas are designed in a manner that maintains the overall productive capacity of highly productive land.

In the context of greenhouse gas emissions reduction targets, the Paris Agreement highlights the importance of food production and food security, recognising the “fundamental priority of safeguarding food security ...” and noting the need to adapt and foster resilience and lower emissions, in a

manner that does not threaten food production.

'Ināia tonu nei: a low emissions future for Aotearoa' includes the assumption (in the Demonstration Path) that 2,000 ha of land will be converted to horticulture per year from 2025 and notes that the Commission expect this could increase if "barriers - such as water availability, labour, supply chains and path to market - are addressed".

Opening up more opportunities for conversion to lower emissions production systems and land uses, including horticulture' is listed as a critical outcome.

The advice also notes that further land use change from livestock agriculture into horticulture and forestry (from 2021, additional 3,500 ha per year converted from dairy) would be required to meet the more ambitious end of the 2050 methane target if new technology does not come through.

It is important to not create barriers to climate change adaptation and/or mitigation and enable long-term climate change adaptation and/or mitigation, though projects such as water storage and provisions which enable growing areas to move between regions. Climate change will also compound the impacts of existing pests and provide opportunities for new pests to establish themselves due to changed conditions potentially threatening food production systems and food supply.

The regional value of food production is expressed through the vision of four the five Freshwater Management Units:

- Clutha Mata-au FMU
- North Otago FMU
- Taieri FMU
- Catlins FMU

Water is necessary for food production. This is linked to population growth food demand and an essential human health.

Economic

For most vegetable crops, the domestic market is the primary market, but many growers produce export crops within their rotations for practical (soil health) and economic reasons. For example, onions which are predominately grown for export are grown with other vegetables crops in rotation. Onions grown in rotation with non-alliaceae crops promote soil health. Export income provides greater economic resilience.

We need to ensure economic and environmental sustainability of primary production are taken into account when protecting HPL. Otherwise, we risk stranded assets being sold off as poorly performing lifestyle blocks.

Social

It is not just the economic benefits associated with primary 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.

New Zealand also has an important role in exporting fresh vegetables to the Pacific Islands. For example, in 2016 76% of total exported potatoes went to Fiji, 87% of exported Kumara and 82% of exported cauliflower, 75% of exported cabbage went to the Pacific Islands. NZ has an important role in the food security of Pacific Islands. New Zealand and our Pacific Island neighbours are too remote to import many fresh vegetables from elsewhere in the world. Most vegetables that New Zealand imports are processed.

While some fruit crops grown in New Zealand have a predominately export focus. Many fruit crops are grown mainly for the domestic supply.

Ministry of Health data indicates that only 33.5% of adults and 44.1% of

children are meeting fruit and vegetable intake guidelines.

Despite, on the whole, New Zealand producing more food than we can consume (noting this is not true of all crops), many New Zealanders live in food insecurity. A 2019 Ministry of Health study analysed household food insecurity among children in New Zealand, it estimated that 174,000 (19%) of all children in New Zealand live in food-insecure households.

There is an extensive body of research indicating that children experiencing household food insecurity have lower fruit and vegetable intake, diets higher in fat, and are at an increased risk of obesity.

In New Zealand, for families living in deprived areas, increases in fruit and vegetable prices, especially around their off-season, compel them to substitute the purchase of healthier whole fruit and vegetables with cheap energy-dense and nutrient-poor products.

Just as maintaining our environmental brand is of value to our high value export products, so too is ensuring that all New Zealanders have access to the healthy food, that we built our export reputation on.

There are complex social and economic reasons that people struggle to meet their nutritional needs. Growers are passionate about providing healthy produce; however, it is still a business and for them to continue to grow the healthy food we rely on, it has to be economically viable.

Regulatory pressure is preventing the expansion of vegetable growing from keeping up with population growth. This is predicted to result in increased cost for consumers, with tangible health consequences.

IM - Integrated Management

IM-03 - Environmentally sustainable impact	Support in Part / Oppose in Part	<p>We have concerns with the language used in this objective and the unknown consequences for implementation.</p> <p>The objective as drafted is inconsistent with s5 of the RMA and it will be difficult for lower order planning documents to give effect this objective and the RMA.</p> <p>The s32 assessment provides no discussion of the purpose of IM-03, other than listing it as a reason for the supporting policies. In the absence of a discussion on the purpose we cannot provide alternative drafting and therefore recommend it is deleted.</p>	Delete policy or redraft to be consistent with the purpose of the RMA.
IM-P1 - Integrated approach	Support in Part / Oppose in Part	This policy as drafted creates confusion as the terminology is not consistent with other proposed provisions.	<p>Amend as follows:</p> <p>IM-P1 -Integrated approach</p> <p>The objectives and policies in this RPS form an integrated package, in which:</p> <p>(1) all activities are carried out within the environmental constraints<u>limits and thresholds</u> of this RPS,</p> <p>(2) all provisions relevant to an issue or decision must be considered,</p> <p>(3) if multiple provisions are relevant, they must be considered together and</p>

			<p>applied according to the terms in which they are expressed, and</p> <p>(4) notwithstanding the above, all provisions must be interpreted and applied achieve the integrated management objectives IM-O1 to IM-O4.</p>
<p>IM-P2 - Decision Priorities</p>	<p>Support in Part / Oppose in Part</p>	<p>The s32 assessment states</p> <p><i>If tensions arise between provisions in other domains or topics, IM-P2 provides a pathway for resolving them. This approach is based on the management hierarchy laid out in the NPSFM2020, reflecting the fundamental importance of environmental health, considering first the long-term life-supporting capacity of the environment, second people’s health, and third other facets of wellbeing. (para 218)</i></p> <p>However, the policy as drafted goes much further than this intension. It goes further than the NPSFM2020 which in Objective 1 puts the <i>health and well-being of water bodies and freshwater ecosystems as the first priority</i>, not the</p>	<p>Delete policy or amend to provide for relief sought.</p>

		<p>long-term life-supporting capacity and mauri of the natural environment.</p> <p>Furthermore, as the proposed RPS does not contain rules, decisions are not triggered by the RPS. It is therefore inappropriate to include '<i>decision making under the RPS shall</i>' in the policy.</p> <p>The policy as drafted ignores the physical environment which is also integral to sustainable management (section 5(1) of the RMA). The policy is therefore inconsistent with both the NPSFM 2020 and the sustainable management purpose of the RMA.</p>	
IM-P10 - Climate change adaptation and mitigation	Support	<p>Support policy that requires Otago to identify and implement climate change adaptation and mitigation methods for Otago.</p> <p>The policy supports land use change to horticultural use.</p>	Retain as proposed.
IM-P11 - Enhancing environmental resilience to effects of climate change	Support	Support policy that seeks to enhance environmental resilience to the adverse effects of climate change by facilitating	Retain as proposed.

