

SUBMISSION ON

Whangarei Future Development Strategy

2 September 2024

To: Whangarei District Council

Name of Submitter: Horticulture New Zealand

Contact for Service:

Sarah Cameron

Senior Policy Advisor

Horticulture New Zealand

PO Box 10-232 WELLINGTON

Ph: 021 446281

Email: sarah.cameron@hortnz.co.nz

OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Submission

Our submission

Horticulture New Zealand (HortNZ) thanks Whangarei District Council for the opportunity to submit on the Future Development Strategy and welcomes any opportunity to continue to work with council and to discuss our 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

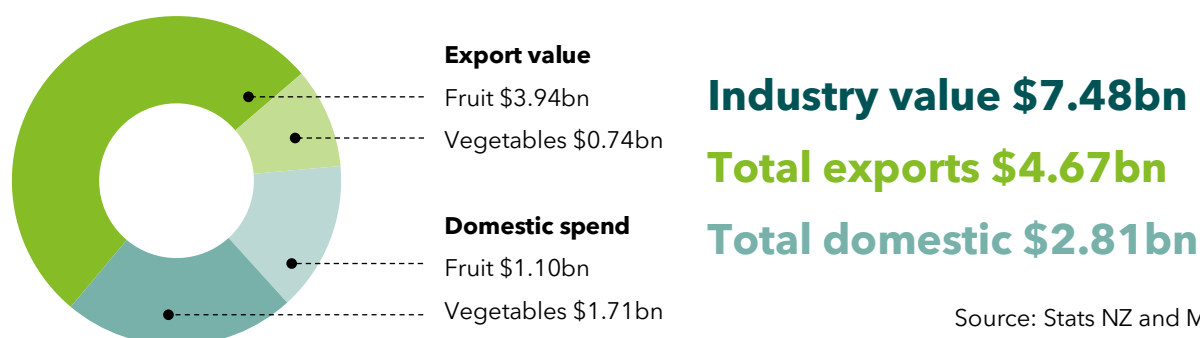
HortNZ represents the interests of approximately 4,200 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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 Whangarei

There are more than 4,849 hectares of horticultural activity within the Northland region, approximately 1500 hectares of which are within the Whangarei District.¹ The main crops are avocados; however, other crops, including kiwifruit, tamarillos, leafy green vegetables, citrus fruit, onions, berries and passionfruit, are also grown.

Horticulture in Whangarei is unique in that productivity of land is not necessarily hindered by lot size. HortNZ's evidence to the 2017 hearings on the Proposed Whangarei District Plan detailed the types, sizes, productivity and financial viability of avocado and kiwifruit orchards in the district.² It is clear that horticultural operations are capable of being economically viable on lots of 2-3ha.

Whangarei has good access to a number of factors that support successful horticulture; however, the biggest restraint is land supply. Due to historical regulatory frameworks, urban development is scattered throughout the rural environment, which limits the land available for primary production and also generates on-going reverse sensitivity issues. Another current constraint is the wider regional regulatory framework which is discussed further in the submission. These are all important factors for consideration when assessing the need and location of future greenfield development.

2. Future Development Strategy

HortNZ generally supports the intent of the strategy focusing on growth in existing areas and in existing growth nodes to avoid urban sprawl. However, we consider that recognition of rural needs, particularly relating to reverse sensitivity, would assist in strengthening direction to support future growth of primary production.

HortNZ has previously opposed the future urban areas and in particular the greenfield development areas in Kamo and Maunu, highlighting issues of:

- The productive capacity/capability of the land identified for future growth,
- The impact of the loss of that land to the wider values of highly productive land (such as food production), and
- The impact of converting that land to the productive capability of remaining rural land surrounding those future growth areas.

We remain concerned about reverse sensitivity at the rural-urban interface.

HortNZ supports the proposed objectives of the draft future development strategy but suggest the strategy would be improved with an objective that is specific to primary

¹ [Fresh-Facts---December-2023.pdf\(unitedfresh.co.nz\)](#)

² Statement of Evidence by Jerome Hardy for Horticulture New Zealand, 29 June 2017

production and particular food production values. The objective should address productive capacity and seek outcomes to:

- Protect highly productive land for land-based primary production and avoid reverse sensitivity,
- Provision land and water resources that support and enable food production activities,
- Enable land-use change and adaptation to respond to climate change, and
- Achieve a diverse, high value and sustainable rural economy.

The next section responds to specific questions from the survey and provides more commentary from HortNZ on specific sections of the Strategy.

