

SUBMISSION TO AUCKLAND COUNCIL ON THE DRAFT AUCKLAND PLAN 2050

TO: AUCKLAND COUNCIL
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1. Horticulture New Zealand’s (“HortNZ”) submission is detailed in the attached schedules:

Schedule 1: Horticulture in Auckland
 Schedule 2: Key issues for horticulture in the draft Auckland Plan 2050

2. Background to HortNZ and its RMA involvement:

2.1 HortNZ was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers’ and New Zealand Fruitgrowers’ and New Zealand Berryfruit Growers Federations.

2.2 The horticulture industry value is \$5.6 billion and is broken down as follows:

| | |
|-----------------------|----------------|
| Industry value | \$5.6bn |
| Fruit exports | \$2.81bn |
| Vegetable exports | \$615m |
| Total exports | \$3.4bn |
| Fruit domestic | \$960m |
| Vegetable domestic | \$1.26bn |
| Total domestic | \$2.2bn |

2.3 It should be acknowledged that it is not just the economic benefits associated with horticultural production that are important. The rural economy supports rural communities and rural production defines much of the rural landscape. Food production values provide a platform for long term sustainability of communities, through the provision of food security.

2.4 On behalf of its 5,600 active grower members Horticulture New Zealand takes a detailed involvement in resource management planning processes as part of its National Environmental Policies. Horticulture New Zealand works to raise growers’ awareness of the RMA to ensure effective grower involvement under the Act, whether in the planning process or through resource consent applications. The

principles that Horticulture New Zealand considers in assessing the implementation of the Resource Management Act 1991 (RMA) include:

- The effects based purpose of the Resource Management Act,
- Non-regulatory methods should be employed by councils;
- Regulation should impact fairly on the whole community, make sense in practice, and be developed in full consultation with those affected by it;
- Early consultation of land users in plan preparation;
- Ensuring that RMA plans work in the growers interests both in an environmental and sustainable economic production sense.

HortNZ confirms that it could not gain advantage in trade competition through this submission.

HortNZ thanks the Auckland Council for the opportunity to submit.

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SCHEDULE 1: HORTICULTURE IN AUCKLAND

3. The current state

- 3.1 Auckland is critical to New Zealand's food supply, producing a significant proportion of the nation's onions, tomatoes and potatoes. In 2016, Auckland produced for regional and national supply:¹
- 39% of New Zealand's tomatoes
 - 33% of New Zealand's cabbages
 - 32% of New Zealand's lettuce
 - 25% of New Zealand's broccoli and cauliflower
 - 19% of New Zealand's potatoes.
- 3.2 Pukekohe contains most of Auckland's versatile land for production. There are a number contributing factors to this versatility including high quality soil, water, frost free climate, shelter, access to labour, transport and markets.
- 3.3 The north facing, frost free areas of Pukekohe provide a productive advantage which supports year-round vegetable production. Because of this, Pukekohe is the sole supplier to the rest of New Zealand for certain vegetables (such as potatoes and lettuce) throughout the year.
- 3.4 The Pukekohe Vegetable Growers Association alone represents over 230 members. There are also a number of fruit growers based in south Auckland and a number of large glasshouse operations and organic fruit orchards in the north-west of Auckland.

4. Food security and the role for Auckland:

- 3.5 Population growth not only increases demand on housing supply, it also generates and necessitates an increased demand on food supply. There is a general assumption that New Zealand is the land of plenty and we will always have enough locally-grown food to feed our population, supplemented by imported food where there is demand.
- 3.6 But things are changing fast. Prime fruit and vegetable growing land is being squeezed by rapid growth in towns and cities and high demand for new housing. When supply is short and demand high, prices are subject to wide variations. This can potentially make healthy food unaffordable for many New Zealanders. We need to look closely at our domestic food supply and be sure that planning decisions are seen in the context of impacting the whole of New Zealand's food supply.
- 3.7 HortNZ have made projections around annual food volumes available for consumption in New Zealand². With New Zealand's population expecting to reach 5,045,000 by 2020 (based on annual growth between 1.5-2%), domestic food supply will not be able to sustain our future population consumption needs.
- 3.8 Our current consumption levels of fresh produce in retail and food service shows that net production is already below what is required for domestic consumption, meaning we can expect food shortages. This further highlights the importance of food security,

¹ New Zealand domestic vegetable production: the growing story. Horticulture New Zealand, 2017.

² Ibid.

land production and future-proofing the availability of resources to supply our growing population.

