

SUBMISSION ON

Eastern Bay Spatial Plan

15 November 2024

To: Bay of Plenty Regional Council, Whakatāne District Council, Kawerau District Council and Ōpōtiki District Council

Name of Submitter: Horticulture New Zealand

Contact for Service:

Emily Levenson
Environmental Policy Advisor
Horticulture New Zealand
PO Box 10-232 WELLINGTON
Ph: 027 305 4423
Email: Emily.levenson@hortnz.co.nz

OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Submission
Focused on protecting highly productive land for primary production

Our submission

Horticulture New Zealand (HortNZ) thanks Bay of Plenty Regional Council, Whakatāne District Council, Kawerau District Council and Ōpōtiki District Council for the opportunity to submit on the Eastern Bay Spatial Plan and welcomes any opportunity to continue to work with the Councils and to discuss our submission.

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

HortNZ's Role

Background to HortNZ

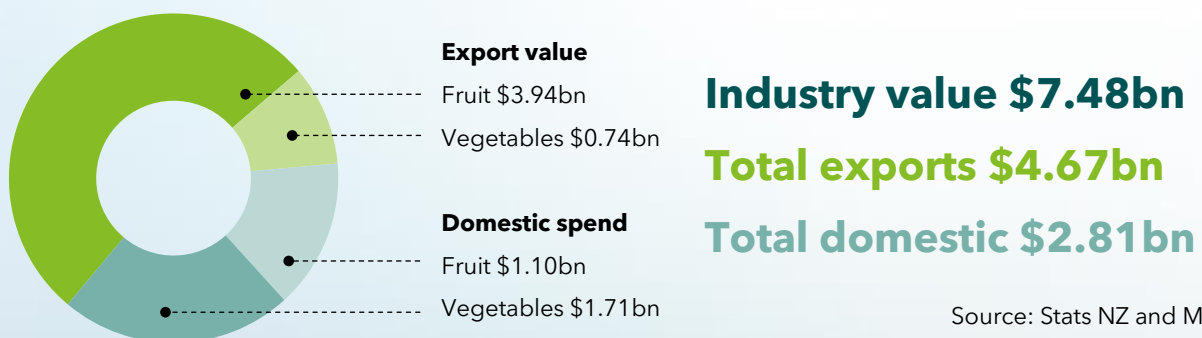
HortNZ represents the interests of approximately 4,200 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

There are 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.



Submission

1. Horticulture in Eastern Bay of Plenty

The overall Bay of Plenty region is one of the largest fruit growing regions in New Zealand. There are approximately 1,592 ha of orchards and other perennial crops in Ōpōtiki, 4 ha in Kawerau District, and 1,299 ha in Whakatāne.¹ Ōpōtiki and Whakatāne districts also have a smaller amount of vegetable growing. The districts' crops include kiwifruit, avocados, berries, citrus, feijoas, greenhouse vegetables, passionfruit, tamarillos and sweet corn.

The Eastern Bay of Plenty (EBOP) has a climate and environment well-suited to horticultural production, including free draining soils, warm weather and high sunshine hours. The *Eastern Bay of Plenty: Regional Development Project* report identifies that "EBOP have some of the most productive soils and best growing climates for high value horticulture crops in the country".² EBOP has a strong horticultural history, including extensive pre-colonial gardening at Kawerau and throughout the Rangitaiki Plains.^{3,4}

2. Balancing Housing and Food Production

Housing and food production do not need to be mutually exclusive goals. With careful planning, the region can continue to build strength in export earnings, local food production and housing development.

The key is avoiding land use conflict, particularly reverse sensitivity. Horticultural operations do their best to manage effects on neighbours, but the expectations of new residential and other sensitive activities are not always manageable or realistic for a productive, working landscape. These expectations constrain production and limit the ability to use prime growing land for growing fruits and vegetables. Horticulture often takes place on the urban-rural fringe, including in EBOP, so it is particularly vulnerable to reverse sensitivity effects.

To support food production for current and future generations in EBOP, the Councils need to manage the urban-rural interface and ensure that the Spatial Plan does not direct housing growth where it will create reverse sensitivity effects which constrain primary production, particularly on highly productive land. Spatial planning can avoid the conflict before it happens, rather than imposing rules that constrain the noise, light, visual appearance and traffic movements of primary production activities for the sake of neighbouring sensitive activities.

¹ 2020 Land Cover Database (LCDB v5)

² [Eastern Bay of Plenty: Regional Development Project](#). 2018. (p. 26)

³ Furey, Louise. [Maori gardening: An archaeological perspective](#). Department of Conservation. October 2006. (p. 65)

⁴ Jones, Kevin L. [Maori Settlement and Horticulture on the Rangitaiki Plains](#), Bay of Plenty, New Zealand. Department of Conservation. *New Zealand Journal of Archaeology*. 1991. (p. 143)

The following policies of the National Policy Statement for Highly Productive Land (NPS-HPL) are particularly relevant to the Eastern Bay Spatial Plan:

*Policy 2: The identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and **urban development**. (emphasis added)*

Policy 4: The use of highly productive land for land-based primary production is prioritised and supported.

