

# **SUBMISSION ON**

# Draft Plan Change 1E – Rural Indigenous Biodiversity Incentives

16 January 2025

**To:** Kāpiti Coast 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  
Background information about the importance of highly productive land
- 3 Part 3: Amendment Table  
Direct feedback on the drafted provisions

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## Our submission

Horticulture New Zealand (HortNZ) thanks Kāpiti Coast District Council for the opportunity to submit on Plan Change 1E and welcomes any opportunity to continue to work with Kāpiti Coast 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

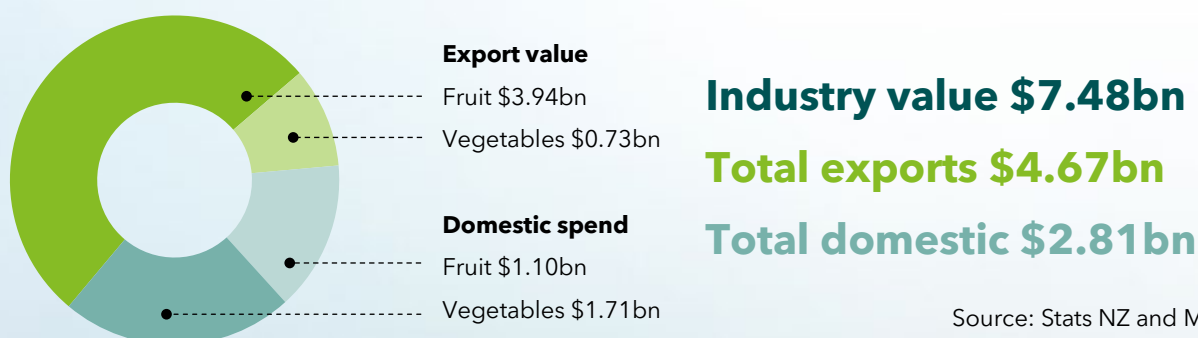
HortNZ represents the interests of approximately 4,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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.



# Submission

## 1. Horticulture in Kāpiti Coast District

The Kāpiti Coast District is home to approximately 20 commercial fruit and vegetable growers. The district has 311.5 ha of short-rotation cropland (arable and vegetable growing) and 345.7 ha of orchards, vineyards or other perennial crops, mostly centred around Ōtaki.<sup>1</sup> Crops grown in the district include berries, pears, apples, apricots, melons, herbs, Asian greens, cabbage, squash, lettuce, rhubarb, cucumbers, beans, beetroot and tomatoes.

Ōtaki in particular has a long history of horticultural production. Chinese and European market gardens grew produce in Ōtaki as early as the 1890s, with the Ōtaki Horticultural Society formed in 1898.<sup>2</sup> After the government bought up the Hutt Valley's "prime horticultural land" for urban development in the 1920's, growers relocated to Ōtaki and Levin.<sup>3</sup> Ōtaki growers rallied to supply vegetables for the armed services and US Marines during World War II.<sup>4</sup> Until the mid-1990s, there were hundreds of market gardeners operating in Ōtaki.<sup>5</sup> Over time, commercial pressures and land prices drove many Ōtaki growers north to Levin or out of the industry.<sup>6</sup> Horticultural businesses still call the district home, however, providing healthy, fresh produce to local consumers, the wider domestic market, and export markets.

## 2. Highly Productive Land

Protecting the Kāpiti Coast District's highly productive land from inappropriate subdivision and development is important to retain food-growing capacity for present and future generations. A 2010 report on food production in Ōtaki reported that even then, growers were concerned about "non-productive use of good growing land", including for residential development.<sup>7</sup> These concerns, felt throughout the country given that horticultural businesses often operate at the urban-rural fringe, were eventually addressed in the National Policy Statement for Highly Productive Land 2022 (NPS-HPL) which this plan change references.

<sup>1</sup> Manaaki Whenua Landcare Research. Land Cover Database v5

<sup>2</sup> Ōtaki Heritage. "[Ōtaki history](#)". Accessed 16/01/25.

<sup>3</sup> Maggy Wassilieff, '[Market gardens and production nurseries - History of market gardening](#)', Te Ara - the Encyclopedia of New Zealand. 24 November 2008. Accessed 16/01/25.

<sup>4</sup> Kāpiti Coast District Council. "[Our district's history](#)". Accessed 16/01/25.

<sup>5</sup> Carson, Ian. "[Old gardeners trust hands out cash to community](#)". *Ōtaki Today*. 15 October 2020. Accessed 16/01/25.

<sup>6</sup> Andrew, Robbie et al. [Assessment of rural productive potential in the Greater Ōtaki area: Scenarios and options for a sustainable food future](#). Prepared by Landcare Research for Kāpiti Coast District Council. December 2010. Accessed 16/01/25.

<sup>7</sup> Andrew, Robbie et al. [Assessment of rural productive potential in the Greater Ōtaki area: Scenarios and options for a sustainable food future](#). Prepared by Landcare Research for Kāpiti Coast District Council. December 2010. Accessed 16/01/25.

### 3. Draft Plan Change 1E

The purpose of this plan change is to provide incentives for indigenous biodiversity through provisions that allow subdivision for bonus allotments in rural zones. HortNZ supports this plan change, so long as it continues to give effect to the NPS-HPL.

#### 3.1. Discussion Questions

This section responds directly to the Council's consultation questions.

**Q. 1** What are the key issues that matter most to you in this draft of this plan change?

Protecting highly productive land for primary production is the most relevant issue for the horticulture sector.

**Q. 2** What do you agree with, and why?

HortNZ supports that provisions to allow bonus allotments for biodiversity purposes do not apply to highly productive land. Integrated application of the National Policy Statements for Indigenous Biodiversity and Highly Productive Land ensures that resource management values are balanced, rather than placed in competition with one another.

**Q. 3** What do you disagree with, and why?

n/a

**Q. 4** What ideas do you have for improving this draft of the plan change?

n/a

## Submission on Plan Change 1E - Rural Indigenous Biodiversity Incentives

Without limiting the generality of the above, HortNZ seeks the following decisions on the plan change, 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
Definition of highly productive land	Support	This definition aligns with the NPS-HPL.	Retain as drafted.
Definition of LUC 1, 2, or 3 land	Support	This definition aligns with the NPS-HPL.	Retain as drafted.
UEDI-P3 Bonus allotments	Support in part	The word "retained" as opposed to "maintained" better aligns with section 3.8 of the NPS-HPL. Provisions to implement the NPS-HPL are supported. In particular the integrated management of indigenous biodiversity and highly productive land is supported.	Retain parts 3, 9, 10, 11 and 12. Amend part 7 as follows: it avoids the subdivision of LUC 1, 2 or 3 land and/or highly productive land, unless it can be demonstrated that either: a. the overall productive potential of the subject land will be <del>maintained</del> <b>retained</b> over the long term; or b. the subdivision is on specified Māori land;
SUB-RUR-R53 Subdivision which creates one or more bonus allotments through creating areas of new indigenous vegetation planting, or the enhancement and restoration of ecological sites and identified ecological areas.	Support in part	These standards and matters of discretion give effect to the NPS-HPL and ensure reverse sensitivity effects do not compromise the productivity of highly productive and other horticultural/farming land.	Retain standard 7 and matters of discretion 7 and 16.

SUB-RUR-R58 Subdivision in any Rural Zone which does not comply with restricted discretionary activity subdivision standard 9 in Rule SUB-RUR-R53.	Support	Non-complying status for subdivisions which do not comply with the RDA conditions (including those related to highly productive land) is appropriate.	Retain as drafted.
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