		<p>activities that reduce human impacts on the environment.</p> <p>The policy supports land use change to horticultural use.</p>	
IM-M1 – Regional and district plans	Support	<p>Support a method that directs regional and district plans to provide for activities that seek to mitigate or adapt to the effects of climate change or reduce greenhouse gas emissions,</p> <p>This must be implemented to support landuse change to horticulture.</p>	Retain as proposed.
IM-M4 – Climate change response	Support in Part	<p>The method would be improved by explicit reference to the need to work together and consult with food producers.</p>	<p>Amend IM-M4 as follows:</p> <p>By January 2027, local authorities (led by Otago Regional Council) must together, in partnership with Kāi Tahu and in consultation with Otago’s communities <u>and food producers</u>, develop climate change responses for the region that achieve climate change adaptation and mitigation, and that include:</p> <p>(1) identifying natural and built resources vital to environmental and</p>

			community resilience, <u>essential human health and well-being,</u>
IM-PR1-Principal reasons	Support in Part / Oppose in Part	The wording such as 'enshrine' is inappropriate for an RPS.	Amend as follows: The provisions seek to enshrine an explicit recognition and implementation of these facets into plan making and resource consenting processes. They set an expectation of integrated resource management that flows through to all other provisions of the RPS, and informs the limits and thresholds we set on human activities for protecting environmental health. It sets explicit expectations that local authorities will work with each other and with other agencies to ensure management approaches are clear, coordinated, and able to support Otago's communities into the future. <u>This applies to plan making and resource consenting processes.</u>
PART 3 - DOMAINS AND TOPICS			
DOMAINS			
AIR - Air			

AIR-O2 Discharges to air	Support in part	Objective AIR-O1 relates to ambient air quality. Objective AIR-O2 relates to discharges to air and localised effects on air quality. It should be clear that AIR-O2 to localised effects on air quality and provide a framework for such discharges to occur.	Amend AIR-O2: Localised effects of discharges to air Provide for the discharges of contaminants into air where there are no significant localised adverse effects on human health, amenity and mana whenua values and the life supporting capacity of ecosystems.
AIR-P3 Providing for discharges to air	Support in part	The policy specifically allows discharges to air. This is supported.	Retain AIR-P3.
AIR-P4 Avoiding certain discharges	Oppose in part	The policy uses the terms 'offensive, objectionable, noxious or dangerous effects' but these are not defined terms in the pRPS. The s32 (271) states that criteria to define these terms should be left to the review of the Air Plan. This approach is not supported as it means that there is a lack of clarity in the direction of the pRPS and uncertainty for users. Given that the policy direction is 'avoid' there must be certainty about what is intended. Or alternatively delete the policy in the pRPS and address the issue in the Air Plan review to achieve the outcomes sought in the pRPS.	Either define or describe 'offensive, objectionable, noxious or dangerous effects' or delete AIR-P4.
AIR-P5 Managing certain discharges	Support in part	HortNZ supports the provisions for providing for certain discharges that occur within a rural setting such as agrichemical spraying. However, the	<u>Amend AIR-P5 as follows:</u> <u>2) agrichemical and fertiliser spraying applications</u>

		<p>wording should refer to primary production activities, rather than farming.</p> <p>Fertiliser and agrichemical applications are not necessarily undertaken as 'sprays' so the terminology should be amended.</p>	3) <u>farming primary production activities</u>
AIR-P6 Impacts on mana whenua values	Oppose	<p>Mana whenua values are included in Air O1, AIR-O2, AIR-P3 so if is not necessary to include a specific policy for mana whenua values.</p>	Delete AIR-P6.
AIR-P7 Sensitive activities	New provision	<p>There needs to be clear direction in the pRPS that the location of activities is an important consideration in terms of likely adverse effects on people from discharges to air. New sensitive activities locating in proximity to existing consented or permitted discharges to air is likely to lead to reverse sensitivity effects.</p> <p>This is particularly relevant to consider when identifying new locations for urban growth and the appropriateness of the location of sensitive activities.</p>	<p>Include a new policy AIR-P7 Sensitive activities</p> <p><u>Avoid locating new sensitive activities near existing activities which are permitted or consented to discharge to air.</u></p>
AIR-M2 Regional plans	Support in part	<p>HortNZ supports the need to prepare a regional air plan as the operative plan is well out of date. However, there are concerns about the directive to avoid 'offensive, objectionable, noxious or dangerous discharges to air without</p>	<p>Amend AIR-M2 by:</p> <p>Deleting 1)</p> <p>Amend 5) by deleting 'any subsequent amendments or updates'.</p>

		certainty as to how the terms will be applied. It is also unclear what may be included in 'any subsequent amendments or updates' of the Air Quality Strategy for Otago so the provision does not provide certainty.	
AIR-M3 Territorial authorities	Support in part	AIR-M3 requires territorial authorities to amend district plans to direct urban form that assists in achieving good air quality including by managing spatial distribution of activities. HortNZ supports consideration of air quality in spatial planning but seeks specific consideration of spatial separation of urban development from existing activities that are consented or permitted to discharge to air to ensure that reverse sensitivity effects do not occur.	Amend AIR-M3 by adding: 3) Ensure that there is spatial separation between location of new sensitive activities and existing activities that are consented or permitted to discharge contaminants to air.
AIR-M5 Incentives and other mechanisms	Support in part	AIR-M5 sets out a range of mechanism that can be used to achieve the air quality objectives. There are Codes of Practice and NZ Standards which assist with achieving the objectives and these should be specified as appropriate mechanisms to use. NZS8409:2021 Management of Agrichemicals is one such NZ Standard that sets out best practice for agrichemical use to assist in managing effects of discharges beyond the boundary.	Amend AIR-M5 by adding: 7) NZ Standards and Codes of Practice that include methods that support achieving the air quality objectives.

