

**BEFORE THE HEARING COMMISSIONERS**

**DUNEDIN**

**IN THE MATTER** of the Resource Management Act 1991  
(**RMA** or **the Act**)

**AND**

**IN THE MATTER** of the Proposed Otago Regional Policy  
Statement 2021 (Non-freshwater parts)

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**STATEMENT OF EVIDENCE OF VANCE HODGSON (PLANNING) ON  
BEHALF OF HORTICULTURE NEW ZEALAND**

**23 November 2022**

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## EXECUTIVE SUMMARY

1. The submission of Horticulture New Zealand (**HortNZ**) primarily centres around a request that 'food production' be included in the Regional Policy Statement as a significant resource management issue with reasons including the role of food production in promoting human health and well-being, the regional value of food production in Otago and the opportunity horticulture, in particular, presents to reduce emissions while increasing food production.
2. In considering the HortNZ submission and the s42A analysis I agree with the s42A author that a new issue statement for food production is not necessary with coverage provided through the traditional issue suite proposed (with suggested amendments).
3. Notwithstanding this, I disagree with the assertion that the requested issue statement from HortNZ deals with *industry specific concerns*. Food production, security and supply is, in my opinion, a resource management issue of concern that has in the past had little direct attention and assumed to be dealt with broadly in planning instruments. This issue straddles several of the significant resource management issues and importantly within the context of climate change.

## **INTRODUCTION**

### **Qualifications and experience**

1. My full name is Vance Andrew Hodgson. I am a director of Hodgson Planning Consultants Ltd, a resource management consultancy based in Waiuku. I have been employed in resource management related positions in local government and the private sector since 1994 and have been in private practice for 19 years. I hold a Bachelor of Resource and Environmental Planning (Hons) degree from Massey University.
2. I have worked in the public sector, where I was employed in student, assistant and senior policy planning roles by the Franklin District Council. I have provided resource management consultancy services to various district and regional councils. The scope of work for the public sector has been broad, covering plan change processes, submissions to national standards/regulations/policy statements and regulatory matters, mediation and appeals.
3. I have worked in geographic information system positions in the United Kingdom and worked for CKL Surveying and Planning Limited in Hamilton.
4. Living and working in the rural environment of South Auckland / North Waikato, I have had a continuous association with the rural production sector and in particular the horticultural industry. From 2012 I have been providing resource management advice to Horticulture New Zealand (**HortNZ**) on policy matters across New Zealand.
5. In private practice I regularly advise a range of private clients on statutory planning documents and prepare land use, subdivision, coastal permit, water permit and discharge permit resource consent applications. I have experience in resource consent applications, hearings and appeals on a range of activities, particularly for activities in the rural environment.

### **Code of Conduct**

6. I have been provided with a copy of the Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note dated 1 December 2014. I have read and agree to comply with that Code. This evidence is within my area of expertise, except where I state that I am relying upon the specified evidence of another person. I have not omitted

to consider material facts known to me that might alter or detract from the opinions that I express.

### **Scope of evidence**

7. As previously introduced, the submissions of HortNZ primarily centre around a request that 'food production' be included in the proposed Otago Regional Policy Statement (**pORPS**) as a significant resource management issue. This planning evidence addresses that point and reaches the determination that a separate issue statement is not warranted but recommends some changes intended to improve the policy statement for future interpretation and plan setting.
8. I rely on the technical assessments provided by:
  - (a) Lynette Wharf (planning); and
  - (b) Stuart Ford (economic);
 and the industry evidence provided by:
  - (c) Leanne Roberts.
9. My evidence addresses the submission points of HortNZ requesting that 'food production' be included in the pORPS as a significant resource management issue.

### **PLAN CHANGE PROVISIONS RELATING TO HORTNZ**

10. The submission of HortNZ highlights key issues for horticulture being:

#### 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.

11. The submission then covers these issues with several submission points which primarily centre around a request that 'food production' be included in the pORPS as a significant resource management issue with reasons including the role of food production in promoting human health and well-being, the regional value of food production in Otago and the opportunity horticulture in particular presents to reduce emissions while increasing food production.
12. I have considered that request as follows.

