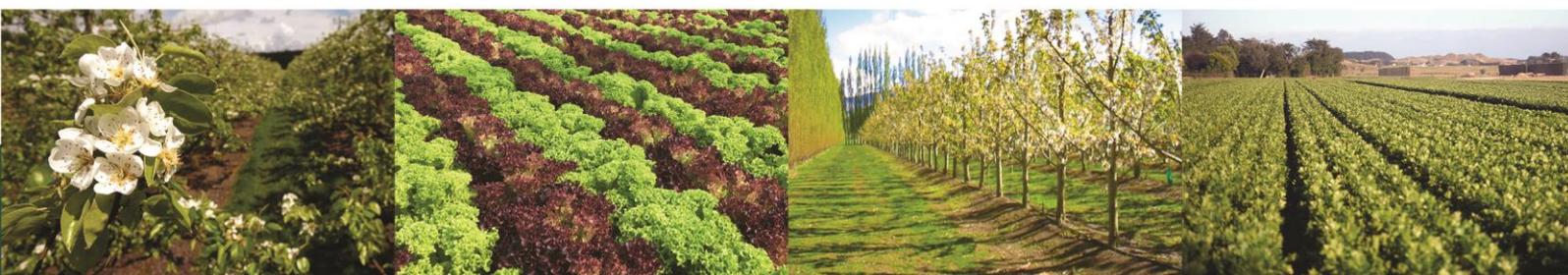


FURTHER SUBMISSION ON PROPOSED NEW PLYMOUTH DISTRICT PLAN

25 August 2020

TO: New Plymouth District Council

NAME OF SUBMITTER: Horticulture New Zealand



CONTACT FOR SERVICE:

Jordyn Landers
Environmental Policy Advisor
Horticulture New Zealand
PO Box 10-232 WELLINGTON
Ph: 027 542 7783
Email: jordyn.landernz@hortnz.com

FURTHER SUBMISSION ON PROPOSED NEW PLYMOUTH DISTRICT PLAN

1. Horticulture New Zealand's (HortNZ) further submissions are outlined in the attached Table 1.
2. HortNZ represents commercial fruit and vegetable growers in New Plymouth District, so represents a relevant aspect of the public interest.
3. HortNZ is not a trade competitor and could not gain any advantage in trade competition through this further submission.
4. HortNZ wishes **to be heard** in support of its further submissions.
5. If others make similar submissions, HortNZ **will consider** presenting a joint case with them at the hearing.

Table 1: Further submissions on behalf of HortNZ on submissions to proposed New Plymouth District Plan

Submitter	Sub No.	Plan Provision	Support / oppose	Reason	Decision Sought
Definitions					
New Zealand Pork Industry Board	209.16	Definitions / EARTHWORKS	Support in part	HortNZ's submission sought specific provisions to enable a biosecurity response (through a specific objective, policy and rules). However, if the same outcome could be achieved through definitions this would also be supported – noting however that the definition of earthworks is defined in the National Planning Standards.	Allow in part (the intent of the submitter to provide for biosecurity response)
Federated Farmers	564.25	Definitions / MAINTENANCE AND REPAIR	Support	HortNZ supports the definition for maintenance and repair excluding upgrading.	Allow submission (retain the definition as notified)
Federated Farmers	564.67	Definitions / WETLAND	Support	HortNZ support refinement of the wetland definition – to align more closely with the natural wetland definition in the recently released NPSFM.	Allow submission
Urban form and development					
Trustpower Limited	544.31	UFD / Strategic Objectives / UFD-24	Oppose in part	The submitter seeks to replace 'protect and maintained' with "recognised". This takes away from the outcome sought for the District (that this resource should be protected and maintained).	Disallow submission (retain provision as notified)
Network utilities					
Federated Farmers	564.72	NU / Objectives / NU-O3	Support	Support the focus on managing new incompatible activities, which provides more specific management direction	Allow submission
Federated Farmers	564.71	NU / Policies / NU-P1	Support	The submitter notes that upgrades could cause more than minor adverse effects on landowners and surrounding land uses and that development is an undefined scale.	Allow submission

Transpower New Zealand Limited	565.50	NU / Policies / NU-P6	Oppose	Avoiding “changes to” an activity may be unnecessary restrictive in this context, where this might not result in an adverse effect.	Disallow submission
Vodafone New Zealand Limited	552.32 552.31 552.39 552.34 552.37 552.45 552.46 552.51	NU / Objectives / NU-O3 NU / Policies / NU-P1 NU / Policies / NU-P4 NU / Policies / NU-P5 NU / Policies / NU-P8 NU / Rules / NU-R3 NU / Rules / NU-R3 NU / Rules / NU-R15	Oppose	The “dNPS-NU” referred to does not have any statutory weight, has not been subject to public consultation (or as we understand it being progressed by MfE). We are concerns that these provisions afford network utilities ‘absolute’ protection where this may not be appropriate. The proposal also makes a pre-emptive effects assessment (that effects are “typically insignificant...”) which may not be the case, particularly in the context of upgrading.	Disallow submission
Hazardous Substances					
Taranaki Energy Watch Incorporated	543.29	HAZS	Support in part/ oppose in part	We support the general approach of the plan, in that it focuses on Significant Hazardous Facilities. Amendments sought by the submitter should be limited in their application to petroleum exploration and petroleum production facilities.	Allow in part
Waterbodies					
Queen Elizabeth the Second National Trust	499.14	WB / Rules / WB-R4	Oppose	A 20m setback from any waterbody is not an efficient planning provision. The submitter references consistency with the consistency with the water quality provisions in the NPS for Freshwater Management – these setbacks are not prescribed in the NPSFM.	Disallow submission (retain provisions as notified)
RPROZ					
The Ministry of Education	518.24	RPROZ / Rules / New rule	Oppose in part	While schools do feature in the rural environment – the establishment of new facilities as a permitted activity does not enable a full effects assessment to be undertaken.	Disallow submission