AIR-E1 - Explanation	Support in part	The Explanation should include reference to the territorial authorities including spatial distribution and separation in district plan provisions for urban development.	Amend AIR-E1 by adding the following: Territorial authorities will include provisions in district plans for spatial distribution and separation in district plan provisions for urban development.
AIR-AER-2	Support in part	AIR-AER2 seeks that Otago has an urban form that takes into account the effects of activities and any discharges to air they create. However, the AER does not anticipate separation of activities to ensure that reverse sensitivity effects do not occur.	Amend AIR-AER2: Otago has an urban form that takes into account the effects of activities, including potential reverse sensitivity effects in the spatial distribution and separation of sensitive activities from activities that discharge to air.
CE - Coastal Environment			
CE-PR1 - Principal reasons	Support in Part / Oppose in Part	As a regionally and nationally significant resource management issue, the importance of food production activities in the coastal environment could be better expressed through the proposed Coastal Environment policies.	Amend the principal reasons for the Coastal Environment as follows: <i>A number of activities occur within or affect the coastal environment including urban development, recreational activities, transport infrastructure, port activities, infrastructure, energy generation and transmission, <u>food production</u> and other farming activities, plantation forestry, rural industry and mineral extraction. These activities can be important contributors to the existing and future health and well-being of communities. However, poorly</i>

			<i>located or managed activities can have adverse effects that compromise the values of the coastal environment such as natural character, biophysical processes, water quality, surf breaks, indigenous biodiversity and natural landscapes.</i>
CE-P2-Identification	Support in Part / Oppose in Part	As a regionally and nationally significant resource management issue, the importance of food production activities in the coastal environment could be better expressed through the proposed Coastal Environment policies.	Amend CE-P2 to include the additional matter under clause (1) as follows: ... <u>(j) food production and other farming activities</u>
CE-P9 - Activities on <i>land</i> within the coastal environment	Support in Part / Oppose in Part	As a regionally and nationally significant resource management issue, the importance of food production activities in the coastal environment could be better expressed through the proposed Coastal Environment policies.	Amend CE-P9 to include the additional matter as follows: <u>(6) recognising the importance of food production activities to the health and social, economic and cultural well-being of people and communities.</u> (Noting that there is a typo in the numbering of the notified policy)
LF - Land and Freshwater			

LF-WAI-P1 - Prioritisation	Support	<p>The hierarchy of obligations in Te Mana o te Wai defines three priorities:</p> <p>First, the health and well-being of water bodies and freshwater ecosystems. Within this priority there is no discretion in the interpretation. The priority is clear.</p> <p>The second priority is the health needs of people. Here some discretion in interpretation or the ability to further define Te Mana o te Wai is provided. The NPSFM-2020 states this includes uses <i>such as</i> drinking water.</p> <p>The ORPS extends the second priority to also address the wellbeing of people i.e. beyond health. It also proposes to include interacting with water through ingestion (such as drinking water and consuming harvested resources) and immersive activities (such as harvesting resources and bathing),</p> <p>The reference to the health needs of people is important. It aligns with the purpose of the RMA sustainable management <i>means managing the use,</i></p>	Retain as notified
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*development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being **and for their health and safety** while–*

Essential human health should be defined in the ORPA and means the physiological needs of humans, it includes safe drinking water and sanitation, nutritious food, adequate shelter and warmth.

The regional value of food production is expressed through the vision of four the five Freshwater Management Units:

- Clutha Mata-au FMU
- North Otago FMU
- Taieri FMU
- Catlins FMU

Food to meet the health needs of people cannot be grown without water and sits within the second priority of Ter Man o te Wai.

		<p>The third priority in the hierarchy of obligations in Te Mana o te Wai is the ability of people and communities to provide for their social, economic, and cultural wellbeing now and in the future. Again, there is no discretion in the interpretation. The priority is clear. As per the purpose of the RMA, the health needs of people and communities is a separate but parallel consideration to social, economic and cultural well-being matters. While food production, food supply and food security matters sit within the third priority, clearly the relationship of food production and water to the health needs of people places the values within the second priority.</p>	
<p>LF-WAI-P3 - Integrated management/ki uta ki tai</p>	<p>Support in part</p>	<p>Policy 3 sets out a need to manage the use of fresh water and land in accordance with tikaka and kawa, using an integrated approach that:</p> <p><i>(6) has regard to foreseeable climate change risks, and</i></p>	<p>Amend LF-WAI-P3 as follows:</p> <p>Manage the use of fresh water and land in accordance with tikaka and kawa, using an integrated approach that:</p>

		The policy and ORPS would be improved by stating that having regard to foreseeable climate change risks should also include reducing emissions. This aligns and reinforces IM-P9 - Community response to climate change impacts: By 2030 Otago's communities have established responses for adapting to the impacts of climate change, are adjusting their lifestyles to follow them, and are reducing their greenhouse gas emissions to achieve net-zero carbon emissions by 2050.	(6) has regard to foreseeable climate change risks <u>and reducing emissions, and</u>
LF-VM-O2 - Clutha Mata-au FMU vision	Support in part	Support a vision and objective that in the Dunstan, Manuherekia and Roxburgh rohe of the Clutha Mata-au FMU, innovative and sustainable land and water management practices support food production in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact.	Retain vision and objective and include food production and related elements of food supply and food security as a Significant Resource management Issue for the region.
LF-VM-O3 - North Otago FMU vision	Support in part	Support a vision and objective that by 2050 in the North Otago FMU: innovative and sustainable land and water management practices support food production in the area and improve	Amend LF-VM-O3 as follows: <i>(6) innovative and sustainable land and water management practices support food production in the area <u>that reduce</u></i>

		resilience to the effects of climate change.	<i>emissions and improve resilience to the effects of climate change.</i>
LF-VM-O4 - Taieri FMU vision	Support in part	Support a vision and objective that by 2050 in the Taieri FMU, innovative and sustainable land and water management practices support food production in the area and improve resilience to the effects of climate change.	Amend LF-VM-O4 as follows: (8) innovative and sustainable land and water management practices support food production in the area <u>that reduce emissions</u> and improve resilience to the effects of climate change.
LF-VM-O6 -Catlins FMU vision	Support	Support a vision and objective that by 2030 in the Catlins FMU healthy, clear and clean water supports opportunities for recreation and sustainable food production for future generations.	Retain LF-VM-O4 (6) as notified.
LF-VM-M3 - Community involvement	Support	Support Otago Regional Council working with communities to achieve the objectives and policies in this chapter, including by supporting industry-led guidelines, codes of practice and environmental accords where these would contribute to achieving the objectives of this RPS.	Retain LF-VM-M3(4) as notified.

