

**From:** [Rachel McClung](#)  
**To:** [RPS](#)  
**Cc:** [Louise Ford](#)  
**Subject:** PORPS Further Submission  
**Date:** Thursday, 11 November 2021 1:57:02 p.m.  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[Further Submission HortNZ Otago Regional Policy Statement 21.pdf](#)  
[Further Submission HortNZ Otago Regional Policy Statement 21.docx](#)

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Kai ora,

Please find attached the further submission of Horticulture New Zealand in the form which is prescribed as Form 6 in Schedule 1 of the Resource Management (Forms, Fees and Procedures) Regulations 2003.

The further submission will be served on all submitters to which it relates within the statutory timeframes.

Ngā mihi

**Rachel McClung**

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FURTHER  
SUBMISSION

# Proposed Otago Regional Policy Statement 2021

Thursday 11<sup>th</sup> November

**To:** Otago Regional Council

**Name of Submitter:** Horticulture New Zealand

## Contact for Service:

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# OVERVIEW

## Submission structure

- 1 Part 1: Further Submission
- 2 Part 2: Table of Further Submission points

## Our submission

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

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

# Further Submission

1. Horticulture New Zealand's (HortNZ) further submissions are contained in the attached table below.
2. HortNZ represents commercial fruit and vegetable growers in Otago Region, so represents a relevant aspect of the public interest.
3. HortNZ is not a trade competitor and could not gain any advantage in trade competition through this further submission.
4. HortNZ wishes to be heard in support of its further submissions.
5. If others make similar submissions, HortNZ will consider presenting a joint case with them at the hearing.

## Further submission on behalf of HortNZ on Proposed Otago Regional Policy Statement 2021

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
New Zealand Pork Industry Board	00240.001	INTR – Purpose	Support	Support intent of submission	Accept submission
Wise Response Society Inc	00509.008	INTR – Purpose	Oppose	Disagree. Economic growth can be environmentally sustainable.	Reject submission
Federated Farmers of New Zealand	00239.001	INTR – Purpose	Support	Support proposed rephrasing.	Accept submission
Federated Farmers of New Zealand	00239.004	HPSW – Statutory Context	Support	Provides clarity	Accept submission
Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.009	TERP – Definitions General	Support	Seeks consistency of terminology	Accept submission
Waitaki Irrigators Collective Limited	00213.013	TERP – Definitions New definition – Precautionary approach	Support	Proposed definition is appropriate and aligns with what is commonly understood as the Precautionary approach.	Accept submission

## PART 2

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
OWRUG	00235.125	TERP – Definitions New definition – Effects Management Hierarchy (other matters)	Support	Provides clarity	Accept submission
Waka Kotahi NZ Transport Agency	00305.005	TERP – Definitions New definition – Reverse Sensitivity	Support	Support the inclusion as the term is used throughout the policy statement and interpretation of the RPS will benefits from the definition.	Accept submission
Fonterra Co – operative Group Limited	00213.007	TERP – Definitions New definition – Rural Industry	Support	Consistent with National Planning Standards	Accept submission
Fulton Hogan Limited	00322.002	TERP – Definitions Primary Production	Oppose	The notified definition is consistent with the National Planning Standards. The decision sought by this submitter is not.	Reject submission
Kāi Tahu ki Otago / Aukaha	00226.033	TERP – Definitions Primary Production	Oppose	The notified definition is consistent with the National Planning Standards. The decisions requested by this submitter is not.	Reject submission

