

SUBMISSION ON

Plan Change B: Residential Zone

6 December 2024

To: Manawatū District Council

Name of Submitter: Horticulture New Zealand

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OVERVIEW

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Our submission

Horticulture New Zealand (HortNZ) thanks Manawatū District Council for the opportunity to submit on Plan Change B and welcomes any opportunity to continue to work with Manawatū 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

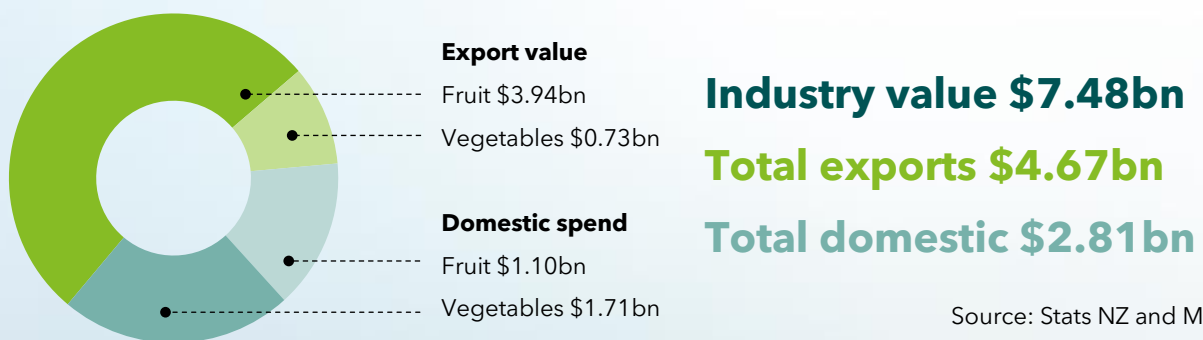
HortNZ represents the interests of approximately 4,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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.



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.



Executive Summary

- The District Plan should give consideration to how to implement good policies to manage impacts of reverse sensitivity at the boundary of rural and residential zones.
- 30m vegetated buffer zones included within a new development can add to the amenity of the development and provide a functional benefit of minimising reverse sensitivity impacts so rural production activities can occur.
- Seasonal worker accommodation may be located within villages (such as Halcombe or Kimbolton) and should be considered within the context of Plan Change B

Submission

1. Horticulture in Manawatū

Manawatū District is located within the Manawatū-Whanganui Horizons region. There is a diverse climate within the region. This is because the region covers a large area, from the central plateau in the mid-North Island that has higher rainfall, snow and lower median average temperatures, to lower rainfall in the western coastal areas, more wind and a relatively higher median average temperature. Generally, the climate is considered mild and less prone to extremes than in other areas of New Zealand.¹

The climate works well for many types of horticultural production, but the predominant land uses lend well to incorporating short-rotational cropping into farming systems. According to the Landcover database, there are 4558.7ha of horticultural crop land in the Manawatū District, with the majority of this, 4549.5ha, in short-rotational cropland².

Crops grown in the Manawatū District include brassicas, leafy greens, onions, pumpkins, butternut squash, peas, feijoas, asparagus, potatoes. The district plays an important role in the national food system.

The Manawatū District has long been recognised for its productive capacity and has a long history of occupation in the area³. The soils and climate provide an ideal climate for growing a wide range of horticultural crops. This helped to support a robust pre-colonial economy with crops being traded with other communities outside the region⁴.

2. Horticulture needs

2.1. Land use, water and horticulture needs

Growers have been making progress on the uptake of Good Management Practices (GMP) and Best Management Practices (BMP), HortNZ has been actively supporting growers prepare for Freshwater Farm Plans (FWFP)⁵. The practice adoption has been tracked through HortNZ's Growing Change project and has been focused on the Horowhenua and Ohakune areas within the Horizons region. Some growers that are within the Manawatū District have also participated in the project. HortNZ believes FWFP and the use of industry programmes to support the uptake of GMP's and BMP's will be fundamental to achieving improvements in environmental outcomes and providing local authorities reassurance about any increase in horticulture in their area.

¹ [NIWA ManawatuWanganui Climate WEB.PDF](#)

² [LCDB v5.0 - Land Cover Database version 5.0, Mainland, New Zealand | LRIS Portal \(scinfo.org.nz\)](#)

³ [Early Māori history - Te Ara Encyclopedia of New Zealand](#)

⁴ [Heritage resources: Heritage \(doc.govt.nz\)](#)

⁵ [Freshwater Farm Plans | Horticulture New Zealand – Ahumāra Kai Aotearoa \(hortnz.co.nz\)](#)

Freshwater use and access is important to consider in the context of Plan Change B, as short rotational cropping is dynamic in both use of water and location, and reverse sensitivity impacts are most keenly experienced at the rural / urban boundary interface.

