

FURTHER  
SUBMISSION

# Proposed Te Tai o Poutini Plan

## West Coast Combined District Plan

7 June 2023

**To:** Te Tai o Poutini Plan Team

**Name of Submitter:** Horticulture New Zealand

### Contact for Service:

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# OVERVIEW

## Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Further submissions on behalf of HortNZ

## Our submission

Horticulture New Zealand (HortNZ) made a submission on the Proposed Te Tai o Poutini Plan and welcomes any opportunity to continue to work with the Te Tai o Poutini Plan Team and to discuss our submission.

The details of HortNZ's further submissions and decisions we are seeking from Council are set out 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.

# Further Submission

1. Horticulture New Zealand's (HortNZ) further submissions are contained in the attached table below.
2. HortNZ represents commercial fruit and vegetable growers in the West Coast Region, 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.

## Further submission on behalf of HortNZ on the Proposed Te Tai o Poutini Plan

Submitter	Sub #	Plan Section	Plan Provision	Support/ oppose	Decision Requested	Reason
Buller Conservation Group	S552.154	Noise	NOISE - O1	Oppose	Disallow	This addition will make policy unclear.
Buller Conservation Group	S552.185	Rural Lifestyle Zone	Overview	Oppose	Disallow	Primary production is an appropriate use of rural zones.
Buller Conservation Group	S552.213	Natural Features and Landscapes	NFL - P1	Oppose	Disallow	NFL-P1 is necessary to provide for lawful activities that do not adversely affect values which make natural features or landscapes outstanding.
Department of Conservation	S602.031	STRATEGIC DIRECTION	NENV - O4	Support	Allow	

Federated Farmers of New Zealand	S524.003	Interpretation	AGRICULTURAL, PASTORAL AND HORTICULTURAL ACTIVITIES	Support	Allow	
Federated Farmers of New Zealand	S524.007	Interpretation	EXISTING USE RIGHTS	Support	Allow	
Federated Farmers of New Zealand	S524.012	Interpretation	LAWFULLY ESTABLISHED	Support	Allow	
Federated Farmers of New Zealand	S524.016	Interpretation	REVERSE SENSITIVITY	Support	Allow	
Federated Farmers of New Zealand	S524.022	Interpretation	SENSITIVE ACTIVITY	Support	Allow	

Federated Farmers of New Zealand	S524.023	Interpretation	SIGNIFICANT ELECTRICITY DISTRIBUTION LINE	Support	Allow	
Federated Farmers of New Zealand	S524.027	Rural Zones	GRUZ - PREC 5 - Highly Productive Land Precinct Policy	Support	Allow	
Federated Farmers of New Zealand	S524.028	STRATEGIC DIRECTION	Agriculture Strategic Objectives	Support	Allow	<p>Add a definition for highly productive land. The NPSHPL describes HPL and provides for an interim definition until such time as mapping has been undertaken by the regional council.</p> <p>The plan also refers to versatile soils. There should be consistency in usage of terms.</p>

Federated Farmers of New Zealand	S524.030	STRATEGIC DIRECTION	NENV- O1	Support	Allow	
Federated Farmers of New Zealand	S524.033	Energy	ENG - O3	Support	Allow	
Federated Farmers of New Zealand	S524.036	Energy	ENG - P9	Support	Allow	
Federated Farmers of New Zealand	S524.037	Energy	ENG - R6	Support	Allow	
Federated Farmers of New Zealand	S524.038	Energy	ENG - R19	Support	Allow	
Federated Farmers of New Zealand	S524.040	Hazardous Substances	HS - P2	Support	Allow	
Federated Farmers of New Zealand	S524.041	HAZ - Hazards and Risks	NH - O1	Support	Allow	HortNZ supports a risk-based policy approach.
Federated Farmers of New Zealand	S524.050	Sites and Areas of Significance to Māori	SASM - P4	Support	Allow	



Federated Farmers of New Zealand	S524.057	Sites and Areas of Significance to Māori	SASM - R17	Support	Allow	
Federated Farmers of New Zealand	S524.077	Natural Character and Margins of Waterbodies	NC - P2	Support in part	Allow in part	Amend NC-P2 by adding: g) For purpose of farm maintenance or paddock maintenance  HortNZ supports the ability to performance maintenance on-farm.
Federated Farmers of New Zealand	S524.080	Natural Character and Margins of Waterbodies	NC - R2	Support	Allow	
Federated Farmers of New Zealand	S524.099	Light	LIGHT - R4	Support	Allow	
Federated Farmers of New Zealand	S524.105	Rural Zones	Rural Zones Objectives	Support	Allow	