## Resource Management Issues

13. The Quality Planning website provides useful guidance for resource management practitioners for writing Issues.<sup>1</sup> I have set that guidance out below (in the shaded boxes) to assist in my assessment of whether 'food production' should be included as a distinct resource management issue.

**What is an Issue?**

**An issue is an existing or potential problem that must be resolved to promote the purpose of the RMA.**

**However, issues can also be opportunities to assist in promoting the purpose of the RMA.**

14. The issue described by HortNZ is as follows:
- Food production systems are coming under increased pressure from population growth, competing resource use, climate change, and the need to improve environmental outcomes*
15. As I understand the evidence of HortNZ, 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 and some of that production occurs in Otago.
16. There are existing and potential future problems associated with the food production system and the resources upon which that system relies, notably related to increased pressure from population growth (for land and volume of production), competing resource use, pests, and climate change,
17. I would not include "the need to improve environmental outcomes" as a problem in the context of defining an issue.
18. Food is clearly a human health need and that relationship to the purpose of the RMA is therefore explicit. Food production enables people and communities to provide for their health.

**Environmental issues usually concern conflicts between users of resources, allocation of resources, or effects on the environment. Such issues may represent an existing problem, or a potential problem arising from likely future resource use.**

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<sup>1</sup> [Writing Issues, Objectives and Policies | Quality Planning](#)

**An issue could relate to the cumulative effects of many resource uses or from a series of individual proposals.**

**An issue could also relate to the need to take positive action to correct the absence of policy or policy failures, or to promote positive effects (for example enhancement or restorative projects).**

19. Undoubtedly, there are resource use conflicts, resource allocation issues, and environmental effects (including cumulative effects) associated with food production.
20. The evidence of HortNZ has also clarified the positive effects associated that can occur via a transition to low emissions food production activity. This is not a solution to the issue of climate change but a positive contribution to mitigating the effects. Land use change is an inevitable climate change impact and will also be one of the key responses to the effects of climate change.

**Issues need to be derived from evidence and facts, and those concerning values (such as amenity): by consultation. Potential issues should be tested to see if they need to be included in, and managed through, the plan.**

21. The evidence and facts of HortNZ set out the issues for food production.
22. There is also a value-based issue related to food production that is to be considered. This is a matter the National Policy Statement for Freshwater Management 2020 (**NPSFM 2020**) expresses through Appendix 1B (Irrigation, Cultivation, and Production of Food and Beverages) for the National Objectives Framework (**NOF**) process. Additionally, *Specified Vegetable Growing Areas (SVGA)* are identified in two specific regions (not Otago) to address the relationship of food production with food security and domestic food supply.
23. I was not involved in the consultation process prior to notification of pORPS but note that food production values are expressed in the visions of four of the five FMUs. Noting that those parts of the pORPS are now identified as part of the freshwater planning instrument and will be considered via a separate process.
24. The s42A authors comment in Report 5: Submissions on Part 2 – Resource Management Overview as follows:



550. *The existing issue statements have been workshopped and widely consulted on, including public consultation and Reference Group workshops. I do not consider that it is appropriate to add significant resource management issues to the existing suite when they have not been through the same consultation process as the eleven issues that have been identified.*

551. *In addition, I consider that most of the requested issue statements deal with industry specific concerns and do not warrant a dedicated issue statement in a Regional Policy Statement. The requested language is solution focused rather than issue focused. Additionally, the key issues associated with the requested issue statements are addressed through one or more existing issues statements.<sup>2</sup>*

25. In terms of the comment in paragraph 550, as above I was not involved in the consultation process and cannot comment on the coverage of this matter or whether there is a limitation here for adding a significant resource management issue to the existing suite. My opinion aligns with that of the s42A authors in paragraph 551 that a new issue statement for food production is not necessary with coverage provided through the traditional issue suite proposed (with suggested amendments).
26. Notwithstanding this, I disagree with the assertion that the requested issue statement from HortNZ deals with *industry specific concerns*. Food production, security and supply is in my opinion a resource management issue of concern that has in the past had little direct attention and assumed to be dealt broadly in planning instruments.

## **HORTNZ SUBMISSION AND FURTHER SUBMISSIONS: INTRODUCTION AND GENERAL PROVISIONS**

### **Purpose**

27. The s42A clarifies that paragraph 3 of the Purpose includes *descriptors* which significant regional values and resource management issues may relate to.<sup>3</sup>

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<sup>2</sup> Otago Regional Council (2021) Section 42A Report, Proposed Otago Regional Policy Statement, Chapter 5: Submissions on Part 2 – Resource management overview, dated 27 April 2022, at 102.