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
Federated Farmers of New Zealand	00239.008	TERP – Definitions Regionally significant infrastructure	Support	Decisions sought simplifies and strengthen the definition.	Accept submission
Fonterra Co – operative Group Limited	00213.009	TERP – Definitions Sensitive activity	Support	Consistent with approach in other resource managements plans across New Zealand.	Accept submission
Network Waitaki Ltd	320.011	TERP Definition Significant electricity distribution infrastructure	Oppose in part	The definition Significant electricity distribution infrastructure was included in the Operative RPS as a result of appeals. The inclusion in the Proposed RPS would only be supported if the policy framework that uses the definition is consistent with the Operative RPS.	Accept submission if the related policy framework is consistent with the Operative RPS
PowerNet Ltd	511.011	TERP Definition Significant electricity distribution infrastructure	Oppose in part	The definition Significant electricity distribution infrastructure was included in the Operative RPS as a result of appeals. The inclusion in the Proposed RPS would only be supported if the policy framework that uses the definition is consistent with the Operative RPS.	Accept submission if the related policy framework is consistent with the Operative RPS
Meridian Energy Ltd	306.012	TERP Definition Upgrade	Oppose in part	The term ‘upgrade’ is used in the EIT chapter so its meaning should be clear.	Accept submission to include definition of upgrade but

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
				There should also be consideration of 'minor upgrade' which is likely to have less than minor adverse effects.	distinguish between upgrade and minor upgrade.
Aurora Energy Ltd	315.002	TERP definition Distribution network	Oppose	The inclusion of the note does not assist and is dependent on the interaction between various infrastructure terms. The notified definition was consistent with the definition in the Operative RPS.	Reject submission
Transpower NZ Ltd	314.003	TERP Definition Electricity sub-transmission infrastructure	Support	The change sought clarifies that the National Grid is not electricity sub transmission.	Accept submission
Network Waitaki Ltd	320.005	TERP Definition Functional need	Oppose	The definition is from the National Planning Standards and the change sought is not consistent with the Standard.	Reject submission
NZ Infrastructure Commission	321.004	TERP Definition Infrastructure	Oppose	The definition is taken from the RMA and should not be amended as sought by the submitter as the term will have a different context than that anticipated in the legislation.	Reject submission
Transpower NZ Ltd	314.005	TERP Definition Nationally	Support	While the definition is largely based on the definition in the NPSUD 2020	Accept submission



Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
		significant infrastructure		amending it to be applicable to Otago is appropriate.	
Christchurch International Airport Ltd (CIAL)	307.001	TERP Definition Regionally significant infrastructure	Oppose	The proposed definition clearly states which airports are regionally significant. The change sought by the submitter is open-ended and does not provide certainty as to what is regionally significant.	Reject submission
Dept of Corrections	102.001	TERP Definition Regionally significant infrastructure	Oppose	Inclusion of social infrastructure is not supported as regionally significant, particularly given that activities such as correction facilities can be designated.	Reject submission
Aurora Energy Ltd	315.010	TERP Definition Regionally significant infrastructure	Oppose	Inclusion of significant electricity distribution infrastructure as regionally significant infrastructure is inconsistent with the approach to significant electricity distribution infrastructure in the Operative RPS as Policy 4.3.2 does not include significant electricity distribution infrastructure as regionally significant.	Reject submission
Network Waitaki Ltd	320.001	TERP Definition Regionally significant infrastructure	Oppose	Inclusion of significant electricity distribution infrastructure as regionally significant infrastructure is inconsistent with the approach to significant	Reject submission

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
				electricity distribution infrastructure in the Operative RPS as Policy 4.3.2 does not include significant electricity distribution infrastructure as regionally significant.	
PowerNet Ltd	511.001	TERP Definition Regionally significant infrastructure	Oppose	Inclusion of significant electricity distribution infrastructure as regionally significant infrastructure is inconsistent with the approach to significant electricity distribution infrastructure in the Operative RPS as Policy 4.3.2 does not include significant electricity distribution infrastructure as regionally significant.	Reject submission
Royal Forest and Bird Protection Society of NZ	230.011	TERP Definition Regionally significant infrastructure	Oppose	Inclusion of the local distribution network in (2) would mean that all distribution in the region would be regionally significant. This is inappropriate.	Reject submission
Aurora Energy Ltd	315.011	TERP Definition Specified infrastructure	Oppose	Regionally significant infrastructure should be that is identified in a RPS or Regional Plan.	Reject submission