LF-FW-O8 -Fresh water	Support in part	Support an objective that in Otago's water bodies and their catchments: the health of the wai supports the health of the people and thriving mahika kai. We note this is different to LF-WAI-P1 - Prioritisation where the ORPS has extended priority 2 to the well-being needs of people. The Objective should be consistent.	Amend LF-FM-O8 as follows: (1) the health of the wai supports the health <u>and well-being needs</u> of the people and thriving mahika kai
LF-FW-O8 -Fresh water	Oppose	Oppose the objective that in Otago's water bodies and their catchments: water flow is continuous throughout the whole system. This is not hydrologically possible or representative of a natural hydrological system that will be comprised of a range of waterbodies functioning as ephemeral, intermittent and permanent features.	Delete LF-FW-O8 (2)
LF-FW-P7 - Fresh water	Oppose	Oppose broad objective that states that in terms of Environmental outcomes, attribute states (including target attribute states) and limits ensure that: drinking water are safe for human consumption.	Delete LF-FW-P7

The NPSM-2020 Appendix 1B Other Values That Must Be Considered states as follows:

Drinking water supply

The FMU or part of the FMU can meet people's drinking water needs. Water quality and quantity is sufficient for water to be taken and used for drinking water supply.

Matters affecting the suitability of water for drinking include:

- a) physical, chemical, and microbiological contamination (for example, bacteria and cyanotoxins, viruses, protozoa and other pathogens)
- b) any other contaminants identified in drinking water standards issued under the Health Act 1956 or any other legislation
- c) the effects of contamination on drinking water treatment processes and the safety of

		<p>drinking water, and its aesthetic value (that is, appearance, taste, and smell).</p> <p>The determination on drinking water needs is a contextual determination i.e., ground or surface water supply, from a tap on a reticulated municipal supply, a direct private take from a stream, from a private bore.</p> <p>Requiring all freshwater bodies to achieve Environmental outcomes, attribute states (including target attribute states) and limits that achieve drinking water safe for human consumption is unachievable and unnecessary for the health and well-being of water bodies and freshwater ecosystems.</p>	
<p>LF-FW-M6 -Regional plans</p>	<p>Support in Part / Oppose in Part</p>	<p>LF-FW-M6 -Regional plans states that Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and, after it is made operative, maintain that regional plan to:</p>	<p>Amend LF-FW-M6 - Regional plans as follows:</p> <p><i>(4) include environmental flow and level regimes for water bodies (including groundwater) that give effect to Te Mana o te Wai and provide for:</i></p>

		<p>(4) include environmental flow and level regimes for water bodies (including groundwater) that give effect to Te Mana o te Wai and provide for a range of uses and needs.</p> <p>Excluded from the method is the need to provision water for food production and food security. Notably the provision of rootstock survival water and frost protection water is a mechanism provided in most regional plans to ensure continuity of food production, food supply and food security.</p>	<p><i>a. the behaviours of the water body including a base flow or level that provides for variability,</i></p> <p><i>b. healthy and resilient mahika kai,</i></p> <p><i>c. the needs of indigenous fauna, including taoka species, and aquatic species associated with the water body</i></p> <p><i>d. the hydrological connection with other water bodies, estuaries and coastal margins,</i></p> <p><i>e. the traditional and contemporary relationship of Kāi Tahu to the water body, and</i></p> <p><i>f. community drinking water supplies,</i></p> <p><i>g. <u>Rootstock survival and frost protection water required for domestic food security, and</u></i></p>
<p>LF-FW-M6 -Regional plans</p>	<p>Support in Part / Oppose in Part</p>	<p>LF-FW-M6 -Regional plans states that Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and, after it is made operative, maintain that regional plan to</p> <p>(5) include limits on resource use that:</p>	<p><i>Amend LF-FW-M6 - Regional plans as follows:</i></p> <p><i>(5) include limits on resource use that:</i></p> <p><i>a. differentiate between types of uses, including <u>human health needs (such as drinking water), and social, cultural and</u></i></p>

		<p><i>a. differentiate between types of uses, including drinking water, and social, cultural and economic uses, in order to provide long-term certainty in relation to those uses of available water,</i></p> <p>The method would be improved to identify health and wellbeing needs of people (priority 2) as per LF-WAI-P1 - Prioritisation are uses to be differentiated.</p>	<p><i>economic uses, in order to provide long-term certainty in relation to those uses of available water,</i></p>
LF-FW-M6 -Regional plans	Support in Part / Oppose in Part	<p>LF-FW-M6 -Regional plans states that Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and, after it is made operative, maintain that regional plan to</p> <p><i>(6) provide for the off-stream storage of surface water where storage will:</i></p> <p><i>a. support Te Mana o te Wai,</i></p> <p><i>b. give effect to the objectives and policies of the LF chapter of this RPS, and</i></p>	Provide method for the provision for the on-stream storage of surface water

		<p><i>c. not prevent a surface water body from achieving identified environmental outcomes and remaining within any limits on resource use, and</i></p> <p>The submitter supports the method while noting that the opportunity for on-stream storage of surface water should not be foreclosed and may be a viable method to achieve outcomes.</p>	
LF-FW-AER7	Oppose	<p>LF-FW-AER7 sets down an Anticipated Environmental Result that</p> <p><i>Water in Otago’s aquifers is suitable for human consumption, unless that water is naturally unsuitable for consumption.</i></p> <p>The determination on drinking water needs is a context. Requiring all water in Otago’s aquifers is suitable for human consumption, unless that water is naturally unsuitable for consumption is unachievable and unnecessary for the health and well-being of water bodies and freshwater ecosystems.</p>	Delete LF-FW-AER7

