

**BEFORE THE HEARINGS PANEL
AT THE COUNCIL CHAMBERS AT TIMARU DISTRICT COUNCIL IN
TIMARU**

IN THE MATTER of the Resource Management Act 1991
(the Act)

AND

IN THE MATTER Hearing A - Overarching Matters, Part 1 -
Introduction, General Provisions, General
Definitions and High-Level Strategic
Directions

**STATEMENT OF EVIDENCE OF SARAH CAMERON FOR HORTICULTURE
NEW ZEALAND**

12 April 2024

INTRODUCTION

Qualifications and Experience

1. My name is Sarah Cameron. I am a Senior Environmental Policy Advisor at Horticulture New Zealand (HortNZ). I am involved in HortNZ's national, regional, and district planning processes across New Zealand. I have been in this role since 2 May 2022.
2. I have over five years of experience in environmental policy. During this time, I have worked for the horticulture industry. I am an associate member of the New Zealand Planning Institute.
3. Since beginning my role at HortNZ, I have met with growers across New Zealand to better understand their horticultural operations and how resource management issues impact them.
4. I have led involvement and consultation on the development of District Plans across horticulture growing regions in New Zealand

INVOLVEMENT IN THE PROCEEDINGS

5. I have policy oversight for the Canterbury region and the role of HortNZ lead in these proceedings.

PURPOSE AND SCOPE

6. HortNZ is the industry body for the horticulture sector, representing growers who pay levies on fruit and vegetables sold either directly or through a post-harvest operator, as set out in the Commodity Levies (Vegetables and Fruit) Order 2013.
7. My evidence describes the horticulture sector in Timaru and a summary of HortNZ's position on Hearing A and the section 42A office reports:
 - Proposed Timaru District Plan: Strategic Directions and Urban Form and Development Chapters, dated 8 May 2024.
 - Proposed Timaru District Plan: Part 1 - Introduction and General Definitions, dated 8 May 2024.

HORTICULTURE IN TIMARU

8. There are approximately 30 existing commercial growing operations in the Timaru District.
9. These include a variety of both fruit and vegetable crops. Crops grown include; strawberries, potatoes, carrots, peas, onions, blackcurrants, redcurrants, brassica, cherries, pumpkin, lettuce, corn, garlic, apples, pears, stone fruit, raspberries, and asparagus.
10. Most of the growing in the Timaru District is located in the General Rural Zone (GRUZ) within or close to the townships of Pleasant Point, Temuka, Arundel, Seadown, Pareora, Geraldine, Orari, Winchester, Clandeboye, Rangitata and Levels.
11. The majority of the uncovered growing operations are located on highly productive land (HPL) and are soil reliant land-based primary production activities.
12. Supporting the wide variety of growing operations, both for fresh consumption and for processing in the Timaru district, there are a number of regionally/nationally significant vegetable processing facilities in the Timaru District such as McCains potato processing and JPNZ juice processors. These facilities are strategically located to serve this important food producing district and surrounding regional production systems.
13. Attractive environmental conditions are encouraging significant change and expansion in growing systems in the district which is likely to lead to an increase in the growing footprint, changes in crop type, jobs and economic growth.

HEARING A: STRATEGIC DIRECTIONS AND URBAN FORM AND DEVELOPMENT CHAPTERS

14. The s42A report to the committee on *Strategic Directions and Urban Form and Development Chapters* considered three submission points of HortNZ:
 - Hort NZ [245.38]
 - Hort NZ [245.40]
 - Hort NZ [245.41]

15. These are considered below. In summary, HortNZ supports the s42A Report writer's recommendations to these submission points.

Hort NZ [245.38]

16. Hort NZ [245.38] supported SD-O3 *Climate Change* but considers it should reference activities as well as community. Hort NZ seeks SD-O3 is amended as follows:

The effects of climate change are recognised and an integrated management approach is adopted, including through:

- i. taking climate change into account in natural hazards management;*
 - ii. enabling the community **and activities** to adapt to climate change;*
 - iii. encouraging efficiency in urban form and settlement patterns.*
17. The s42A report writer agrees with the suggestion and we concur that this would provide clarity.
18. For context to the submission point, diversification to horticulture presents an opportunity to reduce emissions while increasing food production.
19. This has been identified by the Climate Change Commission. '*Ināia tonu nei: a low emissions future for Aotearoa*'.
20. It includes the assumption (in the Demonstration Path) that nationally, 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".
21. Opening up more opportunities for conversion to lower emissions production systems and land uses, including horticulture, is listed as a critical outcome.
22. 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

¹ <https://www.climatecommission.govt.nz/our-work/advice-to-government-topic/inai-a-tonu-nei-a-low-emissions-future-for-aotearoa/>

- required to meet the more ambitious end of the 2050 methane target if new technology does not come through.
23. To enable horticulture growth to continue and increase, a regulatory/policy environment that enables the market to respond is required.
 24. There is a national food producing system that relies on growing vegetables and fruit in pockets of HPL, with good climate and access to freshwater.
 25. New Zealand's existing food production systems are coming under increased pressure from population growth (and competing land use demands reducing availability of HPL), climate change, water concerns, ETS costs and the cost of energy, and the need to improve environmental outcomes.
 26. Horticulture can bring several efficiencies to food production, making it a valuable component of a sustainable and productive food system.