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
Network Waitaki Ltd	320.011	TERP Definition Significant electricity distribution infrastructure	Support in part	The definition Significant electricity distribution infrastructure was included in the Operative RPS as a result of appeals. The inclusion in the Proposed RPS would only be supported if the policy framework that uses the definition is consistent with the Operative RPS.	Accept submission if the related policy framework is consistent with the Operative RPS
PowerNet Ltd	511.011	TERP Definition Significant electricity distribution infrastructure	Support in part	The definition Significant electricity distribution infrastructure was included in the Operative RPS as a result of appeals. The inclusion in the Proposed RPS would only be supported if the policy framework that uses the definition is consistent with the Operative RPS.	Accept submission if the related policy framework is consistent with the Operative RPS
Meridian Energy Ltd	306.012	TERP Definition Upgrade	Support in part	The term 'upgrade' is used in the EIT chapter so its meaning should be clear. There should also be consideration of 'minor upgrade' which is likely to have less than minor adverse effects.	Accept submission to include definition of upgrade but distinguish between upgrade and minor upgrade.
OWRUG	00235.058	SRMR – New – Provision	Support	Amend to identify a regionally significant value and resource management issue to identify Otago's food production capacity.	Accept submission

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
New Zealand Pork Industry Board	00240.004	SRMR – Introduction	Support	Amend to identify a regionally significant value and resource management issue to identify Otago’s food production capacity.	Accept submission
OWRUG	00235.021	SRMR - Introduction	Support	Amend to identify a regionally significant value and resource management issue to identify Otago’s food production capacity.	Accept submission
OWRUG	00235.023	SRMR - Introduction	Support	Amend to identify a regionally significant value and resource management issue to identify Otago’s food production capacity.	Accept submission
Federated Farmers of New Zealand	00239.020	SRMR – I1	Support	Amend to identify natural hazard impacts on Otago’s food production capacity.	Accept submission
OWRUG	00235.024 00235.025 00235.026 00235.027	SRMR – I1	Support	Amend to identify natural hazard impacts on Otago’s food production capacity.	Accept submission
Federated Farmers of New Zealand	00239.021	SRMR – I2	Support	Amend to identify natural hazard impacts on Otago’s food production capacity.	Accept submission

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
OWRUG	00235.028 00235.029 00235.030 00235.031	SRMR – I2	Support	Amend to identify natural hazard impacts on Otago’s food production capacity and transition to lower emission production systems.	Accept submission
Federated Farmers of New Zealand	00239.022	SRMR – I3	Support	Amend to identify impacts on Otago’s food production capacity.	Accept submission
OWRUG	00235.032 00235.033 00235.034 00235.036	SRMR – I3	Support	Amend to identify impacts on Otago’s food production capacity.	Accept submission
AgResearch Limited	00208.004	SRMR – I4	Support	Support proposed rewording as it is clearer than notified version.	Accept submission
Federated Farmers of New Zealand	00239.023	SRMR – I4	Support	Agree with this statement. There is older housing stock across Otago that would benefit from regeneration.	Accept submission
Fulton Hogan Limited	00322.005 00322.006	SRMR – I4	Support	Reverse sensitivity effects are a significant issue for horticulture.	Accept submission
OWRUG	00235.037	SRMR – I4	Support	Agree that water can be affected by poorly managed urban growth and development.	Accept submission
OWRUG	00235.038 00235.039	SRMR – I5	Support	Support inclusion of additional explanations.	Accept submission

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
	00235.040 00235.041 00235.042				
Federated Farmers of New Zealand	00239.024	SRMR – I5	Support	Support amended wording as sought.	Accept submission
Federated Farmers of New Zealand	00239.025	SRMR – I6	Support	Support amended wording as sought.	Accept submission
OWRUG	00235.044 00235.045 00235.046 00235.047	SRMR – I6	Support	Support acknowledgement of affects on human health, people and communities, as well as other amendments sought.	Accept submission
Federated Farmers of New Zealand	00239.026	SRMR – I7	Support	Support amended wording as sought.	Accept submission
OWRUG	00235.052	SRMR – I10	Support	Acknowledge that the planning framework <i>has at times and in some locations failed</i> .	Accept submission
Federated Farmers of New Zealand	00239.028	SRMR – I11	Support	Support amended wording as sought.	Accept submission
OWRUG	00235.061	IM – O4	Support	Support retention of Objective	Accept submission