5. SCHEDULE 2: KEY ISSUES FOR HORTICULTURE IN THE DRAFT AUCKLAND PLAN 2050

5.1 This submission starts by commenting on the structure of the draft Auckland Plan 2050 (the “draft Plan”). While this may be considered out of scope, HortNZ considers it relevant to highlighting rural-specific outcomes. The following submission points relate to those questions linked to outcomes considered most relevant to the horticultural sector and related to the development strategy approach.

Plan Structure:

5.2 HortNZ supports a spatial plan approach that:

- limits future urban growth to within existing areas identified for urban development
- identifies core infrastructure required to support that growth, and
- sequences future growth dependent on availability of infrastructure.

5.3 Chapter 9 of the Auckland Plan 2012 is dedicated to Rural Auckland. The chapter outlines the relevance of rural communities and activities to wider Auckland. It highlights key issues and desired targets for growth and the priorities and directives to achieve those targets. Locating all the information within a singular place ensures the strategic direction for rural production is unequivocal.

5.4 The structure of the draft Plan disperses rural related matters throughout the plan. HortNZ is concerned that this will “water down” the significance of the rural community. There is a risk that key rural-issues will be overlooked within this framework, which is predominately focused on urban-growth.

5.5 The discussions supporting the directives and focus areas within the Outcome sections of the draft Plan are relatively high level. However, set within a strategic framework which is focused on urban growth there is little incentive to consider the relevance to, or impact on, the rural production industry. Or the chance to consider the potential of the rural sector in achieving those outcomes.

5.6 HortNZ believes that strategic management of rural growth (particularly the rural production industry) is equally important when considering urban growth. This is particularly so when considering the long-term provision of food for future communities.

5.7 Rural Auckland should have a specific outcome with directives and focus areas clearly articulated within the draft Plan. This will ensure that rural issues and the opportunities for rural development are clearly understood and are considered alongside urban issues/development. It will better manage the challenges between rural and urban development and be more likely to successfully achieve the vision outlined in the ‘Approach to rural growth’ section.

6. Outcome: Transport and access

Consultation question: *Moving easily around Auckland - people lack choice in how they get around and it can take a long time to get where they need to go. To better connect people and places, the Auckland Plan proposes an integrated transport system that accelerates progress on walking, cycling and public transport and makes better use of existing networks.*

Do you think the eight focus areas identified in Transport and access will achieve this?

- 5.5 HortNZ supports an integrated transport system that promotes alternative means of travel from private vehicles and better integrates land use and transport decisions. HortNZ supports the focus areas identified for the Outcome but notes that the discussions are generally more urban-focused.
- 5.6 Access to transport networks is paramount to ensuring local and national communities are provided with high-quality, fresh fruit and vegetables. Access to reliable transport networks is also crucial for the economic viability of horticultural operations.
- 5.7 Local and international markets demand high-quality produce. Disruptions to transport networks, such as congestion or blocked highways from flooding, can restrict access between fruit and vegetable hubs and their markets. This in turn results in loss of finance for growers, significant food wastage and reduced availability of produce for consumers.
- 5.8 Consideration should be had for the impact on rural roads as a result of increased traffic from new urban development. These rural roads are important networks for vehicles associated with rural production operations including large tractors and heavy freight trucks.
- 5.9 A key challenge facing activities that generate large numbers of heavy vehicle movements is ensuring that access routes are not compromised by sensitive activities locating in close proximity to these access routes.
- 5.10 In many cases, intensification of sensitive uses around key transport routes (whether they be State Highways, collector or local roads), has resulted in activities having their vehicle numbers limited to the detriment of economic growth. Such limitations can result in operations having to cease permanently.

7. Outcome: Environment and cultural heritage

Consultation question: *Protecting and enhancing our environment - unprecedented growth has required Auckland to provide for essential development, which has had an impact on our environment and cultural heritage. The Auckland Plan proposes utilising every opportunity to protect and enhance Auckland's environment as growth and development happens.*

Do you think the six focus areas identified in Environment and cultural heritage will achieve this?

