

**BEFORE THE HEARING
COMMISSIONERS
AT CROMWELL**

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

AND

IN THE MATTER of the Central Otago District Plan:
Hearing PC14

**SUPPLEMENTARY STATEMENT
BY RACHEL SARAH McCLUNG
FOR HORTICULTURE NEW ZEALAND**

27 May 2020

1. Good Morning. I am Rachel McClung, Environmental Policy Advisor - South Island for Horticulture New Zealand (HortNZ).
2. The HortNZ vision is 'Healthy food for all, forever'. The mission of HortNZ is to create an environment where growers prosper. My role in this hearing is as the HortNZ representative and I am also here in support of our Summerfruit Industry.
3. Today I have with me Ms Lynette Wharfe who prepared planning evidence in support of the HortNZ submission, and also Mr Tim Jones, Chair of SummerfruitNZ.
4. I asked Mr Jones to attend the hearing as neither Ms Wharfe or I have been able to undertake recent site visits, and certainly not since the circulation of the proponent's evidence. Mr Jones is very familiar with the Ripponvale area and production matters and maybe able to assist the hearing panel where we cannot.
5. As stated when I submitted our written evidence to Council, Mr Roger Gibson is unable to attend the hearing today. This has been unavoidable due to other work commitments that had been postponed due to Covid-19 restrictions. If the hearing panel has questions regarding his evidence, then they can be put to Mr Gibson at a later date. He is currently 'out of range' until Friday this week, weather dependant. He could be available for the panel next week if needed.
6. I wish to point out that there have been numerous challenges for our involvement throughout this process, including;
 - submissions being due the week before Christmas, during harvest
 - bare minimum notification to submitters of the hearing date during the Covid-19 lockdown
 - confusion over the hearing notification from Council, having firstly been notified of a resource consent hearing
 - inability to undertake site visits (due to Covid-19)

- the late circulation of the proponent's evidence, and
 - new matters arising in the proponent's late evidence (e.g. Production evidence of Mr Edwards)
7. No additional time was given to submitters to prepare their evidence in lieu of the late circulation. Therefore, submitters had only four and a half working days to respond. This also coincided with the first weekend when the Covid 19 - Level 2 came into force, with the relaxation of the restrictions being the main focus of everyone. All of this has meant that HortNZ, and other submitters, have been put in a disadvantaged position.
8. Furthermore, yesterday we were provided with a masterplan less than 24 hours before our hearing appearance, again disadvantaging our ability to fully consider matters.
9. For clarity, we understand that in its presentation to the panel, the proponent has made changes to the notified proposal. Ms Wharfe has taken these amendments into consideration as far as practicable, within the timeframes provided, and will share her position with the hearing panel shortly.
10. I simply raise these matters so that the hearing panel can understand the full context of constraints on submitters involvement to this plan change. Having said this, we will assist the hearing panel the best we can.

Concerns

11. Our key concerns are:
- the ability of established growing operations to continue to lawfully operate in the vicinity of the proposed residential development – reverse sensitivity issues; and
 - soil is a finite resource - once it is developed for residential use, it is lost for meaningful productive use.
12. The amendments to the proposal (by the proponent) do not alleviate our concerns, and raise a new concern. The proposal to identify *'an area comprising at least 50% of the site to be utilized for*

*horticulture or agriculture activity*¹ presents a further risk to our established industry. If not managed correctly, areas of horticulture and/or agriculture can host pests and diseases which can then spread and cause issues for neighbouring operations. In addition, horticulture is labour intensive and small horticultural operations are not generally very productive and it is often difficult to obtain the knowledge and find the time to manage it correctly.

13. By way of example, currently, there are neglected apple blocks in the area hosting Codling Moth in numbers so large, that they are being seen in cherry blocks, which are not hosts to this pest. Codling Moth are a huge problem for pip fruit such as apples.
14. Mr Gibson provides an expert opinion on the allotment size and practical use for production. He states that '*to enable blocks which allow meaningful utilisation of these outstanding soils, I would see 4-8ha as a more reasonable size*²'. Therefore, it is the view of HortNZ that what is proposed is nothing more than amenity planting, which may host pests and diseases and threaten the productivity of our established industry. There are no realistic prospects that horticultural or agricultural activities could establish on the blocks created.
15. In addition, it is highly likely that there will be reverse sensitivity effects within the development with the requirements for 50% of each lot being used for primary production. With residential neighbours so close, it is difficult to practice good management such as a spray regime.
16. Just to be clear, HortNZ is not advocating for the Shannon Farm land to be put into horticultural crops now. Our position is that it could be used for any rural use provided for under the operative District Plan, i.e. The Status Quo. Our issue is not with rural uses, it is with the proposed residential uses.

¹ NZCherry Corp Legal Statement, Para 8(c)

² Statement of Evidence of Mr Gibson, para 10.20

17. Furthermore, research and development are important components of the horticulture industry, as this industry is ever evolving.
18. Research into new crops and varieties is a priority for the industry, as growers are aware of potential industry risks, including relying on a single variety or crop. For example; in the last planting season Webbs Orchard (located on SH6 just northwest of Cromwell) planted a new apricot variety as a trial for the domestic market. This has been done in conjunction with work undertaken by Plant and Food research³.
19. This research and trial have been undertaken as it is understood by the industry that old apricot varieties have fallen out of favour with the consumer and that access to the Australian market (being the biggest importer of NZ apricots) is becoming more and more constrained. Therefore, replacing old varieties can be important for a grower to remain competitive.
20. To us, it is important to consider the finite nature of New Zealand's soil resource; the significant investment in growing infrastructure that exists in the Cromwell Basin, and to see this in the intergenerational context of sustainable management and 'Healthy food for all, forever'.
21. Summerfruit in Central Otago is a significant, valuable and an evolving industry. It is very reliant on the operative District Plan to protect and enable growing operations, now and in the future.
22. Ms Wharfe will discuss why avoidance is the best measure in this instance.

Conclusion

23. Our main concern remains the ability of established growing operations to continue to lawfully operate in the vicinity of the residential development proposed.

³ <https://www.plantandfood.co.nz/page/our-research/breeding-genomics/key-crops/summerfruit/>

24. Even with the amendments to the proposal, it remains our view that PC14 must be refused.
25. I will hand it over to Ms Wharfe to explain her expert position and summarise her key points, after which we would be happy to answer any questions the hearing panel may have.

Rachel McClung
27 May 2020