<sup>3</sup> Otago Regional Council (2021) Section 42A Report, Proposed Otago Regional Policy Statement, Chapter 2: Submissions on Part 1 - Introduction and general provisions, dated 27 April 2022, at 13.

28. I agree with the s42A author that food production would fall within the descriptors of economy and communities. The question is whether the Purpose would be improved through an explicit reference to a food production descriptor.
29. Looking to the Description of the Region and across the plan generally (as per s42A recommended changes) I consider the Purpose would be improved by a specific food production descriptor.
30. As identified in the economic evidence of HortNZ, the regional contribution of food producers as a component of primary production from a GDP perspective is small (4%).<sup>4</sup> Notwithstanding the economic contribution, the evidence of HortNZ also sets out Otago's food production values regionally and nationally for food supply.
31. In my opinion the pORPS Purpose would be improved by adding a food production descriptor in paragraph 3 of the Purpose as follows.

*The ORPS responds to identified significant regional values and resource management issues relating to Otago's environment, historic heritage, economy, food production, recreational opportunities and communities. The ORPS sets out objectives, policies, and methods to resolve, over time, the identified issues as effectively and efficiently as possible. The ORPS gives effect to the statutory requirements set out in the Resource Management Act 1991 (RMA 1991), as well as relevant national direction instruments, and is informed by iwi authority planning documents. Regional plans and district plans must give effect to the ORPS.*

32. Supporting the addition, I note the policy statement as proposed and the s42A proposed amendments where food production would be recognised through the pORPS as follows:

*Description of the Region*

...

*Otago's economy centres around construction, primary production agriculture, tourism, ~~mineral mining~~, and education. The construction industry is a major contributor to employment numbers in Otago, supported by the region's population growth. The primary production sector is a source of revenue and employment for the*

districts and the wider region. **Otago's farms are also a key contributor to the national food supply network.** [emphasis added]

SRMR-11 – Natural hazards pose a risk to many Otago communities

Economic

...

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. **Food security can also be affected.** [emphasis added] Whilst the community and its businesses have substantial resilience to severe weather events and supply chain disruptions, there can be cumulative impacts from repeated events.

Social

...

Social impacts of events can result in immediate impacts on livelihoods for individuals and families, particularly for lower socio-economic groups. Health services disruptions can occur, including access to and changes in demand for services. Similarly, there can be disruptions to education service delivery. Housing impacts may require urgent provision for basic human needs including replacement shelter and housing, and **food** [emphasis added and water immediately following an event.

SRMR-14 – Poorly managed urban and residential growth affects productive land, treasured natural assets, infrastructure and community well-being.

Context

...

In addition, the productive land in Otago contributes to the social and economic wellbeing of the community through **production of food** [emphasis added] and other rural production-based products. However, where development occurs in a place or manner that removes or reduces the potential to use productive land, including through reverse sensitivity effects, the productive capacity of the land is compromised.

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

....

Activities occurring within or affecting the coastal environment include urban development, recreational activities, transport infrastructure, energy generation and transmission, land and marine based (e.g. aquaculture) **food production** [emphasis added] industries and other rural industry activities, carbon forestry and 393 plantation forestry, fishing, tourism, and mineral extraction.

CE-P9 – Activities on land within the coastal environment.

(3) recognising the importance of the provision of infrastructure, and **food production**, [emphasis added] and pastoral farming activities to the social, economic and cultural well-being of people and communities,

CE-PR1 – Principal reasons

...

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, **food production** [emphasis added] and other farming activities, plantation forestry, rural industry and mineral extraction.

Black text with blue shading

Parts of the Proposed Otago Regional Policy Statement notified on 30 September 2022 that are a freshwater planning instrument and are shown here for information only.

LF-VM-O2 – Clutha Mata-au FMU vision

(7)(b)

in the Dunstan, Manuherehia and Roxburgh rohe:

(ii) innovative and sustainable land and water management practices support **food production** [emphasis added] in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and

#### LF-VM-O3 – North Otago FMU vision

By 2050 in the North Otago FMU:

(6) innovative and sustainable land and water management practices support **food production** [emphasis added] in the area and improve resilience to the effects of climate change.