2.1. Build in Existing Town Centres

By upgrading and developing established places like Te Kamo, Kensington and Ruakākā, we can support social and economic growth while also protecting farmland and the natural environment.

- The Future Development Strategy doesn't rely on any new town centres or suburbs.
- This allows us to get better value for ratepayers from existing infrastructure, like transport corridors and underground pipes, and reduces future costs for providing these services.
- Impacts of urban activities on large industrial, logistical and rural sites are reduced.

How strongly do you support this approach?

Do you have any other comments to add?

STRONGLY SUPPORT

HortNZ strongly supports the approach to upgrade and develop established places and that rural and coastal settlements are developed to existing planned capacity. This approach is consistent with the Whangārei District Development Principles stated on page 11 of the draft Future Development Strategy:

- Whangārei District's urban centres serve as hubs for local communities with new housing and services. This will be supported by infrastructure delivery aligned with the Primary Growth Corridor
- Whangārei District's rural and coastal settlements are developed to existing planned capacity and council investment ensure services are maintained or improved to meet the standards included in Council's Long-Term Plan
- There will be limited further urban expansion into rural areas.

The draft Future Development Strategy rightly identifies that the National Policy Statement on Urban Development 2022 (NPSUD) gives guidance on how growing cities and urban areas such as Whangārei can better manage growth outcomes. The intersect of growth at the urban/rural interface is also directed by the National Policy Statement for Highly Productive Land (NPSHPL). This is of particular importance to the Whangārei district given

the spatial extent of the highly productive land resource and contribution of primary production in the district to domestic food supply and export earnings.

However, the strategy should also recognise that due to historical sprawl and operational need, there is a lot of horticulture located in proximity to urban areas. Land that is identified as being highly productive should be protected and measures to manage reverse sensitivity should be strengthened to ensure avoidance in the first instance on established rural production activities and direct where mitigation might involve, for instance, the use of setbacks and buffers).

2.2. Strategic Objectives and Other Comments

The strategic objectives of this plan are on page nine of the draft Future Development Strategy:

- Resilient and equitable access
- Housing choices
- Lifting the lifeforce / mauri of our environment
- Cultural recognition
- Employment pathways
- Emissions reduction
- Resilient developments.

Do you have any other comments to add? This can be on any topic in the Future Development Strategy including the various maps

2.2.1. DISTRICT OVERVIEW MAP

The District Overview Map of the draft Future Development Strategy should be amended to identify the spatial extent of highly productive land as this is a key statutory determinant on growth management for the district.

The operative Whangarei District Plan already defines Highly Versatile Soils and an established policy and method suite to protect this valuable resource from inappropriate subdivision, use and development. This suite of provisions is copied below.

Definition	<i>Highly Versatile Soils: means Land Use Capability Classes 1c1, 2e1, 2w1, 2w2, 2s1, 3e1, 3e5, 3s1, 3s2, 3s4 as mapped in the New Zealand Land Resource Inventory.</i>
District Wide Matters	<p><i>District-Wide Matters</i></p> <p><i>DGD-RA-P1 Residential Activities</i></p> <p><i>To protect <u>highly versatile soils</u> from activities which would materially reduce the potential for soil-based rural production activities.</i></p> <p><i>DGD-RA-P4 Rural Lifestyle Zone</i></p>

	<p><i>To identify areas as Rural Lifestyle Zone to provide for a variety of rural lifestyle opportunities in the district without materially reducing the potential of the Rural Area for productive use of land by providing for the Rural Lifestyle Zone in locations that:</i></p> <p>...</p> <p><i>9. Do not materially reduce the potential for soil-based rural production activities on land with <u>highly versatile soils</u> or land with established rural production activities</i></p> <p><i>UFD-P13 Residential Zones</i></p> <p><i>To provide for a range of residential activities to accommodate the population growth of Whangārei District by applying:</i></p> <p><i>1. The General Residential Zone in locations that:</i></p> <p>...</p> <p><i>d. Do not comprise <u>highly versatile soils</u>, Outstanding Natural Landscapes or Features, High or Outstanding Natural Character, significant indigenous vegetation or high concentrations of archaeological sites.</i></p> <p><i>3. The Low-Density Residential Zone in locations that:</i></p> <p><i>c. Do not comprise <u>highly versatile soils</u>, Outstanding Natural Landscapes or Features, High or Outstanding Natural Character, significant indigenous vegetation or high concentrations of archaeological sites.</i></p>
--	---

The NPSHPL defines highly productive land as follows:

Highly productive land means land that has been mapped in accordance with clause 3.4 and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land).

