

SUBMISSION ON Draft Plan Change 81, Tasman Resource Management Plan

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To: Tasman District Council

Name of Submitter: Horticulture New Zealand

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OVERVIEW

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Our submission

Horticulture New Zealand (HortNZ) thanks Tasman District Council for the opportunity to submit on Draft Plan Change 81 to the Tasman Resource Management Plan and welcomes opportunities to continue to work with Tasman District Council and to discuss our submission.

The details of HortNZ's submission 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.

Submission

1. Horticulture in Tasman

Horticulture is one of the top 3 economic sectors in the Tasman Region, alongside forestry and tourism.¹ The estimated direct value of horticulture in Tasman is around NZD \$500-\$700 million annually. This includes orchard gate returns, processing, packaging, and export logistics. Tasman's horticultural operations provide a range of employment and lifestyle opportunities to the local community. There are also a large number of horticultural support services and industries based within the Tasman region that rely on the various horticultural businesses.

Tasman is a horticulturally diverse region; it is a hub for both fruit and vegetable growing. Growers vary in scale, from small family operations to large scale commercial organisations.

1.1. VEGETABLE GROWING

Commercial vegetable production predominantly occurs on the Waimea Plains, including greenhouse production. Tasman is the second largest vegetable production area in the South Island². The stony soils and unique microclimates in the Waimea plains provide opportunities for vegetable production in cooler winter months. Vegetables grown here are important to the South Island's domestic food supply. The heat of the Ranzau soils is particularly important for winter vegetable supply. Vegetable production on the Waimea plains helps to even out supplies of fresh vegetables in the domestic market across the year, particularly in the South Island where location, climate and sunshine hours makes this challenging in other areas. There are likely to be cost impacts for South Island supply if vegetable production was constrained on these Ranzau soils.

1.2. FRUIT GROWING

Tasman is the second largest pipfruit production area in New Zealand³, and a hub for South Island pipfruit production. Pipfruit grown in other areas in the South Island is picked and transported to Nelson to be prepared and packaged for sale through Tasman based post-harvest facilities. Packhouses, post-harvest facilities and specialist advisory support services are all based in the region. Kiwifruit, the second biggest fruit crop in the region, grows well in the local climate.

¹ [Research-Papers_240924-Horticulture-viticulture_bulletin.pdf](#)

² [Fresh-Facts-2024---Online-Version.pdf](#)

³ [Fresh-Facts-2024---Online-Version.pdf](#)

2. Draft Plan Change 81

2.1. Urban growth and proposed re-zoning

Overall, Horticulture NZ supports Tasman District Council's approach to increasing supply of housing through increasing density in existing residential areas and enabling subdivision within existing township boundaries. HortNZ suggests that rules be added to the plan to also allow a second dwelling on existing rural properties. This would provide another mechanism for building the supply of affordable housing.

2.1.1. HIGHLY PRODUCTIVE LAND

HortNZ is mindful of the need to protect highly productive land, to enable the production of fruit and vegetables and maintain regional benefits for food security, employment, regional economic productivity and contribution to the national economy. For this reason, HortNZ is hesitant to support any re-zoning of rural land currently classified as LUC Class 1,2 or 3.

The National Policy Statement for Highly Productive Land (NPSHPL) seeks to protect highly productive land (HPL) for primary production uses. The objective and policies provide clear avoid policies against inappropriate subdivision, use and development of HPL. There are also specific protection clauses for existing use, productive uses and reverse sensitivity.

The NPSHPL has one Objective: Highly productive land is protected for use in land-based primary production, both now and for future generations. There are nine policies which support the objective. The policies set a clear pathway that HPL is to be protected - urban rezoning, rezoning and development as rural lifestyle and subdivision, are activities to be avoided. Policy 9 also provides for reverse sensitivity effects to be managed so as not to constrain land based primary production on HPL.

HortNZ notes that some re-zoning of LUC Class 1,2 and 3 is proposed under the draft plan. HortNZ also notes that the government is currently consulting on the removal of LUC Class 3 from the NPSHPL.