- 7.1 HortNZ supports the emphasis placed on protecting natural resources and environments within a strategic plan for future growth. HortNZ also supports the need to build resilience in infrastructure and communities to cope with climate change.
- 7.2 The protection of elite and prime soils is recognised in the Development Strategy section of the draft Plan. This is supported by HortNZ. HortNZ considers it appropriate that these elite and prime soils be recognised within the Environment and cultural heritage Outcome as part of Auckland's significant environments and cultural heritage.
- 7.3 Figure 9.3: Location of versatile soils in the Auckland Plan 2012, maps the locations of Land Use Capabilities 1 – 4 across the region. This map has been removed from the draft Plan.
- 7.4 HortNZ recognises the intention of the draft Plan is that future development shall be focused within existing urban boundaries. However, the Operative Auckland Unitary Plan (AUP) provides a regulatory framework which allows for changes to the Rural Urban Boundary via a plan change process.
- 7.5 HortNZ seeks that figure 9.3 be retained within the draft Plan to highlight the significance of those soils and ensure any future changes to the Rural Urban Boundary do not further erode the productive capability of that land.
- 7.6 The horticulture industry has invested significantly in science and technology to improve the efficiency of production and water use and improve environmental outputs. It is recommended that Auckland Council actively engage the rural production industry when establishing outcomes and methods for managing resource use.

8. Outcome: Opportunity and prosperity

- 8.1 **Consultation question:** *Equipping people for future jobs - rapid technology advances will create challenges, opportunities and change across many industries and jobs. The Auckland Plan proposes Aucklanders will need to adapt to the coming changes by investing in education, training and skills development for all.*

Do you think the five focus areas identified in Opportunity and prosperity will achieve this?

- 8.2 HortNZ supports the focus areas identified within the draft Plan. Specific recognition should be had for the role of rural production activities in this section. Recognising and providing for the growth of rural production industries such as horticulture aligns with the identified focus areas and will assist in achieving the broader Directives of the Opportunity and prosperity outcome.
- 8.3 Rural production industries are at the forefront of technological and scientific innovation. The horticultural sector is increasingly making advances through the use

of technology such as GPS, remote sensing technology, digital imaging, drones, robotics, renewable energy engineering, molecular and micro-biology, organic chemistry, genetics, IT, programming, web design and support and social media. It also requires workers with skills in global marketing, languages, customer and financial services, truck driving, mechanics, qualified spray contractors and much more.

- 8.4 Succession planning for the owners of horticultural operations is also an important consideration. Although there are various networks within the sector to support young growers, HortNZ sees an opportunity for a partnership role with Auckland Council to help support young growers and incentivise development of the rural production industry.
- 8.5 In setting policies on rates and costs (such as s32 charges or development contributions), Council should be mindful of the implications these may have on incentivising opportunity and prosperity.

9. Development Strategy

Consultation question: *Do you think the proposed approach for enabling growth will effectively provide for Auckland's future?*

- 9.1 HortNZ generally supports the approach to rural growth outlined in the draft Plan. In particular, HortNZ supports:
- the approach of focussing development within land already identified for urban development, including countryside living, and away from economically productive areas
 - the recognition for management of land fragmentation and reverse sensitivity to ensure on-going rural production
 - the safeguarding of Auckland's land and soil resources, particularly elite and prime soils
 - the recognition of cross-boundary issues and the implications this has on resources.
- 9.2 HortNZ seek that reverse sensitivity should be *avoided* rather than "managed". The relevant operative provisions within the AUP are failing to provide adequate protection for the horticultural activities.
- 9.3 Continued failure to uphold or enforce measures to address reverse sensitivity are forcing horticultural operations to reduce, and often close, their operations. This will in the long run have implications for both local and national food supply.
- 9.4 Council staff need clear guidance and support to uphold provisions relating to reverse sensitivity. Methods to address reverse sensitivity effects should not be applied at the cost of the existing activity,
- 9.5 HortNZ notes and supports the inclusion of a section relating specifically to the Auckland horticultural sector. The horticultural sector contributes significantly to

Auckland's economy and is fundamental to the health and wellbeing of current and future communities.

- 9.6 There has also been a significant increase in the prevalence and development of the covered crops sector. Auckland contains 1,155 hectares of New Zealand's total 3,130 hectares of covered crops. This highlights the need to recognise and protect, not just land identified as elite and prime soils, but all rural land that is suitable for horticultural development.
- 9.7 The rural production industry and in particular, the horticultural sector, are growth industries. As outlined above, innovations in good management practices, science and technology demonstrate the clear role for horticulture in achieving strategic outcomes for Auckland Council.
- 9.8 However, there is a distinct lack of provision for the strategic growth of the rural production economy within the draft Plan. The focus centres on ensuring the 'on-going' or 'maintenance' of rural production activities. The draft Plan misses the opportunity to support the growth and development of rural industries.
- 9.9 HortNZ believes that the strategic management of rural industry growth is an important component to be addressed in the draft Plan.