

**BEFORE THE HEARINGS PANEL APPOINTED BY TIMARU DISTRICT COUNCIL**

**IN THE MATTER**

of the Resource Management Act 1991  
**(the Act)**

AND

**IN THE MATTER**

of hearing of submissions on The Proposed  
Timaru District Plan

Hearing Stream E: Infrastructure, Subdivision and  
Cultural Values

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**INDUSTRY STATEMENT OF CHARLOTTE WRIGHT  
FOR HORTICULTURE NEW ZEALAND**

**7 January 2025**

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## **PURPOSE AND SCOPE OF EVIDENCE**

1. This statement responds to the Section 42A report recommendations in regard to the Horticulture NZ submission and further submissions to be considered at hearing E Infrastructure, Subdivision and Cultural Values, specifically:
  - Rural subdivision and land fragmentation
  - Reverse sensitivity

## **INTRODUCTION**

2. 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.
3. On behalf of growers, HortNZ takes a detailed involvement in resource management planning processes as part of its national and regional environmental policy response.
4. My name is Charlotte Wright. I am a Senior Environmental Policy Advisor at Horticulture New Zealand (HortNZ). I am involved in HortNZ's regional, and district planning processes across the South Island. I have been in this role since 25 November 2024.

## **RURAL SUBDIVISION AND LAND FRAGMENTATION**

5. Fragmentation of productive rural land affects the productive potential of that land. These impacts tend to be irreversible.
6. Land fragmentation tends to occur on highly productive land at the rural-urban fringe, where horticultural operations are often located due to proximity of labour supply and markets.
7. Land fragmentation can result in a reduction of the most suitable land for food production, leading to land use intensification and a rise in production costs.
8. I support the council officer's recommendation to require subdivision to avoid, rather than minimize fragmentation of productive land in the General Rural zone.

## **REVERSE SENSITIVITY**

1. The GRUZ and RLZ are characterised by the presence of primary production activities and the associated sights, sounds and smells which accompany these activities.
2. Horticultural operations rely on the use of machinery, structures to support and protect crops, agrichemical and fertiliser application, heavy vehicles to transport produce, and many other activities that may generate a range of effects. These effects are characteristic and part of the landscape and amenity of rural environments.
3. Reverse sensitivity effects grows when occupants of a new activity or use complain about the effects of an existing, lawfully established horticultural activity or use. This can place significant economic burden and operational limitations on the grower reducing their economic viability and social licence to operate.
4. I support the change recommended by the council officer to more explicitly recognize reverse sensitivity in SUB-O1, General subdivision design, as it addresses HortNZ's submission seeking more explicit recognition of reverse sensitivity impacts on land use resulting from new subdivisions.
5. I support the council officer's recommended deletion of 'intensive' from SUB-O3 and SUB-P5 so that effects on horticultural production activities are captured in the consideration of reverse sensitivity effects.

## **CONCLUSION**

6. I support the council officer's recommendations in relation to the above points.
7. It is important the district plan provides for infrastructure and development alongside ensuring continued availability of food, employment opportunities and economic opportunities offered by the district's horticulture operation.

**Charlotte Wright**

**7 January 2025**