HortNZ understands that Tasman District Council utilises a matrix approach to assess the productive importance of land proposed for re-zoning. Use of multiple indicators for productive land acknowledges that the value of that land is not only determined by Land Use Capability. HortNZ suggests it is also determined by other factors such as proximity to markets, ability for utilisation as a productive unit and access to water.

Horticulture NZ is concerned that some proposed re-zoning of sites will result in the loss of productive land near local markets by re-zoning creep. That is, proposed re-zoning may then make it easier for nearby areas to be re-zoned away from productive land in the future. For this reason, it will be important to maintain a consenting framework that requires any application to subdivide land to be subject to assessment of effects on the availability of productive land.

HortNZ notes that the following Rural HPL sites are proposed to be rezoned. Commentary on the proposed rezoning is provided below:

Richmond sites

- Sites T-35a and T-122a have underlying **LUC category 3 soils**, and are currently zoned Rural 1.

HortNZ understands that these sites will become light industrial zones and are deferred for wastewater capacity. HortNZ would prefer that LUC class 3 land is not lost from horticultural production unless TDC's assessment shows there are no alternative suitable sites available. HortNZ notes that this land may already be limited in its productive use due to it lying between two existing residential areas.

- Site T-114a is currently zoned Rural 2, an area on the edge of the site of approximately 3,560m² has underlying **LUC 3 category soils**
HortNZ has no concerns with this site given its slope.
- Site T-114c is currently zoned Rural 2, an area of approximately 48,014m² consisting of **LUC 3 category soils**
- *HortNZ has no concerns with this site given its slope.*

Brightwater site

- T-104b is currently zoned Rural 1, includes an area of approximately 2,603m² consisting of **LUC 3 category soils**
- *HortNZ has no concerns with this site given the size of this site.*

Wakefield sites

- Site T-108 is currently zoned Rural 1 and has underlying **LUC 3 category soils**.
HortNZ understands that these sites will become light industrial zones and are deferred for wastewater capacity. HortNZ would prefer that LUC class 3 land is not lost from horticultural production unless TDC's assessment shows there are no alternative suitable sites available.
- T-194a and T-194c have underlying **LUC category 3 soils**, and are currently zoned Rural 1 and Rural 2.
HortNZ would prefer that LUC class 3 land is not lost from horticultural production. However it recognises that there needs to be provision for housing growth, and utilisation of land adjacent to the existing township provides for coherent development of that township. HortNZ supports a lower density of residential land in T194C, and building setbacks within this zone.
- T-194b is currently zoned Rural 2, approximately 22,785m² consists of **LUC 3 category soil**
Whilst HortNZ would prefer that LUC class 3 land is not lost from horticultural production, it can see the logic of providing for growth on the northwest side of Higgins Road.

Motueka Valley sites

- T-17a is currently zoned Rural 2, approximately 46,170m² of the site consisting of **LUC 2 category soil**.
HortNZ notes that this area is already highly fragmented by lifestyle properties and does not oppose this change.
- T-17b is currently zoned Rural 1. Most of the site consists of **LUC category 3 soils**.
HortNZ does have some concerns about the proposed re-zoning of this site, given its proximity to productive land. Any development in this zone should be subject to setback conditions and noise insulation within a specified distance of the zone boundaries.

- T-17c is currently zoned Rural 1. Most of the site consists of **LUC 3 soils**
- *HortNZ does have some concerns about the proposed re-zoning of this site, given its proximity to productive land. Any development in this zone should be subject to setback conditions and noise insulation within a specified distance of the zone boundaries.*
- T-17d is currently zoned Rural 2, part of the site (approximately 18,582m) consists of **LUC 2 category soil**
HortNZ has no concerns regarding this site.

Takaka sites

- Site T-228 is zoned Rural 1 and has underlying **LUC 3 category soils**. Approximately half of this site is already used for industrial purposes. The other half of this site (approximately 17,518m²) is currently bare farmland.
HortNZ has no concerns regarding this site.
- Site T-144 is zoned Rural 1 and has underlying **LUC 3 soils**. However, this site is all classified as Glenview soils. Glenview soils are characterised by having a well-drained upper B horizon that overlies a pale coloured and mottled clay loam textured lower B horizon. The lower B horizon often has a perched water table present during spring months. An iron pan is also commonly present in the underlying gravel at around 70cm. These features restrict the fertility of these soils as drainage is impaired and rooting depth limited. Glenview soils, unless modified by ripping, are classified as Class C in the TDC Productive Land Classification. (2005 Soils of Lower Takaka Valley).
HortNZ has no concerns regarding this site.
- Site T-138 is zoned Rural 1 and has underlying **LUC 3 soils**.
HortNZ has no concerns regarding this site.