#### LF-VM-O4 – Taieri FMU vision

By 2050 in the Taieri FMU:

(8) innovative and sustainable land and water management practices support **food production** [emphasis added] in the area and improve resilience to the effects of climate change.

#### LF-VM-O6 – Catlins FMU vision

**By 2030 in the Catlins FMU:**

(6) healthy, clear and clean water supports opportunities for recreation and sustainable **food production** [emphasis added] for future generations.

#### LF-LS-E4 – Explanation

Highly productive land is land used for **food and fibre production** that provides economic and employment benefits. Providing for and managing such land types is essential to ensure its sustainability. The policies seek to identify and prioritise land used for productive purposes managing urban encroachment into rural environments where appropriate.

#### LF-LS-PR4 – Principal reasons

Soil health is vital to wider ecological health, human health, and economic resilience. Otago has a rich and long history of varied forms of **food and fibre production** on a wide range of soil types and in variable climatic conditions. Otago's highest quality soils (in terms of suitability for **food and fibre production**) are mainly on the Taieri

Plain, North Otago downlands, South Otago lowlands, parts of Central Otago and the Strath Taieri, and along some river margins. Their extent is limited and use of these soils can be constrained by external factors such as economics, erosion, natural and human induced hazards, animal, and plant pests

UFD-P7 – Rural areas

The management of rural areas:

(3) ~~enables~~ prioritises **food and fibre production** [emphasis added] ~~primary production particularly on land or soils within areas identified as highly productive land in accordance with LF-LS-P19.~~

### Description of the region

33. Responding to a submission of HortNZ and others, the s42A author recommends a change to the Description of the Region to introduce the following sentence:

*Otago's economy centres around construction, primary production agriculture, tourism, mineral—mining, and education. The construction industry is a major contributor to employment numbers in Otago, supported by the region's population growth. The primary production sector is a source of revenue and employment for the districts and the wider region. Otago's farms are also a key contributor to the national food supply network.* [emphasis added]. The University of Otago enrolls approximately 20,000 students each year from around New Zealand and internationally, contributing to annual population spikes in Dunedin and significantly boosting the economy. Tourism ~~has~~ also ~~has had~~ a significant impact on the regional economy, contributing about a quarter of the region's total gross domestic product. This is the highest of any region in New Zealand, and primarily concentrated in the Queenstown Lakes District.<sup>5</sup>

34. I agree with and support the s42A recommended amendment. As noted by the s42A author, and clarified in the evidence of HortNZ, the primary production sector is a contributor to regional GDP. Additionally, as identified in the evidence of HortNZ, food production has specific values for human health and Otago has national significance in the food supply network.

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<sup>5</sup> Above, at 20.

## How the policy statement works

35. In the discussion on *Cross-Boundary Matters*, HortNZ sought to have water inserted into the list of Otago's cross-boundary matters, as a number of rivers within Otago cross jurisdictional boundaries, for the example the Clutha River runs through three of the five Territorial Authorities in Otago.
36. I agree with the s42A author that this would be a useful addition, expressed as follows:
- resources that cross local authority boundaries which must be managed in a uniform manner, such as water, outstanding natural features, outstanding natural landscapes and significant natural areas;*<sup>6</sup>
37. HortNZ raised an additional request to amend the text to identify that cross-boundary matters include administrative or operational constraints for activities and increased cost for people where consents might be required.
38. I agree with the s42A author that the issue is sufficiently covered, noting also that the section recognises that there may be differences in policies or methods across plans. This can be an administrative or operational frustration for rural production that operate across regional and territorial boundaries particularly as part of rotational growing systems.