Type	Efficiency
Water	Horticultural practices often allow for precise control of water usage through techniques like drip irrigation, hydroponics, and soil moisture monitoring. This reduces water wastage and helps address water scarcity issues.
Land use	Horticulture typically requires less land compared to traditional agriculture, making it possible to produce high-value crops in smaller areas.
Energy	Greenhouses and other horticultural systems can optimise energy utilisation for heating, cooling, and lighting, resulting in decreased energy consumption per unit of crop produced
Crop yields	Compared to agriculture, horticulture can provide better yields per unit of land since it frequently concentrates on high-value crops. This may result in greater food production with less harm to the environment.
Erosion	Horticulture can assist in reducing soil erosion and enhancing soil health by employing strategies like mulching and cover crops.

Climate resilient	Horticulture research can lead to the development of crop varieties that are more resilient to climate change, helping to ensure food security in changing conditions.
Water and Soil Quality	Horticultural practices that focus on organic farming and reduced chemical use can improve water quality by minimising runoff of pollutants and enhance soil health through the addition of organic matter.

28. Recognising horticulture as a low emissions land use option that can produce high yields on less land can bring several economic benefits to a region:

Type	Benefit
Increased Productivity	Horticultural practices often result in higher yields per unit of land compared to traditional agriculture. For example, intensive cultivation methods like greenhouse farming or vertical farming can produce crops year-round, optimising land use and maximising productivity. Increased yields can lead to higher incomes for growers which in turn supports local supply chains.
Diversification	Recognising horticulture's potential encourages diversification. Diversification can reduce a district's reliance on a single industry which can be vulnerable to price fluctuations and market volatility. A more diverse horticultural portfolio can enhance economic resilience.

Job creation	Horticulture often requires more labour-intensive practices, especially in smaller-scale or specialty crop production. This can lead to the creation of more jobs which can help reduce unemployment rates and stimulate local economies.
Innovation and Technology	Recognizing horticulture's importance can drive investments in research, innovation, and technology adoption within the sector. This can lead to the development of advanced farming techniques, improved crop varieties, and more efficient resource management, which can enhance productivity and competitiveness.
Rural Development	By promoting horticulture as a sustainable land use option, regions can encourage rural development. This includes investments in rural infrastructure, such as irrigation systems, cold storage facilities, and transportation networks, which not only benefit horticulture but also support other sectors of the economy.
Improved Resilience to Climate Change	Horticultural practices can be adapted to changing climate conditions more easily than some other forms of agriculture. Regions that recognize this can build resilience to climate change, reducing the economic risks associated with extreme weather

	events and shifting growing seasons.
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29. Overall, horticulture is essential to the production of sustainable food and low emissions land use because it minimises environmental effects while producing a variety of nutrient-dense foods to support New Zealand domestic food supply and meeting overseas market demands.

Hort BZ [245.40]

30. Hort NZ [245.40] supported the scope of SD-O9 *Rural Areas* and the outcomes it seeks to achieve, but sought the following amendments:
31. A range of primarily productive activities are enabled in the rural environment to enable the ongoing use of land for primary production for present and future generations, while:
- i. protecting ~~versatile soils~~ **highly productive land** for productive uses;
 - ii. ~~managing the adverse effects of intensive activities on sensitive activities;~~
 - iii. managing the adverse effects of new sensitive activities on primary production;
- [...]
32. The s42A Report writer recommends² I have recommended that the word 'production' is added to clause (ii) to help clarify what are intensive activities. HortNZ supports the recommendation to assist with plan interpretation.
33. The s42A Report writer recommends³ also agrees that changing the reference to highly productive land (HPL) is more appropriate as this is the wording as used in the NPS-HPL 2022. HortNZ supports the recommendation and concurs with the report writer that this change would need to be replicated in the versatile soils chapter.

² Officer's Report: Strategic Directions & Urban Form and Development. Paragraph 114.

³ Officer's Report: Strategic Directions & Urban Form and Development. Paragraph 239.

Hort NZ [245.41]

34. Hort NZ [245.41] supported UFD-O1 *Settlement Patterns* in terms of the outcome sought of a consolidated and integrated settlement pattern and again noted that changing the reference to HPL in the objective, would align with the definition of HPL in the NPS-HPL 2022.
35. HortNZ supports the recommendation⁴ to make this change as follows:

vii. *minimises the loss of ~~versatile soils~~ **highly productive land***

HEARING A: PART 1 AND OVERARCHING MATTERS

36. The s42A report to the committee on *Part 1 and Overarching Matters* considered the following submission points of HortNZ:
- Hort NZ [245.3]
 - Hort NZ [245.25]
 - Hort NZ [245.27]
 - Hort NZ [245.35]
 - Hort NZ [245.33]
 - Hort NZ [245.36]
37. These are considered below. In summary, HortNZ supports the s42A Report writer's recommendations to these submission points.