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
Federated Farmers of New Zealand	00239.037	IM – P4	Support	Support inclusion of clause (5)	Accept submission
Federated Farmers of New Zealand	00239.038	IM – P6	Support	Support amendments sought	Accept submission
OWRUG	00235.077	LF – WAI – O1	Support	Support amendments sought	Accept submission
OWRUG	00235.082	LF – WAI – E1	Support	Support amendments sought.	Accept submission
OWRUG	00235.093	LF – WAI – O8	Support	Support amendments sought.	Accept submission
Federated Farmers of New Zealand	00239.090	LF – FW – M5	Support	Support amendments sought.	Accept submission
Beef & Lamb NZ and Deer Industry NZ	00237.045	LF – LS – General	Support	Support proposed RPS giving effect to NPS-HPL once gazetted.	Accept submission
Transpower New Zealand Limited	00314.027	LF – LS – P19	Oppose	Oppose land use hierarchy of suggested wording in submission. Highly productive land is a limited resource which must be optimised for the social and economic wellbeing of society.	Reject Submission
Infinity Investment Group Holdings Ltd	00414.002	LF – LS – P19	Oppose	Highly productive land is a limited resource. HortNZ support the intent of the notified policy which seeks to maintain the availability and productive	Reject Submission

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
				capacity of Highly Productive Land. The amendments sought weaken the intent of the policy.	
Contact Energy Ltd	318.024	EIT-EN-O2	Oppose	Renewable electricity generation should be recognised and provided for – not ‘protected.’	Reject submission
Trustpower Ltd	311.031	EIT-EN-O2	Oppose	Renewable electricity generation should be recognised and provided for – not ‘protected.’	Reject submission
Contact Energy Ltd	318.025	EIT-EN-P1	Oppose	Renewable electricity generation should be recognised and provided for – not ‘protected.’	Reject submission
Trustpower Ltd	311.033	EIT-EN-P1	Oppose	Renewable electricity generation should be recognised and provided for – not ‘protected.’	Reject submission
Contact Energy Ltd	318.026	EIT-EN-P2	Oppose	Renewable electricity generation should be recognised and provided for – not ‘protected.’ There needs to also be recognition of other users of water.	Reject submission
Federated Farmers of NZ	239.117	EIT-EN-P4	Support	Recognition of highly production land is supported.	Accept submission



Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
Trustpower Ltd	311.038	EIT-EN-P7	Oppose	Abstraction of water does not create a reverse sensitivity effect. Changing the policy from 'minimising' to 'avoid' does not provide for recognition of other users of water.	Reject submission
Trustpower Ltd	311.040	EIT-EN-M1	Oppose	EIT-EN-M1 sought to restrict activities that may adversely affect the efficient functioning of renewable electricity generation infrastructure but the submitter seeks to amend it to 'avoid' activities that result in reverse sensitivity effects or compromise the operation. This is a very blunt approach with no recognition of the need of other activities.	Reject submission
Trustpower Ltd	311.041	EIT-EN-M2	Oppose	EIT-EN-M2 sought to restrict activities that may adversely affect the efficient functioning of renewable electricity generation infrastructure but the submitter seeks to amend it to 'avoid' activities that result in reverse sensitivity effects or compromise the operation. This is a very blunt approach with no recognition of the need of other activities.	Reject submission
Aurora Energy Ltd	315.012	EIT-INF- General	Oppose	The submitter seeks to replace all instances of the term 'electricity	Reject submission