It is important to consider how these impacts can be managed within the context of Plan Change B to ensure rural production is able to occur and how effects of sensitive activities locating near the rural zone can be planned for to ensure production can still occur.

2.1.1. POST-HARVEST WATER REQUIREMENTS

Growers need to work within food safety and market requirements to ensure produce is safe and fit for human consumption.⁶ Part of food safety frameworks which are incorporated into commercial accreditation programmes such as New Zealand Good Agricultural Practice (NZ GAP) is the requirement to test water for contaminants such as *E. coli*. It is important water used to wash produce is of a quantity and standard to ensure produce is clean and safe for consumers before it makes it to market. In addition to water testing and food safety processes within an operation, produce sold through retailers and markets is subject to random testing to provide consumers with confidence that the produce they purchase has been grown and produced in a way that it is safe to eat.

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 as part 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.

It is important for district plans to include a robust management response. Setbacks are an important management tool in helping to manage the potential for reverse sensitivity effects. As a permitted activity requirement, they 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. SEASONAL WORKER ACCOMMODATION

Seasonal worker accommodation provides for temporary and often communal living arrangements; it is quite distinct from permanent worker accommodation which might support a full-time employee and their family. It is a definable activity that requires a specific resource management response to reflect the nature of the activity. Accommodating seasonal workers in appropriate accommodation near their places of employment is more efficient for the horticulture industry than accommodation further afield which requires workers to commute.

The district plan will provide a planning framework for the community for at least the next decade and, therefore, a definition of seasonal worker accommodation should be included in the plan and should be provided for within the GRUZ. Several district plans have taken the

⁶ [2019-07-24-Guidelines-for-Fresh-Produce-Food-Safety-2019-WEB.pdf \(hortnz.co.nz\)](https://www.hortnz.co.nz/2019-07-24-Guidelines-for-Fresh-Produce-Food-Safety-2019-WEB.pdf)

approach of providing for such facilities based on a concept of shared kitchen and ablution facilities and separate sleeping quarters. This type of facility is cost efficient and adequately provides for seasonal accommodation.

2.1.4. NATIONAL DIRECTION AND SUPPORT FOR HORTICULTURE

The National Policy Statement for Highly Productive Land (NPS HPL) provides a clear direction about how to protect highly productive land for land-based primary production. As currently drafted, the NPS HPL does not distinguish between LUC 1, 2 or 3 land as needing different levels of protection and treats these classes equally in recognition of the productive capacity of this land.

Recent amendments to the NPS HPL provide clarity that greenhouse production is an appropriate activity on highly productive land⁷; however, it is important to consider the full range of activities required that make land productive. This includes access to freshwater and consideration of facilities such as post-harvest facilities that prepare fresh produce according to food safety and market specifications. If there is potential for horticulture activity to increase in the district it is important to consider all the needs that growers require to get produce from paddock to market.

The National and Built Environment Act select committee reports recommended that Act must provide direction on enabling supply of fresh fruit and vegetables.⁸ While this legislation has been repealed, the recognition of the vulnerability to our domestic food supply and the role of horticulture being recognised as critical for supporting the health and needs of the population is unchanged.

Minister Parker's letter to regional councils sent in April 2023 sought information about how vegetable growing is being provided for in NPSFM plans. In addition, the Aotearoa Horticulture Action Plan seeks to provide a framework to grow the value of the horticulture industry to \$12 billion by 2035.⁹ This is a 'quadruple helix' strategy that involves a combination of effort between industry, government, Māori and growers.

If the ultimate higher purpose is to create plans for the future that help guide development and how our population will be housed, where they will grow and be supported, it is critical the following are considered:

- Climate change adaptation and opportunities;
- Land use change;
- Horticulture's potential and role in transitioning to low emissions economy; and
- Regional growth and development: how we feed the growing population and support populations through employment opportunities.

⁷ [NPS-HPL-with-2024-Amendments.pdf](#)

⁸ [404 Not Found - New Zealand Parliament \(www.parliament.nz\)](#)

⁹ [Growing together 2035 - Aotearoa Horticulture Action Plan \(February 2023\) \(mpi.govt.nz\)](#)

Policies to manage ad-hoc urban and lifestyle development are essential to maintain highly productive land resource for future generations. Highly productive land is a finite resource and intergenerational asset that is under threat in New Zealand – most significantly due to urban development, as reported in ‘Our Land 2021’ which states that the area of highly productive land that was unavailable for horticulture because it had a house on it increased by 54% from 2002 to 2019.¹⁰

There are many elements that contribute to the productive capacity of land, but land itself is the primary aspect. When land is fragmented or urbanised it is seldom returned to productive uses. Development at adjoining boundaries between rural and urban zones need to provide adequate mitigations to reduce the impacts of reverse sensitivity and ensure rural production is able to continue.