LF-LS - Land and Soil			
LF-LS-O11 Land and Soil	Support	<p>HortNZ supports the safeguarding of the life supporting capacity of soils and the availability and productive capacity of highly productive land for primary production.</p> <p>However, it is noted that a definition is sought for highly productive land to provide clarity as to the land that will be included as highly productive.</p>	<p>Retain LF-LS-O11</p> <p>Include a definition for highly productive land as sought under Interpretation section of this submission.</p>
LF-LS-O12 Use of land	Support	HortNZ supports the objective to maintain soil quality and its contribution to achieving environmental outcomes for fresh water.	Retain LF-LS-O12.
LF-LS-P16 Integrated management	Support	The interconnections between soil, vegetation and water quality and quantity are important.	Retain LF-LS-P16
LF-LS- P17 Soil values	Support	Soil is a critical component of production systems.	Retain LF-LS-P17
LF-LS- P18 Soil erosion	Support	HortNZ supports the approach to implement management practices to minimise potential for loss of soil to water bodies. HortNZ has developed Erosion and sediment guidelines for	Retain LF-LS- P18

		vegetable production to assist with such management practices.	
LF-LS -P19 Highly productive land	Support	<p>HortNZ supports maintaining the availability and productive capacity of highly productive land. The policy sets out a number of criteria for the identification of highly productive land but is dependent on the development of the regional land and water plan by December 2023 to implement the policy.</p> <p>Highly productive land is already under pressure from urban and rural residential development and there should be direction in the pRPS that enables the maintenance of highly productive land in the interim.</p> <p>The criteria in LF-LS-P19 are based on the criteria in Appendix A of the pNPS-HPL for identifying highly productive land.</p> <p>The pNPS-HPL also required regional councils to identify highly productive land in their regional policy statement.</p> <p>LS-LF-P19 would not fulfil such a requirement as the identification is to occur through the regional plan.</p> <p>Therefore, it is important to include a default definition of highly productive land to ensure that until such identification and mapping occurs HPL</p>	<p>Retain LF-LS -P19 but add <u>UFD-O4</u> to LF-LS -P19 3)</p> <p>Include a definition for highly productive land as follows:</p> <p>a) <u>Land that has been identified as highly productive land using LF-LS-P19; OR</u></p> <p><u>Where identification has not occurred as in a), land in the rural area that is classified as LUC1,2 or 3 as mapped by the NZ Land Resource Inventory or by more detailed site mapping.</u></p>

		<p>can be identified and such land protected from development.</p> <p>The pNPS-HPL included a definition that provided for identification of HPL or a default where such a process had not been undertaken. A similar approach is sought for the pRPS.</p> <p>LF-LS -P19 3) refers to UFD-P4, P7 and P8 for managing urban development in rural areas. Reference should also be made to UFD-O4 Development in rural areas as this establishes the framework for the policies.</p>	
LF-LS-P21 Land use and fresh water	Oppose in part	<p>Clause (1) of the policy assumes that reduction of contaminants is required in every instance while the top line of the policy specifies improvement or maintenance.</p>	<p>Amend policy LF-LS-P21 as follows:</p> <p>...</p> <p>(1) <u>Where improvement is required, reduce</u> reducing direct and indirect discharges of contaminants to water from the use and development of land, and</p> <p>(2) ...</p>
LF-LS-M11 - Regional plans	Support	<p>Support a method that requires Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and then, when</p>	<p>Retain as proposed.</p>

		<p>it is made operative, maintain that regional plan to:</p> <p><i>(2) provide for changes in land use that improve the sustainable and efficient allocation and use of fresh water.</i></p> <p>This will provide for land use change to horticulture.</p>	
LF-LS-M12 District plans	Oppose in part	Method 12 does not include a requirement for territorial authorities to identify highly productive land in district plans and avoid urban or rural residential development on such land. This is an important part of achieving LF-LS-P19.	Amend LF-LS-M12 by adding: 4) Include identified highly productive land in district plans and avoid urban or rural residential development on such land.
LF-LS-AER13	Support	Maintaining availability and capability of highly productive land is supported.	Retain LF-LS-AER13
TOPICS			
EIT - Energy, infrastructure and transport			
EIT-INF-O5 Integration	Support	HortNZ supports an integrated and co-ordinated approach to development of nationally and regionally significant infrastructure.	Retain EIT-INF-O5 Integration

EIT-INF-O6 Long term planning for electricity transmission infrastructure	Oppose	There are at least 13 definitions relating to infrastructure in the Plan – but electricity transmission is not one of them. So it is not clear what the objective is seeking to address. As electricity sub-transmission infrastructure is defined it would be appropriate that the policy applies to that infrastructure.	Amend EIT-INF-O6 Long term planning for electricity <u>sub</u> -transmission infrastructure
EIT-INF-P15 Protecting nationally or regionally significant infrastructure	Oppose	A direction to ‘protect’ nationally or regionally significant infrastructure provides a greater level of protection than anticipated in higher order national documents. For instance the NPS-ET seeks to recognise and provide for the National Grid but does not seek to protect it. It also seeks to avoid reverse sensitivity, to the extent reasonably possible, so it is not an absolute requirement.	Reword EIT-INF-P15 as follows: Protecting <u>Recognising and providing for</u> nationally or regionally significant infrastructure Seek to avoid, <u>to the extent reasonably possible</u> , the establishment of <u>sensitive</u> activities that result in reverse sensitivity effects on nationally or regionally significant infrastructure and/ or compromise the functional or operational needs of nationally or regionally significant infrastructure.
EIT-INF-P16 Providing for electricity transmission and the National Grid	Oppose	The National Grid is provided for as nationally or regionally significant infrastructure so is provided for in P15. Electricity transmission is not defined so it is not clear what transmission infrastructure P16 is intended to include. The policy considers a number of areas within the region but overlooks the effects that can be experienced in rural locations, especially highly	Clarify what ‘electricity transmission infrastructure’ EIT-INF-P16 applies to. Amend EIT-INF-P16 (5) by adding: and highly productive land

