

SUBMISSION ON

Whanganui District Plan PC60

21 June 2023

To: Whanganui District Council

Name of Submitter: Horticulture New Zealand

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OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Submission

Our submission

Horticulture New Zealand (HortNZ) thanks Whanganui District Council for the opportunity to submit on Plan Change 60 to the Whanganui District Plan and welcomes any opportunity to continue to work with Whanganui District Council and to discuss our submission.

HortNZ could not gain an advantage in trade competition through this submission.

HortNZ wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruit, and vegetables. The horticultural sector provides over 40,000 jobs.

There is approximately, 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain; and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.

Submission

1. Horticulture in Whanganui

The Whanganui District is in a period of active horticultural growth. The district currently has 16 growers, with approximately 130 ha of horticultural land, including 101 ha of kiwifruit.¹ Horticultural crops include kiwifruit, avocados, berries, pears, citrus, and both indoor and outdoor vegetables. Further expansion in kiwifruit and berries is expected in coming years.

Apata Packhouse has actively sought more land for kiwifruit expansion in Whanganui, citing the flat land, free-draining soils and suitable climate.² Now they're helping new growers kickstart and manage their orchards.^{3,4}

Predicted climate change impacts on Whanganui could further improve growing conditions in the region, allowing for more horticultural expansion. Projections show that the district will experience warmer temperatures, a longer growing season, and fewer frosts, which all improve conditions for growing.⁵

2. Highly Productive Land

HortNZ supports Whanganui District Council's efforts to align the District Plan with the NPS-HPL. It is critical that highly productive land is protected for future generations from the trend of cumulative loss to urban and lifestyle development. Reverse sensitivity and competition for natural resources with urban communities are putting fruit and vegetable production at risk.

Protection of productive land should extend beyond Classes 1, 2, and 3 identified in the National Policy Statement for Highly Productive Land (NPS-HPL) because Class 4 land can still be used for high value horticultural production. While soil quality is especially important for growing, favourable climate, flat land, and access to transportation networks are all key considerations for growing areas.

We also consider that the district plan should reference "highly productive land" rather than "productive land" to make clear the connection to the NPS-HPL.

¹ NZGAP, Zespri

² [Whanganui industry picked to grow - NZ Herald](#), 19/07/21. Accessed online 20/06/23.

³ [Weather station data helps Whanganui kiwifruit farm go from strength to strength in tricky conditions - NZ Herald](#), 05/05/23. Accessed online 20/06/23.

⁴ [Sisters plant kiwifruit orchard on the old Whanganui family farm - NZ Herald](#), 08/10/20. Accessed online 20/06/23.

⁵ [Climate change projections for the Manawatu-Whanganui region | Ministry for the Environment](#)

Submission on Plan Change 60 to the Whanganui District Plan

Without limiting the generality of the above, HortNZ seeks the following decisions on Plan Change 60 to the Whanganui District Plan, as set out below, or alternative amendments to address the substance of the concerns raised in this submission and any consequential amendments required to address the concerns raised in this submission.

Additions are indicated by bolded underline, and deletions by strikethrough text.

Provision	Support/oppose	Reason	Decision sought
SUB-R2	Support in part.	<p>The district plan should replace all references to “productive land” with “highly productive land” to make clear the connection to the NPS-HPL.</p> <p>HortNZ also seeks that loss of highly productive land is considered in the Rural Lifestyle Zone and Settlement Zone given that productive land is most at risk on the urban-rural fringe.</p> <p>Reverse sensitivity effects could hinder primary production neighbouring these zones.</p>	<p>...Subdivision in the Rural Lifestyle Zone.</p> <p>Council restricts its discretion to:</p> <ol style="list-style-type: none"> The ability of sites to be independently serviced for stormwater and wastewater. Maintain or enhance rural lifestyle character. <u>Loss of highly productive land.</u> <u>Avoid potential reverse sensitivity effects on primary production.</u> <p>7. Subdivision in the Settlement Zone.</p> <p>Council restricts its discretion to:</p> <ol style="list-style-type: none"> The ability of sites to be independently serviced for stormwater and wastewater. The ability of sites to maintain or enhance rural lifestyle character. <u>Loss of highly productive land.</u>

d. Avoid potential reverse sensitivity effects on primary production

8. Subdivision in the Rural Production Zone provided that, for subdivision located within the National Grid Subdivision Corridor the identified Building Platform shall be located outside the National Grid Yard.

Council restricts its discretion to:

a. The ability of sites to:

- i. Be independently serviced for stormwater and wastewater;
- ii. Maintain or enhance rural character and to avoid potential reverse sensitivity;
- iii. **Avoid** loss of **highly** productive land...

9. Subdivision in the Rural Production Zone to create one allotment with a minimum site area of 5000m² and a maximum site area of one hectare site area provided that...

Council restricts its discretion to:

- i. The ability of the development to be serviced by onsite means with regard to effluent and stormwater disposal;
- ii. Impact on the rural character of the surrounding area, and to avoid potential reverse sensitivity;
- iii. Loss of **highly** productive land...

			<p>10. Subdivision in the Rural General Zone provided that, for subdivisions located within the National Grid Subdivision Corridor the identified Building Platform shall be located outside the National Grid Yard.</p> <p>Council restricts its discretion to:</p> <p>a. The ability of sites to:</p> <p>i. Be independently serviced for stormwater and wastewater;</p> <p>ii. Maintain or enhance rural lifestyle character;</p> <p>iii. Avoid loss of highly productive land</p> <p><u>iii. Avoid potential reverse sensitivity effects on primary production.</u></p>
GRUZ-R2	Support	The district plan should replace all references to “productive land” with “highly productive land” to make clear the connection to the NPS-HPL.	<p>1. Any permitted activity which does not comply with a Rural General Zone standard.</p> <p>Council restricts its discretion to:</p> <p>a. The effect of the particular non-compliance on the environment, including the cumulative or combined effect of non-compliances.</p> <p>b. The loss of highly productive land.</p>
RPROZ-O1	Support	Alignment with the NPS-HPL.	Retain as drafted.
RPROZ-O6	Support	Alignment with the NPS-HPL.	Retain as drafted.

RPROZ-P6	Support	Alignment with the NPS-HPL.	Retain as drafted.
RPROZ-R2	Support	<p>The district plan should replace all references to “productive land” with “highly productive land” to make clear the connection to the NPS-HPL.</p> <p>These changes also fix small typos.</p>	<p>1. Any permitted activity which does not comply with a Rural Production Zone standards. Council restricts its discretion to:</p> <p>a. The effect of the particular non-compliance on the environment, including the cumulative or combined effect of non-compliances.</p> <p>2.</p> <p>b. The loss of highly productive land...</p> <p>2. Any building within 20m of the secured yard of a National Grid substation. Council restricts its discretion to:</p> <p>a. Impacts on the operation, maintenance, upgrade and development of the National Grid, including the location and orientation of residential unit and any associated plantings relative to the National Grid substation;</p> <p>b. Compliance with NZECP34:2001; and</p> <p>c. The risk of electrical hazards affecting public or individual safety, and the risk of property damage;;</p> <p>and</p> <p><u>d. the loss of highly productive land.</u></p>