

**BEFORE THE HEARING COMMISSIONERS**

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

**IN THE MATTER** of Variation 1 to the Proposed Canterbury  
Land and Water Regional Plan

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**MEMORANDUM REGARDING CORRECTIONS TO EVIDENCE FOR  
HORTICULTURE NEW ZEALAND**

**30 NOVEMBER 2020**

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## **MAY IT PLEASE THE COMMISSIONERS:**

### **INTRODUCTION**

1. The purpose of this memorandum is to record the minor corrections to the evidence in chief (**EIC**) filed on 17 July 2020 and the rebuttal evidence filed on 15 September 2020 on behalf of Horticulture New Zealand's (**HortNZ**).
2. The statements of evidence that are addressed are those of:
  - (a) Ms Rachel McClung EIC dated 17 July;
  - (b) Mr Vance Hodgson EIC dated 17 July;
  - (c) Mr Tom Nation EIC dated 17 July;
  - (d) Mr Vance Hodgson Rebuttal dated 15 September.
3. We apologise for any confusion that this may have caused.
4. As a result, there is a consequential amendment to the legal submissions and PowerPoint presentation filed last Wednesday that is also addressed in this memorandum.

### **MS MCCLUNG – EIC**

#### **Paragraph 55**

5. The graph “NZGAP Certification Trends (grower numbers) Canterbury Region” do not have correct year labels. Where there is a “0” below the zero line of the graph and in the red boxes, these should show the years – starting at 2016 on the left through to 2020 on the right.

### **MR HODGSON - EIC**

#### **Paragraph 34**

6. This second sentence of this paragraph needs amending to delete the superfluous 'is' as follows:

... I agree that this appears to be the case and it is, therefore, ~~is~~ important that PC7 does not....

#### **Paragraph 51**

7. Subparagraph (a) need amending to change 0.5ha to 5ha as follows:
  - (a) A permitted activity pathway for CVG on ~~0.5~~ha or less (Rule 5.42CA);

### Paragraph 65

8. The last sentence of paragraph 65 needs amending to change the word 'extend' to 'extent' as follows:

... This will ensure the real ~~extend~~ extent of CVG is appropriately covered.

### MR HODGSON - REBUTTAL

#### Paragraph 16

9. In paragraph 16 there is a missing "A" after 'Policy 4.36" as follows:

... Rather than deleting Part (d) of Policy 4.36<sup>A</sup> I suggest it could be amended to:

### MR NATION - EIC

10. Paragraph 30 of Mr Nation's evidence incorrectly refers to the figure of 0.05% which refers to the earlier submitted growth area of 600ha. The correct figure is 0.08% as follows:

The nitrogen load increase required for 1000 ha of expansion is approximately 0.08% based on the most intensive rotation **(Table 3, Appendix 3)**.

11. The mistaken percentage has also been replicated in Table 3 of Appendix 3. Therefore, Table 3 in Appendix 3 should be replaced with the following (noting it is the last row that has changed):

Horticulture Rotation	Nitrogen load increase per sub catchment	Total area of expansion (ha) for all sub catchments within PC7
Green Vegetable	1%	16926.2
	0.5%	8463.1
Root Vegetable	1%	35031.2
	0.5%	17515.6
Intensive Vegetable	1%	20412.6
	0.5%	10206.3
Intensive Vegetable with Fallow	1%	13045.3
	0.5%	6522.7
	<u>0.08%</u>	<u>1043.6</u>

12. For completeness we note that the same mistake appears in Mr Nation's section of the presentation PowerPoint submitted

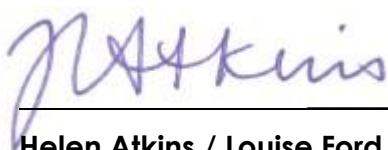
last Wednesday. A correction has been made to this and the correct version has been provided to the Hearings Administrator. The relevant page is attached to this memorandum.

### **LEGAL SUBMISSIONS**

13. At paragraph 19 of the legal submissions reference is made to Mr Nation's paragraph 30. With the amendment to Mr Nation's evidence the legal submissions now need amending as follows:

In relation to the expansion Mr Nation concluded that the nitrogen load increase required for 1000ha of expansion is approximately 0.05~~8~~<sup>8</sup>%, based on the most intensive crop rotation.

**DATE: 30 November 2020**



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**Helen Atkins / Louise Ford**

Counsel for Horticulture New Zealand

# Future domestic demand – scenario b)

- 1000ha of additional horticultural land required to provide for population increase by 2043.
- HortNZ are seeking a new restricted discretionary rule to allow for the expansion of the CVP area.
- Approximately 0.08% nitrogen load increase to meet the 1000ha required for expansion in the most intensive rotation.

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