2.2. Regulatory and legislative changes

There is a significant amount of regulatory change in progress affecting the rural community. Councils have obligations and responsibilities to some pieces, and others may be out of a local authority’s direct scope.

These changes include (but are not limited to):

- NPSFM 2020 plan changes and development
- Climate Change adaptation and planning
- NPS HPL amendments
- RMA reform
- Natural hazard planning and response

It is a time of transition and change while growers, Councils and community wait to see what form the reviewed and replacement legislation takes and what this will require from growers.

3. Draft Plan Change B: General Residential

HortNZ notes that there is no specific consideration given in draft Plan Change B on how to manage the effects between residential and rural zones.

HortNZ recommends including a requirement for new residential subdivision adjoining a rural zone to incorporate a 30m vegetated buffer zone. This will add to the amenity of a new development and fit with the general amenity of the district as well as provide a reasonable buffer to minimise impacts of reverse sensitivity and ensure rural production activities are able to occur. A setback of 15m is sought where a residential activity is locating on the boundary with the Rural Zone.

¹⁰ Our Land 2021. Ministry for the Environment.

Submission on Draft Plan Change B: General Residential

Without limiting the generality of the above, HortNZ seeks the following decisions on Draft Plan Change B, 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
GRZ-P7	Oppose in part.	The policy seeks to recognise the potential for adverse effects from activities in the Town Centre, Mixed Use, Commercial or General Industrial zones but does not consider the rural zones which may be adjacent to residential areas. Given the potential for cross boundary reverse sensitivity effects HortNZ seeks that the rural zone is also included.	Amend GRZ-P7 by adding 'and Rural Zones' to the policy consideration.
GRZ-R1	Support	HortNZ supports use of both residential activity and residential units in the rule.	Retain GRZ-R1 applying to both residential activity and residential units.
GRZ-R.1.2 - GRZ-MD3	Support in part.	The matter of discretion considers effects on streetscape and amenity of adjacent properties and loss of privacy but should also consider potential reverse sensitivity effects where the activity is located adjacent to the zone boundary.	Amend GRZ-R.1.2 - GRZ-MD3 by adding: And reverse sensitivity effects where the activity is located adjacent to the zone boundary.

GRZ-R.2.2 - GRZ-MD3	Support in part.	The matter of discretion considers effects on streetscape and amenity of adjacent properties and loss of privacy but should also consider potential reverse sensitivity effects where the activity is located adjacent to the zone boundary.	Amend GRZ-R.2.2 - GRZ-MD17 by adding: And reverse sensitivity effects where the activity is located adjacent to the zone boundary.
GRZ-R9 medium density development, residential activities that cannot comply with GRZ-ST1, and retirement villages	Support in part	GRZ-R9 may apply for any workers accommodation that sought to establish within the residential zone. Where a grower employs workers, and the property or properties are near residential areas, it may be preferable to accommodate workers in the residential area rather than in the rural area. This may best be provided through bespoke accommodation facilities. HortNZ seeks appropriate matters of discretion for such situations.	Add an additional matter of discretion: The ability of the residential activity to provide for workers in the Manawatu district.
GRZ-ST1.1 Density	Support in part	The standard applies to residential units, so no provision is made for residential activity that is not a single household so limits other residential uses of a site.	Amend GRZ-ST1.1 1) from 'residential unit' to 'residential activity'.
GRZ-ST4 Setbacks	Oppose in part	Under GRZ-ST4.2 A residential unit could establish within 1.5m of the boundary with the rural zone. HortNZ considers that this does not give adequate protection from potential reverse sensitivity effects from adjoining rural production activities.	Amend the setbacks in GRZ-ST4.2 as follows: Where the side boundary adjoins the Rural Zone the setback for residential units and residential activities is 15m.

		It is noted that GRZ-ST4.2 uses the term 'dwelling' and this should be replaced with residential unit or residential activity'.	Amend all uses of 'dwelling' to 'residential unit or residential activity'.
Subdivision - Objectives	New	The Operative Plan has an objective – SUB-O2 that considers rural separation distances. But there is no objective that establishes a framework for how zone boundaries are managed through the subdivision process.	Add a new objective in Subdivision: Ensure that subdivision design minimises potential for reverse sensitivity effects between zone boundaries.
SUB-RXX Any General Residential Zone subdivision	New	Include a new standard for managing cross boundary effects from subdivision.	Add a new standard: SUB-STXX Cross boundary matters
SUB-MDXX 16	Support	HortNZ supports consideration of measures to delineate the boundary between urban and rural environments and separation between potentially incompatible activities.	Retain SUB-MDXX 16
Standards – General Residential Zone	New	Include a new standard for managing cross boundary effects from subdivision	SUB-STXX Cross boundary matters Any subdivision of land adjacent to a zone boundary will provide a buffer separation between the zones. For the boundary with the Rural Zone this should be a 30m vegetated buffer.