

**BEFORE THE COMMISSIONERS
AT HAMILTON**

IN THE MATTER

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

AND

IN THE MATTER

of the hearing of submissions on The
Proposed Waikato Regional Plan Change
1 – Waikato and Waipa River
Catchments:

CLOSING SUBMISSIONS FOR HORTICULTURE NEW ZEALAND

26 SEPTEMBER 2019



ATKINS | HOLM | MAJUREY

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INTRODUCTION

1. The purpose of this closing is respond to the matters that were raised at the Block 3 presentation of Horticulture New Zealand's (**HortNZ**) case.
2. Included with this closing is:
 - (a) A consolidated track change version of PC1;
 - (b) A mock of an application for a resource consent that was discussed during Block 3.

CONSOLIDATE TRACK CHANGE VERSION OF PC1

3. The consolidated track change version of PC1 includes all the HortNZ has requested throughout all the hearings – ie Blocks, 1, 2 and particularly 3.
4. The changes requested by HortNZ are largely self-explanatory and were explained by the witness team in Block 3. Therefore, it is not proposed to explain those changes further here. Suffice to say the changes are intended to provide an appropriate regulatory pathway for commercial vegetable production (**CVP**) in the region. There are also refinements sought to the regulatory framework to ensure low intensity horticulture production systems are adequately provided for.

MOCK RESOURCE CONSENT APPLICATION

5. The mock resource consent application includes an assessment of effects and proposed conditions. The document references the various plans and other material that Mr Andrew Barber provided to you at the hearing. That material is not re-included here.
6. The proposed conditions address all the matters raised during Block 3 around the requirement to have a current FEP and a 'use it or lose it' condition.

CONCLUSION

7. HortNZ wishes to thank the Commissioners for their consideration of its case and the thoughtful and helpful manner in which you allowed the case to proceed. The approach taken here is likely to be replicated elsewhere and

will also form the basis of HortNZ's comments on the Government's Essential Freshwater package.

DATE: 26 September 2019



Helen Atkins

Counsel for the Horticulture New Zealand