## HORTNZ SUBMISSION AND FURTHER SUBMISSIONS: INTERPRETATION

### New Definition Essential Human Health

39. The submission of HortNZ sought a new definition as follows:
- Essential human health: means the physiological needs of humans, it includes safe drinking water and sanitation, nutritious food, adequate shelter and warmth.*
40. The term to then be referenced in the SRMR (Introduction, SRMR-I1, SRMR-I11 and a new SRMR), and IM-M4. The HortNZ submission points are recommended to not be accepted.
41. The s42A author states that to define 'essential human health' "implies that there is a distinction between 'essential' and 'non-essential', and that there are elements of human health that are less important." Furthermore, the author considers

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<sup>6</sup> Above, at 42.

that defining the term 'human health' would not add greater value in understanding section 5 of the RMA, than what 'human health' does. It may even risk narrowing the focus of achieving human health too much.<sup>7</sup>

42. I agree that under the RMA the matter is understood via section 5. I am not best qualified to comment on what might or might be essential human health and for the purposes of the pORPS I do not think it necessary to define. However, in my opinion food is clearly essential to human health, and human health is a different element to matters of well-being (social, economic and cultural) albeit there is typically a relationship.

### **New Definition Highly Productive Land**

43. The s42A author recommends including a definition of Highly Productive Land as an interim definition to apply before identification of Highly Productive Land has occurred and after identification has occurred.<sup>8</sup> I note that further commentary has been included in the Second Supplementary Evidence (HPL).
44. I acknowledge that there is a risk to other valued Highly Productive Land, not yet identified as such, being lost to inappropriate use or development.
45. This matter is addressed in the evidence of Stuart Ford and Lynette Wharfe for HortNZ.

## **HORTNZ SUBMISSION AND FURTHER SUBMISSIONS: RESOURCE MANAGEMENT OVERVIEW**

### **Introduction**

46. The submission of HortNZ stated that the introduction of pORPS would be improved by noting that the Otago's people and communities rely on the natural resources of the land and 'soils'.
47. I concur with the s42A author that this would be an improvement and provide linkage across the pORPS to the

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<sup>7</sup> Otago Regional Council (2021) Section 42A Report, Proposed Otago Regional Policy Statement, Chapter 3 Definitions and Abbreviations, dated 27 April 2022

<sup>8</sup> Otago Regional Council (2021) Section 42A Report, Proposed Otago Regional Policy Statement, Chapter 9 LF – Land and Freshwater, dated 27 April 2022, at 305, paras 1415 and 1416.



matters covering the importance of soil for food production. The recommended change expressed as follows:

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

48. The submission also considered that food production, food supply and food security have been bundled within the issue statement of economics and that the issue 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.
49. The s42A author rejects the submission on that basis that this level of detail is unnecessary for the issues statement, noting that it is covered more generally by the statements in the first two paragraphs of the Introduction.<sup>9</sup>
50. I don't have the same comfort that this matter is sufficiently covered.
51. The regional value of food production is expressed throughout the policy statement, across the Significant Resource Management Issue statements and specifically in the visions of four of the five Freshwater Management Units (**FMU**):
  - (a) Clutha Mata-au FMU;
  - (b) North Otago FMU;
  - (c) Taieri FMU; and
  - (d) Catlins FMU.
52. While I agree that food production is a matter covered more generally by the statements in the first two paragraphs, the introduction does provide more nuanced statements of particular matters (and activities) and I consider would be

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<sup>9</sup> Otago Regional Council (2021) Section 42A Report, Proposed Otago Regional Policy Statement, Chapter 5: Submissions on Part 2: Resource management overview, dated 4 May 2022 (updated 7 October 2022).

improved with a reference to food production from a social perspective.

53. Certainly, food production and the issues of food supply and food security fall within the opening sentence of paragraph one:

*Otago's people and communities rely on the natural resources that Otago's environment provides to enable their social, economic, and cultural well-being.*

54. Additionally, the second paragraph also rightly identifies that from an economic perspective, natural resources support and are impacted by, agricultural industries.

55. However, I consider that referencing food production provides useful acknowledgement of the issue and linkage through from the description of the region (**Otago's farms are also a key contributor to the national food supply network**) to the response to SMRI for the region and FMU values (noting these are now to be considered as separate processes). I would recommend this is expressed as follows:

*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).*

56. Figure 2 provides a graphical representation of the relationships between natural resources, resource use and strategies. I agree with the s42A report writer that food production is generally covered through the listed activity uses (horticulture, cropping, grazing, fishing, aquaculture).