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
				<p>transmission network’ with ‘distribution network’.</p> <p>The two networks are very different and the implications of changing the terms unilaterally could be significant.</p>	
PowerNet Ltd	511.033	EIT-INF- General	Oppose	The submitter seeks that the distribution network is ‘protected’ from other activities. Protection is a very high threshold which doesn’t even apply to the National Grid in the NPSET.	Reject submission
Transpower NZ Ltd	314.038	EIT-INF- New provision	Oppose in part	The list of matters in 5 should include ‘highly productive land’ as a matter of consideration to avoid adverse effects.	If the submission is accepted include highly productive land in clause 5).
Queenstown Airport Corp	313.015	EIT-INF-O4	Oppose in part	The submitter seeks a new objective to protect nationally and regionally significant infrastructure from the establishment of incompatible activities. Such an objective would prioritise such infrastructure over all other activities which is not the intent of the RMA. The Operative RPS seeks that infrastructure is managed and developed in a sustainable way and nationally and regionally significant infrastructure is recognised and provided for.	Reject submission seeking new objective.

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
Transpower NZ Ltd	314.035	EIT-INF-O6	Support	Rewording of the objective to focus specifically on the National Grid is clearer and gives effect to the NPSET.	Accept submission
Aurora Energy Ltd	315.046	EIT-INF-P10	Support	The addition of 'functional and operational' needs provides greater clarity in the policy.	Accept submission
Federated Farmers of NZ	239.127	EIT-INF-P12	Support	Consideration of the impacts on existing land uses is appropriate	Accept submission
Federated Farmers of NZ	239.128	EIT-INF-P13	Support	Consideration of the highly productive land is appropriate	Accept submission
Aurora Energy Ltd	315.053	EIT-INF-P15	Oppose	HortNZ does not support significant electricity distribution infrastructure being classed as regionally significant infrastructure.	Reject submission
Federated Farmers of NZ	239.129	EIT-INF-P15	Support	The submitter seeks similar changes to HortNZ submission 236.079	Accept submission
Infrastructure Commission	321.059	EIT-INF-P15	Oppose	A policy of 'avoid' or 'seek to avoid' does not recognise that other activities need to also be provided for.	Reject submission
Queenstown Airport Corp	313.022	EIT-INF-P15	Oppose	The submitter seeks a policy to protect nationally and regionally significant infrastructure from the establishment	Reject submission

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
				of other activities. Such a policy would prioritise such infrastructure over all other activities which is not the intent of the RMA. The Operative RPS seeks that infrastructure is managed and developed in a sustainable way and nationally and regionally significant infrastructure is recognised and provided for.	
Queenstown Lakes District Council	138.121	EIT-INF-P15	Support	HortNZ seeks that the policy 'recognises and provides for' rather than 'Protect'. This would achieve the outcome sought by the submitter.	Accept submission
Transpower NZ Ltd	314.036	EIT-INF-P15	Oppose	A policy of 'avoid' does not recognise that other activities need to also be provided for. This is inconsistent with the wording sought for EIT-INF-O6 by the submitter which sought that adverse effects on the National Grid are managed.	Reject submission
Aurora Energy Ltd	315.054	EIT-INF-P16	Support in part	The proposed policy is confusing as to what it applies to. Both the distribution operators and Transpower seek that the policy is reworded to clarify its purpose. HortNZ has also sought clarity on the policy.	Accept the submission to clarify the intent of the policy.

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
				The wording sought by the submitter is similar to Policy 4.4.5 in the Operative RPS where the distribution network is recognised and provided for.	
Transpower NZ Ltd	314.037	EIT-INF-P16	Support in part	<p>The proposed policy is confusing as to what it applies to. Both the distribution operators and Transpower seek that the policy is reworded to clarify its purpose. HortNZ has also sought clarity on the policy.</p> <p>If a separate policy is to be included for the National Grid the wording sought by the submitter is appropriate.</p>	Accept the submission to clarify the intent of the policy.
Aurora Energy Ltd	315.058	EIT-INF-M5	Oppose in part	Policy 4.4.5 of the Operative RPS requires that effects of potentially incompatible activities on significant electricity distribution infrastructure are managed through methods such as corridors. The submitter seeks that such activities shall generally not be allowed in the corridor, which is inconsistent with 4.4.5 and a policy of 'managing'.	If the submission is accepted ensure that the wording is consistent with Policy 4.4.5 of the Operative RPS.
Network Waitaki Ltd	320.026	EIT-INF-M5	Oppose in part	Policy 4.4.5 of the Operative RPS requires that effects of potentially incompatible activities on significant electricity distribution infrastructure	If the submission is accepted ensure that the wording is consistent with Policy 4.4.5 of the Operative RPS.