		productive land where production can be reduced due to constraints from transmission infrastructure	
EIT-INF-M5 District plans	Oppose in part	It is appropriate that the National Grid is identified on district plan maps but it should not be required to map all other electricity transmission network.	Amend EIT-INF-M5 (3) Map the National Grid and identify a buffer corridor within which sensitive activities shall generally not be allowed.
EIT-INF-AER7	Oppose	Changes are sought to EIT-INF-P15 which need to be reflected in the AER.	Amend EIT-INF-AER7 as follows: Reverse sensitivity effects on nationally and regionally significant infrastructure from sensitive activities will be avoided to the extent reasonably possible.
EIT- TRAN-O8 Transport system	Support	Growers are reliant on a reliable transport system to get produce to markets.	Retain EIT- TRAN-O8 Transport system
EIT-TRAN-P18 Integration of the transport system	Support	Growers are reliant on a reliable transport system to get produce to markets.	Retain EIT- TRAN-P18 Transport system
EIT-INF-O5 Integration	Support	HortNZ supports an integrated and co-ordinated approach to development of nationally and regionally significant infrastructure.	Retain EIT-INF-O5 Integration
EIT-INF-O6 Long term planning for electricity transmission infrastructure	Oppose	There are at least 13 definitions relating to infrastructure in the Plan - but electricity transmission is not one of them. So it is not clear what the	Amend EIT-INF-O6 Long term planning for electricity <u>sub</u> -transmission infrastructure

		objective is seeking to address. As electricity sub-transmission infrastructure is defined it would be appropriate that the policy applies to that infrastructure.	
EIT-INF-P15 Protecting nationally or regionally significant infrastructure	Oppose	A direction to 'protect' nationally or regionally significant infrastructure provides a greater level of protection than anticipated in higher order national documents. For instance the NPS-ET seeks to recognise and provide for the National Grid but does not seek to protect it. It also seeks to avoid reverse sensitivity, to the extent reasonably possible, so it is not an absolute requirement.	Reword EIT-INF-P15 as follows: Protecting <u>Recognising and providing for</u> nationally or regionally significant infrastructure Seek to avoid, <u>to the extent reasonably possible</u> , the establishment of <u>sensitive</u> activities that result in reverse sensitivity effects on nationally or regionally significant infrastructure and/ or compromise the functional or operational needs of nationally or regionally significant infrastructure.
EIT-INF-P16 Providing for electricity transmission and the National Grid	Oppose	The National Grid is provided for as nationally or regionally significant infrastructure so is provided for in P15. Electricity transmission is not defined so it is not clear what transmission infrastructure P16 is intended to include. The policy considers a number of areas within the region but overlooks the effects that can be experienced in rural locations, especially highly productive land where production can be reduced due to constraints from transmission infrastructure	Clarify what 'electricity transmission infrastructure' EIT-INF-P16 applies to. Amend EIT-INF-P16 (5) by adding: and highly productive land

EIT-INF-M5 District plans	Oppose in part	It is appropriate that the National Grid is identified on district plan maps but it should not be required to map all other electricity transmission network.	Amend EIT-INF-M5 (3) Map the National Grid and identify a buffer corridor within which sensitive activities shall generally not be allowed.
EIT-INF-AER7	Oppose	Changes are sought to EIT-INF-P15 which need to be reflected in the AER.	Amend EIT-INF-AER7 as follows: Reverse sensitivity effects on nationally and regionally significant infrastructure from sensitive activities will be avoided to the extent reasonably possible.
EIT- TRAN-O8 Transport system	Support	Growers are reliant on a reliable transport system to get produce to markets.	Retain EIT- TRAN-O8 Transport system
EIT-TRAN-P18 Integration of the transport system	Support	Growers are reliant on a reliable transport system to get produce to markets.	Retain EIT- TRAN-P18 Transport system
HAZ - Hazards and Risks			
HAZ-NH-P2 Risk assessments	Support in part	Assessing the risk of natural hazards but it should be clear that the framework set out in App6 will be used by local authorities to develop a risk table for their communities. Not all land uses should be required to undertake a risk assessment - it should be where there is a risk from an identified natural hazard.	Amend HAZ-NH-P2 Risk assessments to clarify that it is local authorities that will assess the level of natural hazard risk using criteria in APP6.

HAZ-NH-P9 Protection of hazard mitigation measures.	Oppose in part	Hazard mitigation measures is not defined so it is not clear the extent of activities that may be included. While Points 1-3 are valid, limiting other activities that may result in reverse sensitivity effects is not a natural hazard issue in terms of achieving the objectives to manage or reduce risk.	Amend HAZ-NH-P9 Protection of hazard mitigation measures by deleting clause (4).
HAZ-NH-P11 Kaitiaki decision making	Oppose in part	<p>The policy specifically provides for mana whenua to be involved in decision making and management processes relating to their land and interests.</p> <p>It is considered that all landowners should have the ability to be involved in decision making and management processes as it relates to their land.</p> <p>Therefore, the policy should be broadened to apply to all landowners.</p>	<p>Amend HAZ-NH-P11 Kaitiaki Decision making</p> <p>Recognise and provide for the role of Kai Tahu as kaitiaki over wahi tupuna, Maori reserves and freehold land <u>and landowners over private property</u> where land is susceptible to natural hazards by involving mana whenua <u>and landowners</u> in decision making and management processes.</p>
HAZ-NH-M2 Local authorities	Support in part	HAZ-NH-M2 requires local authorities develop a natural hazard risk table for their communities. No timeframe is set for this process. HAZ-NH-M 3 and M4 sets out requirements for resource consents or plan changes where the identification has not occurred. There should be direction in the pRPS of the timeframe in which such identification is to occur to provide certainty for consent applicants in terms of undertaking such an assessment. Any risk assessment needs to be	<p>Amend HAZ-NH-M2 by including a timeframe in (1)</p> <p>By December 2022...</p>