Murchison sites

- Site T-148a is zoned Rural 2 and has underlying **LUC 3 soils**.
HortNZ has no concerns regarding this site.

2.1.2. REVERSE SENSITIVITY

Reverse sensitivity issues are becoming an increasing problem for the horticulture sector as more people move into productive areas who do not have realistic expectations with regards to the activities that can occur because of primary production. Horticulture tends to be particularly susceptible to reverse sensitivity effects due to the location of highly productive land often being located near urban centres and/or the land they operate on being subject to demand for urban development. This is clearly a challenge for the Tasman Region, with population growth expected to continue.

It is important for district plans to include a robust management response. Setbacks and noise insulation are important management tool in helping to manage the potential for reverse sensitivity effects. Setbacks do not preclude development within a lesser distance but at least ensure that a site-specific assessment can be made through a resource consent process.

2.1.3. MAXIMISING INVESTMENT IN ACCESS TO WATER

Waimea Irrigators Limited (WIL) shareholders and TDC have invested heavily in constructing the Waimea Dam. It is critical this investment is maximised by enabling the productive use of land within the Waimea command area.

WIL shareholders have invested in up to 120% of the value of the water allocated to their land. Twenty percent of this investment is redundant as landowners cannot apply more than 100% of their water allocation. Loss of productive land through subdivision will reduce the size of the market for selling Waimea Irrigation shares to potential investors and the ability of growers to purchase additional land to utilise their shares over and above 100%.

2.2. Seasonal Worker Accommodation

HortNZ welcomes a review of the existing Seasonal Worker Accommodation (SWA) rules to enable the use of these facilities without unnecessary consenting cost or uncertainty.

2.2.1. CONSENT STATUS

If SWA meets the listed requirements it will be a controlled activity, subject to conditions in the Tasman District Plan).

- HortNZ supports the controlled status for this activity.
- HortNZ seeks that other associated activities do not trigger additional resource consents.
- E.g.: wastewater and stormwater treatment. HortNZ notes that soils have been mapped in the Tasman Region, and that sufficient information is available on soil drainage rates and performance of wastewater and stormwater systems. Additional soil drainage testing should not be required. The focus needs to be on correct installation of these systems under the Building Act and permitted activity conditions, e.g.: design specifications.

2.2.2. MINIMUM SITE SIZE

The minimum lot size has been reduced from 12 ha to 5000m².

- HortNZ supports the decrease in minimum site size.
- Providing the 'site' relates to an individual title rather than a combined horticultural operation (multiple titles).

2.2.3. ABILITY TO RELOCATE BUILDINGS

The rule states that buildings must be relocatable.

- HortNZ does not support this requirement.
- Costs for building a relocatable facility can be higher. Additionally wooden floors required in relocatable buildings can be less practical to manage.
- Permanent accommodation will not result in any significant loss of productive land.

2.2.4. AVAILABILITY OF POTABLE WATER

Reticulated potable water needs to be available.

- HortNZ supports this requirement.
- Providing potable water requirement is to accommodation facilities overall, rather than individual facilities that may just be used for sleeping.

2.2.5. MAXIMUM NUMBER OF PEOPLE HOUSED

The maximum number of people that can be housed under the proposed rule is 30.

- HortNZ seeks an increase in this allowance for up to 35 people. This will maximise the investment associated with building services (adding sleeping quarters is the less expensive component of providing facilities for seasonal workers).
- A threshold of 35 aligns better with employer needs and Recognised Seasonal Employer (RSE) requirements (e.g.: 1 toilet/1 shower required per 7 people).

2.2.6. SETBACKS

Requirement to comply with building setbacks.

- HortNZ supports a 30 m setback.
- However, this setback should not apply if the adjacent site is in the same ownership or is a public road.