## **SRMR – I2 – Climate change is ~~likely to~~ will impact our economy and environment**

### SRMR-I2 Statement

57. The submission of HortNZ and others seek reference to climate change impacts on food production systems. The s42A author is of the opinion that this is covered more generally in the Statement by the sentence acknowledging that climate change may affect the number and types of crops and animals that the land can sustain and that no more detail is

needed. An additional statement about not creating barriers to adaptation is also rejected on the basis that this is not a good fit for the issues statement and is more relevant to the response to climate change, to be addressed in other parts of the pORPS.

58. I agree that references to solutions in the issue statement on climate change are not consistent with the intent of this discussion, however I am not as comfortable as the s42A author that the impacts of climate change to food production systems is covered more generally in the Statement.
59. As set out in the evidence of HortNZ the impacts are likely to be wider than affecting the number and types of crops and animals that the land can sustain and affect the very viability of food production systems, threaten food supply and food security needs.
60. Food production systems will need to respond and the pORPS would be improved with explicit recognition of an effect on those systems. I recommend this be reflected as follows:

*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 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 and related food supply and food security needs and the potential for renewable electricity generation.*

61. I agree with the s42A author that an additional statement about not creating barriers to adaptation is not required here but a broader reference to the need for adaption and/or mitigation improves the Issue Statement as this is a climate change impact.

#### SRMR-I2 Context

62. Land use change is an inevitable climate change impact and will also be one of the key responses to the effects of climate change noting that the RMA Amendment Act 2020 requires Councils to have regard to the Emissions Reduction Plan 2022 which includes a focus area on transition to low emissions land use.

63. The context states that *the rate of future climate change depends on how fast greenhouse gas concentrations increase*. The rate of future climate change will be determined by the response to it and land use change has a role in that rate of change. However, I agree with the s42A author that land use change as a response to climate change sits across many sections of the pORPS and it is not a necessary to reference in the Context of SRMR-I2.

SRMR-I2 Impact Snapshot

64. HortNZ sought an explicit reference to the fact that diversification to horticulture presents an opportunity to reduce emissions and support the transition to a low emissions economy. Within an impact snapshot that covers both impacts and opportunities for regional industry in the context of climate change I think this a useful and factual reference to include.
65. This is not a solution to the issue of climate change. As I understand it, land use change is an inevitable climate change impact. I recommend a change as follows:

*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. Diversification to horticulture presents an opportunity to reduce emissions and support the transition to a low emissions economy.*

**SRMR – 17 – Rich and varied biodiversity has been lost or degraded due to human activities and the presence of pests and predators**

66. The submission of HortNZ states that 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. The submission noting that:

*Oddly there is a comment in the impact snapshot on economics as follows: "The economic costs of lost productivity due to pests, erosion and damage to land, are likely to be significant and there is potential for loss of biodiversity to adversely impact on the economy." 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.*

67. As I read the pORPS there is an overlap on this matter between SRMR-13 – Pest species pose an ongoing threat to indigenous biodiversity, economic activities and landscapes and SRMR – 17 – Rich and varied biodiversity has been lost or degraded due to human activities and the presence of pests and predators.
68. In my opinion the matter of biosecurity is better addressed in SRMR-13 and concur with the s42A author that a change to SRMR-17 is required.

**SRMR – 111 – Cumulative impacts and resilience – the environmental costs of our activities in Otago are adding up with tipping points potentially being reached**

69. While supporting the issue Statement and Context on cumulative impacts and resilience, HortNZ sought changes to note the need for essential human health.
70. The s42A author is of the opinion that this is not necessary as this is covered more generally by the reference to 'environmental, economic and social well-being'. I disagree and consider people and communities health needs are separate (but related) matters to well-beings and the amendments sought would improve the plan within the issue statement of cumulative impacts and resilience. The recommended change as follows:

*How and where we currently live, and the activities we undertake, are 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 personal and community well-being and health and safety, all while protecting our natural environment. Consideration must include the rate at which change or adaptation is required to occur, the nature of place-specific and activity-specific responses required, and the timeframes for action.*

**CONCLUSION**

71. The submission of HortNZ is broadly supported of the pORPS and the Section 42A response to submissions with suggested amendments to improve plan interpretation and administration. I agree that the pORPS is an appropriate response to the resource management issues in Otago and

consider that except for improvements that could be made to some provisions to clarify food production values, the pORPS is the most appropriate way to achieve the purpose of the Act.

**Vance Hodgson**

**23 November 2022**