		commensurate with the level of risk from the proposed activity.	
HAZ-NH-M3 Regional plans	Oppose in part	HAZ-NH-M3 sets out requirements for resource consents or plan changes where the identification by council has not occurred Any risk assessment needs to be commensurate with the level of risk from the proposed activity.	Amend HAZ-NH-M3 7) a) by adding 'commensurate with the level of risk from the proposed activity'
HAZ-NH- M4 District plans	Oppose in part	HAZ-NH-M4 sets out requirements for resource consents or plan changes where the identification by Council has not occurred Any risk assessment needs to be commensurate with the level of risk from the proposed activity	Amend HAZ-NH-M4 7) a) by adding 'commensurate with the level of risk from the proposed activity'
HAZ-CL-O3 Contaminated land	Oppose in part	HAZ-CL-O3 seeks to 'protect' human health, mana whenua values and the environment in Otago. The RPS2019 sought to ensure that contaminated land does not cause harm to human health or pose an unacceptable risk. Such an approach more clearly focuses on the response to contaminated land and the outcome that is sought.	Amend HAZ-CL-O3 Contaminated land Contaminated land and waste material do not harm human health, mana whenua values and the environment in Otago.
HAZ-CL-P14 Managing contaminated land	Oppose in part	It needs to be clear that just because hazardous substances have been or are being used on land that the land is not automatically classed as contaminated land. The definition of contaminated land is that the hazardous substance in or on the land has a significant adverse	Amend HAZ-CL-P14 by adding an additional point 3a) determining whether significant adverse effects on the environment will result from the hazardous substances in or on the land.

		effect on the environment or is reasonably likely to have significant adverse effect on the environment. Therefore the policy approach should be to determine whether significant adverse effects are likely.	
HAZ-CL-M6 Regional plans	Oppose in part	It should be clear that any land identified as 'contaminated land' is reasonably likely to have a significant adverse effect on the environment, not just that hazardous substances have or are being used on the site.	Amend HAZ-CL-M6 (1) In accordance with HAZ-CL-P13 maintain a register or database of sites where hazardous activities and industries are or have been used in Otago where it is reasonably likely to have significant adverse effects on the environment.
HAZ-CL-M7 District plans	Support in part	It should be clear that the territorial authorities are responsible for implementing the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS) when land use change, subdivision or earthworks are undertaken.	Include in HAZ-CL-M7 the following: Territorial authorities are responsible for implementing the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS) when land use change, subdivision or earthworks are undertaken.
HCV - Historical and cultural values			
HCV-HH-M5	Support in Part / Oppose in Part	HortNZ support the method of buffer of setbacks between historic heritage places or areas and other incompatible activities where it has been identified that the activity would have an adverse	HCV-HH-M5 -District Plans <i>Territorial authorities</i> must prepare or amend and maintain their <i>district plans</i> to the extent necessary to: ...

		effect on the identified historic heritage values and qualities.	<p>(3) Include implementation methods to protect <i>historic heritage</i> places and areas required by HCV-HH-P5, and may include:</p> <p>...</p> <p>(b) conditions on <i>resource consents</i> and designations to provide buffers or setbacks <u>to mitigate adverse effects on the historic heritage values and qualities between of historic heritage places or areas and other from</u> incompatible activity.</p>
UFD - Urban form and development			
UFD Chapter	Oppose in part	<p>The Urban form and development chapter includes provisions for the rural area. These do not neatly fit within a chapter that has a clear focus on urban form and giving effect to the NPS-UDC.</p> <p>The National Planning Standards structure standard for RPS provides for other matters other than those listed to be included as a chapter in Part 3. (RPS Standard Direction 10)</p> <p>HortNZ considers that the rural area is distinct from the urban area and should be provided as a standalone chapter.</p>	<p>Include a new chapter RU - Rural Areas. Move the following provisions from UFD to the RU chapter:</p> <ul style="list-style-type: none"> • UFD-O4 • UFD-P7 • UFD-P8

UFD-O2- Development I urban areas	Support in part	UFD-O2 sets out how development and change in the urban areas will occur. Point 6 seeks to minimise conflict with incompatible activities. It should be clear that such conflict is both within the urban area and in the urban -rural interface.	Amend UFD-O2 (6) as follows: Minimises conflict between incompatible activities <u>within the urban area and at the rural -urban interface</u>
UFD-O3 Strategic planning	Support in part	UFD-O3 sets out considerations for strategic planning for development of urban areas including regionally significant features and values identified by the RPS. Highly productive land has been identified in the pRPS as a significant resource to be maintained and this should be recognised in the strategic planning for urban development. UFD-O4 refers the HPL in the context of the rural areas but it should be a consideration in the development of urban areas.	Amend UFD-O3 (2) by adding <u>'including highly productive land'</u>
UFD-O4 Development in rural areas	Support in part	HortNZ supports the priority accorded highly productive land in UFD-O4 (2). The identification of areas for urban expansion, rural lifestyle and rural residential development should only be located where there is potential for reverse sensitivity effects which would compromise rural production activities. Outside of these area development should only occur is there is a functional	Amend UFD-O4 as follows: Development in Otago's rural areas occurs in a way that: 4) <u>Does not cause significant adverse effects on the values of outstanding natural features and landscapes</u> Avoids impacts on significant values and features identified in this RPS

		<p>need for an activity to locate in the rural area.</p> <p>This framework is consistent with the National Planning Standards description of the Rural Zones.</p> <p>There is a lack of clarity as to what 'significant values and features identified in the RPS' would include.</p> <p>As stated above this objective should be located in a new Rural Areas chapter.</p>	<p>2) Avoids, as the first priority, land and soils identified as highly productive <u>land as identified</u> by LF-LS-P19 unless there is an operational need for the development to be located in the rural area;</p> <p>3) Only provides for urban expansion, and rural lifestyle and rural residential development and the establishment of sensitive activities in locations identified through strategic planning or zoned within district plans as suitable for such development <u>where the potential for reverse sensitivity effects will not compromise primary production;</u></p> <p>4.) Outside of areas identified in 3) maintains and enhances the natural and physical resources that support only <u>provide for activities that have a functional need to locate in the rural area and will not compromise the</u> productive capacity, rural character and long-term viability of the rural sector and rural communities.</p>
UFD-P1 Strategic planning	Support in part	UFD-P1 sets out matters to be considered at the strategic planning level for urban development. As sought in respect to UFD-O3 it is sought that	Amend UFD-P1 (8) by adding: <u>including highly productive land.</u>