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
				are managed through methods such as corridors. The submitter seeks that such activities shall generally not be allowed in the corridor, which is inconsistent with 4.4.5 and a policy of 'managing'.	
PowerNet Ltd	511.026	EIT-INF-M5	Oppose in part	Policy 4.4.5 of the Operative RPS requires that effects of potentially incompatible activities on significant electricity distribution infrastructure are managed through methods such as corridors. The submitter seeks that such activities shall generally not be allowed in the corridor, which is inconsistent with 4.4.5 and a policy of 'managing'.	If the submission is accepted ensure that the wording is consistent with Policy 4.4.5 of the Operative RPS.
Transpower NZ Ltd	314.040	EIT-INF-M5	Oppose in part	The submitter seeks that adverse effects including reverse sensitivity effects on the National Grid be avoided. This is inconsistent with Policy 10 of the NPSET which seeks that activities be managed to the extent reasonably possible to avoid reverse sensitivity effects.	If the submission is accepted ensure that the wording is consistent with Policy 10 of the NPSET and includes 'managed to the extent reasonably possible'.
Transpower NZ Ltd	314.042	EIT-INF-AER7	Oppose	HortNZ has sought rewording of AER7 to better reflect the policy framework sought to be consistent with the NPSET.	Reject submission

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
Transpower NZ Ltd	314.050	UFD-O2	Oppose	The submitter seeks that adverse effects on the National Grid be avoided. This is inconsistent with Policy 10 of the NPSET which seeks that activities be managed to the extent reasonably possible to avoid adverse effects.	If the submission is accepted ensure that the wording is consistent with Policy 10 of the NPSET and includes 'managed to the extent reasonably possible'.
Transpower NZ Ltd	314.051	UFD-O4	Oppose	The submitter seeks to delete the priority for consideration of highly productive land. This is not supported as highly productive land is a limited resource which must be optimised for the social and economic wellbeing of society.	Reject submission
Infinity Investment Group Holdings Ltd	414.003	UFD-O4	Oppose	Highly productive land is a limited resource. The objective should ensure that future areas identified for urban expansion, rural lifestyle and rural residential development avoid locations where there is potential for reverse sensitivity that would compromise primary production activities.	Reject submission
Transpower NZ Ltd	314.053	UFD-P3	Oppose	The submitter seeks to delete the priority for consideration of highly productive land. This is not supported as highly productive land is a limited resource which must be optimised for	Reject submission

Submitter Name	Submission point number	Plan Provision	Support/oppose	Reason	Decision sought
				the social and economic wellbeing of society.	
Infinity Investment Group Holdings Ltd	414.004	UFD- P4	Oppose	Highly productive land is a limited resource. HortNZ support the intent of the notified policy which seeks to maintain the availability and productive capacity of Highly Productive Land. The amendments sought weaken the intent of the policy.	Reject Submission
Infinity Investment Group Holdings Ltd	414.005	UDF – P7	Oppose	Highly productive land is a limited resource. HortNZ support the intent of the notified policy which seeks to maintain the availability and productive capacity of Highly Productive Land. The amendments sought weaken the intent of the policy.	Reject Submission
Infinity Investment Group Holdings Ltd	414.006	UDF- P8	Oppose	Highly productive land is a limited resource. HortNZ support the intent of the notified policy which seeks to maintain the availability and productive capacity of Highly Productive Land. The amendments sought weaken the intent of the policy.	Reject Submission