

**BEFORE THE HEARING COMMISSIONER APPOINTED BY THE TE TAI POUTINI PLAN  
COMMITTEE**

**IN THE MATTER** of the Resource Management Act 1991 (**the Act**)

**AND**

**IN THE MATTER** of hearing of submissions on Te Tai o Poutini (West Coast  
Combined District) Plan,  
Hearing Topic: Natural Features and Landscapes

---

**INDUSTRY STATEMENT TO BE TABLED BY EMILY LEVENSON FOR  
HORTICULTURE NEW ZEALAND**

**2 February 2024**

---

## INTRODUCTION

1. My name is Emily Levenson. I am an Environmental Policy Advisor at Horticulture New Zealand (HortNZ). I work within the Environmental Policy Team on national, regional, and district planning processes across New Zealand. I have been in this role since 16 January 2023.
2. I hold a Bachelor of Science in Urban Studies and Planning from the Massachusetts Institute of Technology (MIT).
3. I worked in urban planning and environmental policy research for two years at MIT, Manaaki Whenua Landcare Research, and as an independent contractor assisting researchers at the Victoria University of Wellington and Scion.
4. I am an associate member of the Environmental Institute of Australia and New Zealand (EIANZ).
5. Since beginning my role at HortNZ, I have met with growers across New Zealand to better understand their horticultural operations and how resource management issues impact them.

### *Involvement in the proceedings*

6. When I joined HortNZ in January 2023, I took on the role of supporting Te Tai o Poutini Plan proceedings.
7. I have had meetings and conversations with planners and other advisors since April 2023 seeking information to support the HortNZ submission and evidence produced for this process. I have spoken with growers on the West Coast about their planning concerns.
8. In preparing my evidence, I have read:
  - (a) The Proposed Te Tai o Poutini Plan
  - (b) HortNZ submission
  - (c) The Section 42a report and appendices
  - (d) The New Zealand National Policy Statement for Highly Productive Land (NPS-HPL)
  - (e) The New Zealand National Policy Statement for Indigenous Biodiversity (NPS-IB)
  - (f) Relevant provisions of the Resource Management Act 1991

## PURPOSE AND SCOPE OF EVIDENCE

9. This statement responds to the Section 42A report recommendations regarding Horticulture NZ's submission and further submissions on Te Tai o Poutini Plan, specifically on the Hearing Topic of Natural Features and Landscapes.

## OVERVIEW OF HORTICULTURE NZ

10. HortNZ is the industry body for the horticulture sector, representing growers who pay levies on fruit and vegetables sold either directly or through a post-harvest operator, as set out in the Commodity Levies (Vegetables and Fruit) Order 2013.
11. On behalf of growers, HortNZ takes a detailed involvement in resource management planning processes as part of its national and regional environmental policy response.

## RESPONSE TO SECTION 42A REPORT – TOPIC: NATURAL FEATURES AND LANDSCAPES

### **Summary of HortNZ's submission and further submissions**

12. Table 1 below summarises the provisions on which HortNZ made submissions (and further submissions).

*Table 1: Summary of HortNZ submission and further submission interests*

Provision	Summary of HortNZ interests	HortNZ Response to S42a	Amendments still sought
NFL-P1	HortNZ sought the retention of NFL-P1 a).	HortNZ supports the amendments to NFL-P1 proposed by the S42a author.	n/a
NFL-P3	HortNZ sought that "farms" be replaced with "rural production activities".	HortNZ accepts the decision of the S42a author.	n/a
NFL-R1	HortNZ sought inclusion of "rural production activities" after "renewable electricity generation activities".	<b>HortNZ continues to seek provision for rural production activities to support NFL-P1 a).</b>	<b>Insertion of "rural production activities" after "renewable electricity generation activities".</b>
NFL-R8	HortNZ sought deletion of the word "stock" preceding water reticulation.	HortNZ supports the decision of the S42a author to accept this recommendation.	n/a

### **Horticulture in the West Coast**

13. There are a small number of horticultural growers located on the West Coast, including both outdoor growing and indoor covered cropping. Many of the horticultural businesses on the West Coast are located near Karamea.
14. Crops include tomatoes, berries, tamarillos, citrus, passionfruit, feijoas and leafy greens. There are over 29 ha in outdoor horticulture and 16,000 m<sup>2</sup> in covered cropping on the West Coast.<sup>1</sup>
15. There is potential for future growth, especially in the form of covered cropping which is more protected from adverse weather conditions.

### **Key issues and outcomes sought**

16. HortNZ's key interest is that the Te Tai o Poutini Plan supports existing growers and is futureproofed to allow for horticultural expansion. Horticulture in the West Coast bolsters the local supply of healthy food and contributes to the low emissions economy.

### **Providing for horticulture alongside Outstanding Natural Features and Landscapes: NFL-R1**

17. HortNZ is concerned whether the rules in the chapter adequately provide for horticulture alongside Outstanding Natural Features and Landscapes to meet NFL-P1 a), which provides for lawfully established horticultural activities in these areas.
18. NFL-R8 provides for horticultural buildings and structures within reasonable parameters, but it is unclear whether this rule provides for horticultural activities that do not take place in a building, such as outdoor cultivation.
19. NFL-R1 is a fitting place to provide for horticultural activities beyond buildings and structures, which is why HortNZ sought the inclusion of the phrase "rural production activities".
20. The Section 42a author rejected this proposed amendment out of concern that the definition of "rural production activities" might be too broad.<sup>2</sup>
21. In our submission, HortNZ's proposed definition for rural production activities was "agricultural, pastoral, horticultural activities", to provide a more concise alternative to a phrase that is used throughout the plan.
22. If agricultural, pastoral and horticultural activities are considered appropriate alongside the list of activities in NFL-R1, which they should be

---

<sup>1</sup> Fresh Facts: New Zealand Horticultural Exports 2021. <https://unitedfresh.co.nz/assets/site/Fresh-Facts-2021.pdf>

<sup>2</sup> Te Tai o Poutini Plan Section 42A Officer's Report Natural Features and Landscapes - Ngā Āhua me ngā Horanuku Aotūroa (para 237)

since they are enabled under NFL-P1, then the inclusion of rural production activities should be considered an appropriate amendment.

23. Amending NFL-R1 to include rural production activities futureproofs the plan to allow for new horticultural businesses to lawfully establish in the West Coast, to provide for access to locally grown, healthy food and to encourage low emissions industry.
24. HortNZ continues to seek the following amendment to NFL-R1:
  - (a) Maintenance, operation and repair of lawfully established buildings, structures, network utilities, renewable electricity generation activities, **rural production activities**, fence lines, drains, roads, regionally significant infrastructure and tracks within an Outstanding Natural Landscape described in Schedule Five or Outstanding Natural Feature described in Schedule Six.

### **Conclusion**

25. HortNZ seeks rules to support the policy providing for lawfully established horticultural activities in areas of Outstanding Natural Features and Landscapes. Thank you for your consideration.

**Emily Levenson**

**2 February 2024**