Hort NZ [245.3]

38. Hort NZ [245.3] seek amendments to the rural areas section of the description of the district chapter to align with the NPS-HPL, particularly in reference to HPL.
39. It is the opinion of the s42 Report writer⁵, that giving effect to the requirements of the NPS-HPL is best considered within the context of the versatile soils chapter, acknowledging that the Description of the district chapter could be amended

⁴ Officer's Report: Strategic Directions & Urban Form and Development. Paragraph 286.

⁵ Officer's Report: Part 1 and Overarching Matters. Paragraph 94.

concurrently with the versatile soils chapter to ensure consistency across the proposed plan.

40. Hort NZ agrees with the deferral noting that consistency with the recommendations for s42A report to the committee on *Strategic Directions and Urban Form and Development Chapters*, would necessitate changes to the rural areas section of the description of the district.

Hort NZ [245.25]

41. Hort NZ [245.25] (and other submitters) sought to add various activities to the list of *sensitive activities*; as follows:
- Residential units (Hort NZ [245.25]);
 - Residential visitor accommodation (Hort NZ [245.25], NZ Pork [247.8]);
 - Supported residential care activity (Hort NZ [245.25], NZ Pork [247.8]);
 - Recreation activities (Hort NZ [245.25], NZ Pork [247.8]);
 - Educational activities (NZ Pork [247.8]);
 - Retirement home (KiwiRail [187.14]);
 - Community facility (KiwiRail [187.14]);
42. On review and though the helpful explanation of the s42A Report writer⁶, HortNZ agrees that it is not necessary to include the additional listed activities of 'supported residential care activity' or 'residential visitor accommodation', within the definition of *sensitive activities*. These activities nest within the current definition framework and are *sensitive activities*.
43. Some minor amendments that might assist plan interpretation and administration of the plan by linking clearly to corresponding nested definitions include:
- *Educational*al facilities and preschools;
 - ~~Guest & v~~Visitor accommodation;
44. As identified by the s42A Report writer, 'recreation activities' are considered as *sensitive activity* in the context of GRUZ—R11 but limited to situations of 'organised sports'. There are

⁶ Officer's Report: Part 1 and Overarching Matters. Paragraphs 218-225.

also applicable setbacks for buildings and structures associated with any recreation activity. HortNZ is comfortable with the planning response but highlights no definition of 'organised sports' which appears in single quotation marks to highlight the term - so we assume the ordinary meaning of 'organised sports' would apply.

45. Recreational activities can be an uneasy fit in the rural zones and an area where conflict with primary production is likely. Those conflicts extend to animal welfare, biosecurity, safety, noise, fires, fireworks, people, traffic. This is an activity that could introduce people into the rural environment seeking active or passive recreational enjoyment and that expectation could clash with a primary production activity.
46. Applying a sensitive activity setback provides a layer of control but the risk of conflict remains.

Hort NZ [245.27]

47. Hort NZ [245.27] sought to include recognition in the definition of the importance of shelterbelts in managing spray drifts. On review, HortNZ agrees with the s42A Report writer⁷ that shelterbelts serve a variety of purposes and no change is required.

Hort NZ [245.35]

48. Hort NZ [245.35] requested a definition for 'activities sensitive to transmission lines'. On review, HortNZ agrees with the s42A Report writer⁸ that the definition of 'sensitive activity' already aligns with the NPSET and no additional definition is required.

Hort NZ [245.33]

49. Hort NZ [245.33] sought to include a definition for 'Greenhouses'. The term appears as follows:

*ARTIFICIAL CROP PROTECTION STRUCTURE
means structures with material used to protect crops
and/or enhance growth (excluding **greenhouses**).*

⁷ Officer's Report: Part 1 and Overarching Matters. Paragraph 245.

⁸ Officer's Report: Part 1 and Overarching Matters. Paragraph 252.

El-R27 Buildings or structures within the National Grid Yard

PER-1 In the National Grid Yard:

*3. it is a non-habitable building or structure for primary production in the Rural Zones, including yards for milking/dairy sheds and artificial crop protection structures (but does not include any building for intensive primary production, commercial **greenhouses** or milking/dairy sheds); or*

50. As identified by the s42A Report writer, the addition of a definition does not assist the plan.

Hort NZ [245.36]

51. Hort NZ [245.36] requested that the part 1 national direction instruments section include a reference to the NPS-HPL.
52. The s42A report writer recommends that a reference be included with the added notation that the Timaru District Plan has not been reviewed against this instrument⁹. HortNZ supports the reference being added while noting that the extent to which the proposed plan can give effect to the NPS-HPL will be considered at a future hearing.

CONCLUSION

53. HortNZ supports the s42A Report recommendations.
54. HortNZ is particularly interested in how the NPS-HPL will be managed through the district across both the GRUZ and the plans response to soil-reliant and non-soil reliant land-based primary production and supporting activities.

Sarah Cameron

⁹ Officer's Report: Part 1 and Overarching Matters. Paragraph 322.

12 April 2024