Federated Farmers of New Zealand	S524.120	General Rural Zone	GRUZ - R21	Support in part	Allow in part	<p>Include a new permitted activity rule for Rural industry</p> <p>Conditions: All performance standards for GRUZ-R1 are met.</p> <p>The maximum floor area is 500m2.</p>
Grey District Council	S608.484	How The Plan Works	Precinct	Support	Allow	<p>The phrase "Highly Productive Land" is most closely associated with the National Policy Statement for Highly Productive Land and should be reserved for that context.</p>
Ministry of Education Te Tāhuhu o Te Mātauranga	S456.018	Subdivision	SUB - O2	Oppose in part	Disallow	<p>Oppose the relief sought. Education facilities need to be located in appropriate areas and should not be located in a rural production zone.</p>

New Zealand Agricultural Aviation Association	S166.006	Interpretation	Definitions	Support	Allow	Agricultural aviation activity should be defined, so it can be used in relevant rules relating to the use of aircraft for rural production, biosecurity, and biodiversity activities.
New Zealand Agricultural Aviation Association	S166.018	Natural Character and Margins of Waterbodies	NC - R1	Support	Allow	Amend NC-R1 by adding: 1. k) biosecurity purposes  There should be provision in the rules for the clearance of weeds and pests and for biosecurity purposes within the riparian margins.
New Zealand Agricultural Aviation Association	S166.030	Rural Zones	RURZ - P1	Support	Allow	Support provisions to avoid reverse sensitivity conflicts.

Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S560.003	STRATEGIC DIRECTION	STRATEGIC DIRECTION	Support	Allow	Climate change mitigation and adaptation require strategic planning, so they should be provided for under strategic direction.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S560.004	Natural Hazards	Natural Hazards	Support	Allow	Climate change mitigation and adaptation require strategic planning, so they should be provided for under policy direction.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S560.087	STRATEGIC DIRECTION	AG - O2	Oppose	Disallow	Enabling supportive services and industries for rural production activities is not necessarily opposed to environmental objectives, which are covered extensively elsewhere in the plan.

Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S560.197	Ecosystems and Indigenous Biodiversity	ECO- O2	Oppose	Disallow	Horticulture may be an appropriate use of this land so long as conditions for indigenous vegetation and fauna are maintained or enhanced.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S560.249	Natural Character and Margins of Waterbodies	NC - P2	Oppose	Disallow	Indigenous vegetation removal and earthworks in riparian margins may be necessary for a number of reasons.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S560.253	Natural Character and Margins of Waterbodies	NC - R1	Oppose	Disallow	Indigenous vegetation removal and earthworks in riparian margins may be necessary for a number of reasons.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited	S441.021	Subdivision	SUB - R6	Support	Allow	Support the consideration of potential reverse sensitivity effects.

Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited	S441.037	Noise	NOISE - O3	Support	Allow	Noise is expected in the rural zone. Noise should be consistent with the role and character of the zone.
Silver Fern Farms Limited by its authorised agents Mitchell Daysh Limited	S441.039	Noise	NOISE - P2	Support	Allow	Noise is expected in the rural zone. Noise should be consistent with the role and character of the zone.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora	S190.050	Energy	ENG - P9	Support	Allow	
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora	S190.536	Noise	NOISE - R2	Oppose	Disallow	Retain as drafted.

Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora	S190.931	Rural Zones	RURZ - P2	Oppose	Disallow	New housing activities need to be carefully considered, since they are not appropriate within the rural zone.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio	S620.165	Natural Features and Landscapes	NFL - R8	Support	Allow	HortNZ supports buildings and structures associated with mahinga kai.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio	S620.185	Subdivision	SUB - R6	Support	Allow	
Te Tumu Paeroa - The office of the Māori Trustee	S440.017	Sites and Areas of Significance to Māori	SASM - O2	Support	Allow	Clarify that access to private property will only be granted with agreements with landowners.

Te Tumu Paeroa - The office of the Māori Trustee	S440.027	Ecosystems and Indigenous Biodiversity	ECO - R1	Support in part	Allow in part	ECO-R1 should also provide for the clearance and disturbance of indigenous vegetation for biosecurity reasons.  HortNZ supports the need to clear vegetation for biosecurity purposes.
Te Tumu Paeroa - The office of the Māori Trustee	S440.045	Rural Zones	RURZ - P1	Support	Allow	Profile is a more commonly understood term.
Transpower New Zealand Limited	S299.073	Ecosystems and Indigenous Biodiversity	ECO - P1	Support	Allow	The Councils must map areas of significant indigenous biodiversity within the region to stay in line with the RPS.
Waka Kotahi NZ Transport Agency	S450.118	Subdivision	SUB - P6	Support	Allow	
Waka Kotahi NZ Transport Agency	S450.269	Rural Zones	RURZ - P15	Support	Allow	



Westpower Limited	S547.061	STRATEGIC DIRECTION	NENV - O4	Support	Allow	
Westpower Limited	S547.078	Energy	ENG - O3	Oppose	Disallow	The NPS-ET does not require 'protection' of the National Grid, only that the Grid is 'recognised and provided for.'