

14 November 2023 Hearing Prep – General District-wide Matters, earthworks and light

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Hearing Presentation:

Thank you for the opportunity to speak to you today. My name is Emily Levenson, and I am an Environmental Policy Advisor at Horticulture New Zealand.

I'll start by laying out some background about horticulture in the West Coast region, address the specific points where HortNZ still seeks alignment between the plan and our evidence, and leave time for questions.

Horticulture in West Coast

There are about seven horticultural growers located on the West Coast, including both traditional outdoor growing and indoor covered cropping, such as glasshouses. Much of the horticulture on the West Coast is located near Karamea.

Crops grown include tomatoes, cucumbers, lettuce and herbs grown indoors and subtropical fruits like tamarillos, feijoas, and passionfruit grown outdoors. There are over 1.6 ha in covered cropping and 29 ha in outdoor horticulture on the West Coast.

There is potential for future growth, especially in the form of covered cropping which is more protected from adverse weather conditions. HortNZ recognises that this would be supportive of local food security, since most fruits and vegetables consumed in the West Coast are produced in other regions.

General District Wide Matters

On the topics of earthworks and light provisions, HortNZ seeks objectives, policies and rules that enable horticulture. This approach aligns with the new Natural and Built Environment Act, which requires the National Planning Framework to enable the supply of fresh fruits and vegetables.

Earthworks

In terms of earthworks, HortNZ continues to seek an approach to earthworks rules that enables cultivation in appropriate areas. In the words of the reporting officer, "It is appropriate to enable cultivation where potential effect on the National Grid is managed." I request that this sentiment is reflected in the recommended provisions.

In the new EW-Rule X, I continue to seek use of the phrase "ancillary rural earthworks or cultivation" rather than "agricultural or domestic cultivation" because cultivation is a term defined in the National Planning Standards that is not necessarily agricultural or domestic. Cultivation often refers to horticulture. Ancillary rural earthworks is a phrase that captures the disturbance of soil, earth or substrate land surfaces for farming purposes. This includes land preparation, burying infected material that poses a biosecurity threat, irrigation and land drainage, and maintenance and construction of facilities, devices and structures for farming activities. These are all necessary

supporting activities for horticulture and should be permitted in EW-RX as appropriate uses of land that do not interfere with operation of the National Grid.

Light

With regard to light, I support recommendations made in the S42a Addendum to move maintaining ecosystems to LIGHT-P3 and to recognise the functional or operational needs of activities under LIGHT-P1. Lighting is an operational need for rural production activities because of the logistical requirements to work at night.

I still seek changes to LIGHT-R4 to allow for nighttime horticultural activities. In my evidence, I recommended a 5 lux limit at night rather than 2 lux. This will ensure that health and safety requirements can be met for horticultural businesses who sometimes have a need to operate outdoors at night. For instance, workers may need to load produce into trucks to transport goods to market in the early hours of the morning, and they need sufficient light to be able to do so.

It would be concerning if rural production activities were constrained by this rule out of concern for residential dwellings on nearby properties, as was suggested by Mr. Wilson in his evidence for West Coast Regional Council. Primary production is the most appropriate use of the rural zone and should not be constrained by reverse sensitivity effects, especially on highly productive land. While there is limited highly productive land in the West Coast, some is located near Karamea where most of the region's horticulture takes place.

Policy 4 of the NPS-HPL states that, "The use of highly productive land for land-based primary production is prioritised and supported".¹

Policy 9 of the NPS-HPL also states that, "Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land". For these reasons, 5 lux is a more appropriate light limit to support the best use of the rural zones, which is for primary production activities.

Conclusion

Thank you for the opportunity to speak to you today. I'm happy to answer any questions you may have.

¹ National Policy Statement for Highly Productive Land 2022