		location of highly productive land is included in such assessment.	
UFD-P4 Urban expansion	Support	HortNZ supports the development of integrated and well-functioning urban environments that avoids highly productive land and an appropriately designed and managed rural urban interface and defensible boundary, such as a road or feature.	Retain UFD-P4
UFD-P7 Rural areas	Support in part	<p>HortNZ supports UFD-P7 which provides for the management of rural areas, with a priority on primary production and related services. Such an approach is consistent with the National Planning Standard descriptions for rural zones.</p> <p>It is unclear what important features or values identified in the RPS would be provided for. The policy should specify. It may be that primary production can occur within such areas and should not be precluded.</p> <p>HortNZ seeks that this policy is located in a new Rural Areas chapter.</p> <p>A change is sought to providing for rural industry to clarify the wording.</p>	<p>Retain UFD-P7</p> <p>Amend 4) as follows:</p> <p>Facilitates <u>Provides for rural industry and activities which support rural production</u></p>
UFD-P8 Rural lifestyle and rural residential zones	Support in part	The National Planning Standard does not have a 'rural residential zone, only a rural lifestyle zone, large lot residential zone or settlement zone. Therefore, it is	<p>Retain UFD-P8 subject to the following changes:</p> <p>Delete 'rural residential zones'</p>

		<p>not appropriate to include rural residential zones within the RPS.</p> <p>The direction of the policy is supported, particularly that highly productive land is avoided and impacts on rural production are minimised. However, HortNZ would prefer that such effects are 'avoided, and where avoidance is not possible mitigate to the least extent.</p> <p>HortNZ seeks that this policy is located in a new Rural Area chapter.</p>	<p>Amend clause 3) as follows:</p> <p><u>Avoids, and where avoidance is not possible, mitigate to the least extent possible</u> impacts on rural production potential, rural character and potential for reverse sensitivity effects <u>on primary production activities in adjoining rural zones.</u></p>
UFD-M2 District plans	Support in part	<p>UFD-M2 sets out how development and change in the urban areas will occur. Point 3 e) seeks to minimise conflict with incompatible activities. It should be clear that such conflict is both within the urban area and in the urban -rural interface.</p>	<p>Amend UFD-M2 (3 e) as follows:</p> <p>Minimise the potential for reverse sensitivity effects to arise by managing the location of incompatible activities <u>within the urban area and at the rural - urban interface</u></p> <p>Retain UFD-M2 8) and 9)</p>
UFD-E1 Explanation	Support	<p>Paragraph 2 of the Explanation describes provisions for the rural areas. This explanation should be moved to the new chapter for the rural area.</p>	<p>Move UFD-E1 Para 2 to the new chapter for the rural area.</p>
UFD- PR1 Principal reasons	Support in part	<p>Paragraph 6 starts with stating that rural areas are attractive as residential living areas. The focus on the rural area should be on the primary production activities that can only be undertaken in the rural areas.</p>	<p>Move UFD-PR1 Para 6 to the new chapter for the rural area and amend as follows:</p> <p>Rural areas are attractive as residential living areas and for other non-rural activities.</p>

			The rural areas are important to Otago for the primary production activities that are undertaken within those areas. There is pressure from non-rural activities, such as residential living and lifestyle to locate within the rural area. However, such activities can adversely affect rural production and are incompatible with primary production activities.
UFD-AER11	Oppose	The AER for rural areas does not appropriately describe the outcome sought for the rural area. This AER should be included in the new rural area Chapter.	Delete UFD- AER11 and replace with: Primary production will continue within rural areas where the focus is on rural production with only rural supporting activities locating within the zone.
PART 4 - EVALUATION AND MONITORING			
Monitoring the efficiency and effectiveness of the policy statement	Support	HortNZ supports ORC taking ownership of their monitoring responsibilities and looks forward to robust data collection and transparent sharing of the information.	Retain
PART 5 - APPENDICES AND MAPS			
Map 1 - Freshwater Management Units	Support	The FMU's and Rohe as identified on Map 1 enable catchment specific management in future plans.	Retain

APP6 – Methodology for <i>natural hazard risk</i> assessment – step 1 – Determine the likelihood	Support in Part / Oppose in Part	<p>Stating ‘once every’ in the table is misleading. The indicative frequency is a probability of these events occurring every year. Just because a natural hazard event occurred in year one, does not mean that it will not occur again within the specified timeframe. For example: a 2% Annual Exceedance Probability (AEP), means that there is a 2% chance that this event would occur each year.</p> <p>Also, with the known impacts of climate change on our weather systems, making sever weather events more frequent, it is better that a community to be prepared. Therefore stating ‘once every’ provide a false sense of security to the community.</p>	Delete the words ‘once every’ and ‘up to once every’ from the table in the four instances that it occurs.
APP6 – Methodology for <i>natural hazard risk</i> assessment – step 2 – Natural hazard consequence	Support in Part / Oppose in Part	The significant impacts of a natural hazard on food production, food supply and food security are not acknowledged in Step 2.	<p>Insert additional consideration as follows:</p> <p>...</p> <p><u>(12) Impacts on food production, food supply and food security.</u></p>
General submission – te reo terms and phrases	Oppose in Part	There are many te reo terms and phrases in the proposed RPS that are not commonly understood. The RPS would benefit from a glossary of these terms and phrases. Without it, there is a risk that the provisions will not be implemented as intended, and also that	Include a glossary of all te reo terms and phrases

		meanings may be established through case law.	
General Submission - lacks clarity across plan	Oppose	There are places where the pRPS seeks to 'avoid impacts on significant values and features identified in this RPS' (e.g., UFD-O4 (UFD-P4 (5) UFD-P7 (1))). It is considered that such an approach is uncertain and does not provide appropriate direction. It should be clear that if specific values and features are to be considered they should be listed.	Ensure that there is clarity about what significant values and features identified in this RPS are to be considered for specific activities.