Policy 5: The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.

Policy 6: The rezoning and development of highly productive land as rural lifestyle is avoided, except as provided in this National Policy Statement.

Policy 8: Highly productive land is protected from inappropriate use and development.

3. Proposed Eastern Bay Spatial Plan

This section responds directly to the proposed Spatial Plan.

3.1. Overview

The Spatial Plan estimates that over the next 30 years, an extra 12,000 people and 5,500 more homes are expected in the EBOP districts. 4,000 new jobs are expected to be created between 2022 and 2055.⁵ Some of this employment could come from the horticulture sector, which has a strong presence in the region. The draft *Economic Development Strategy Refresh for the Eastern Bay of Plenty* identifies that there is “further development potential in both Kiwifruit [sic] and other horticultural subsectors”.⁶

3.2. Highly Productive Land in the Spatial Plan

HortNZ supports that protecting highly productive land and horticulture was taken into consideration while identifying potential development options.⁷ That being said, the draft *Scenarios and Development Options Report* does note that “limited high-value horticulture” is “likely to be impacted” by residential development in Hukutaia.⁸ Putauaki Trust Industrial Area, allocated for future growth, is on LUC III land. There is a large area southeast of Matatā, which is LUC II and III and should be protected from inappropriate subdivision, use and development, especially given the existing presence of kiwifruit growing.

When the Spatial Plan is finalised, care must be taken in drawing the boundaries of the future growth areas to ensure there will be an adequate buffer between new housing and highly productive land - whether or not it is currently in production - to manage the urban-rural interface and provide for future generations. The NPS-HPL requires that highly

⁵ [He wāhi tīmatanga: Our starting point](#). October 2024. (p. 16)

⁶ Economic Development Strategy Refresh for the Eastern Bay of Plenty. Draft 1.2. 15 August 2024.

⁷ [Scenarios and Development Options Report: Draft version for engagement](#). October 2024. (p. 103)

⁸ [Scenarios and Development Options Report: Draft version for engagement](#). October 2024. (p 111)

productive land is protected from urban or rural lifestyle rezoning. These soils are an intergenerational asset that will provide for food production and economic development for generations to come.

The District Councils will need to provide direction through plans to ensure that reverse sensitivity effects on existing and new lawfully established horticulture are mitigated in line with the NPS-HPL. HortNZ supports the recommendation in the *Scenarios and Development Options Report* that district and regional plans are reviewed to ensure rural residential development “does not cause reverse sensitivity constraints toward horticultural, agricultural, industrial activities”.⁹

3.3. Discussion Questions

- Q. 1a** What are your thoughts about where to plan for 5,500 new houses and land for businesses by 2055?
Have we got it right with Scenario 1, and do you agree we are looking at the right places for growth? If not, what would you want us to change or consider?

The Spatial Plan has provided three scenarios on how this growth can be accommodated. The plan identifies Scenario 1 as the preferred option, which would see greenfield development in Matatā, Awakeri and Hukutaia and “a low level of residential infill and a low level of rural residential development”.

HortNZ supports Scenario 1, with some concerns related to reverse sensitivity and potential loss of highly productive land, as highlighted above.

- Q. 1b** Have we considered all the important factors? This could be things about the environment, society, economy, culture, or climate change and natural hazards.

HortNZ recognises and supports the recognition given to highly productive land and reverse sensitivity in the research and planning work behind the Spatial Plan.

Greater consideration could be given to which areas are well-suited to horticultural expansion (to contribute to the local economy and regional emissions reductions). Those areas identified should not be slated for future residential development. Even new homes or other sensitive activities neighbouring production areas can debilitate the ability for current or future growers to carry out normal horticultural activities.

3.4. Alignment with Goals of the Spatial Plan

The table on the next page shows how enabling horticulture and protecting highly productive land for food production aligns with the goals of the Spatial Plan.

⁹ [Scenarios and Development Options Report: Draft version for engagement](#), October 2024. (p. 110)

Goals	Alignment with Enabling Horticulture
Healthy and healing (Environmental and Cultural)	Horticulture provides healthy food for people, whether exported or sold into the domestic market. Horticulture is a low-emissions activity with relatively low environmental effects. Māori growers are an important part of the Eastern Bay's horticulture sector.
Sustainable, diversified economy providing jobs and purpose for our people (Economic and Social)	Horticulture supports the transition to a low-emissions economy while providing a range of fulfilling jobs on farm/orchard, in the packhouse and in the back office.
Connected, thriving, resilient people, communities & places that reflect our history and aspirations (Social and Cultural)	A strong economy with meaningful work and opportunities supports a thriving, resilient community. EBOP has a strong horticultural history dating to pre-colonial times ¹⁰ and can grow its horticultural success into the future.

¹⁰ Furey, Louise. [Maori gardening: An archaeological perspective](#). Department of Conservation. October 2006.