The NPSHPL definition is broader than the definition of Highly Versatile Soils of the Whangareai District Plan.

We understand that Northland Regional Council has embarked on the regional mapping exercise to locally define and spatially identify highly productive land. In the absence of that information, we contend it prudent to adopt a precautionary approach and include in the District Overview Map on pages 14/15 and 30/31, highly productive land as per the NPSHPL definition.

2.2.2. INTRODUCTION

The introduction is silent on the current state of primary production in the district and its role in the long-term prosperity for Northland. This is an area of evidence HortNZ put significant work into through the Whangareai District Plan hearings (Plan Changes 85, 85A-85D) in 2017.

That evidence is again relevant here and should inform the district's approach to growth management and long-term prosperity objectives. We attach the 2017 evidence of:

- Jerome Hardy - Horticultural crop information³
- Bob Cathcart - Soils information⁴
- Stuart Ford - Economic considerations⁵

2.2.3. WHANGAREI DISTRICTS GROWTH CONTEXT

The 'Snapshot of Strategic Considerations Informing the Strategy', identifies two elements that relate to the protection of highly productive soils for future food and crop production:

- Urban development has expanded onto highly productive rural land
- Urban development is increasing the risks of land use incompatibility between residential and rural / industrial activities.

We note that a third element has also impacted on primary production in Whangarei which is the spatial extent and legacy provision of rural-lifestyle living particularly as they relate to the areas of:

- Maungatapere Kara Rd Sth
- Glenbervie - Kiripaka
- Apotu Rd
- Maungakamea.

2.2.4 STRATEGIC OBJECTIVES

These are urban focused and would be improved by describing the significance and role of rural areas for the future. This should consider how the district responds to:

- Its significant highly productive land resource
- District, regional and national contribution to domestic food supply and export earnings Employment pathways
- Climate change and land use change and adaptation
- The role of rural settlements and villages.

We suggest a new objective be included that is specific to primary production and particularly food production values under the heading "A Productive and Adaptable Rural Environment". As identified above, the objective should address productive capacity and seek outcomes to:

- Protect highly productive land for land-based primary production and avoid reverse sensitivity
- Provision land and water resources that support and enable food production activities
- Enable land-use change and adaptation to respond to climate change
- Achieve a diverse, high value and sustainable rural economy.

³ Statement of Evidence by Jerome Hardy for Horticulture New Zealand, 29 June 2017

⁴ Statement of Evidence by Bob Cathcart for Horticulture New Zealand, 29 June 2017

⁵ Statement of Evidence by Stuart Ford for Horticulture New Zealand, 28 June 2017

2.2.5 PRIORITY DEVELOPMENT AREAS - RURAL AND COASTAL SETTLEMENT AREAS

HortNZ supports the aim of the strategy to limit urban expansion into existing rural and coastal areas beyond what has already been zoned. For HortNZ and a number of growers, decisions under previous planning processes were of significant concern and threatened primary production. Future growth in rural and coastal settlements should remain limited to the existing zoning.

2.2.6 PRIORITY DEVELOPMENT AREAS - FUTURE URBAN ZONES

To reinforce the protection of highly productive land, HortNZ suggests that the map shown on Page 61 includes the spatial extent of highly productive land.

HortNZ has maintained consistent concerns with identified future urban zones and in particular that significant areas of highly productive land have been lost to urban growth and that productive activities are under pressure from reverse sensitivity.

With regards to the Manau area, there is considerable horticulture directly impacted by the growth area, and extensive horticulture along Cemetery Road and further west of Manau.

The Kamo growth area only directly impacts a few horticultural operations but again, there is further horticulture further west.

As urban activities develop at the rural-urban interface, growing activities become affected. For example, noise sensitive activities and associated district plan limits become applicable. Regional Air Plan controls on ground-based or aerial spraying undertaken within proximity of public and private spray sensitive areas becomes a constraint. Reverse sensitivity effects should be avoided with the Strategy setting out the approach to do so.

In both the Manau and Te Kamo instances and more generally, the Strategy is silent on the matter of reverse sensitivity effects on existing rural production and managing the rural-urban interface.

Submission on Whangarei District Council Future Development Strategy

Without limiting the generality of the above, HortNZ seeks the following decisions on the Strategy 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.

Provision	Support/oppose	Reason	Decision sought
Future Development Strategy	Support in part	HortNZ generally supports the intent of the strategy focusing on growth in existing areas, in existing growth nodes to avoid urban sprawl. However, we consider that recognition of rural needs, particularly relating to reverse sensitivity, would assist in strengthening direction to support future growth of primary production.	<p>Include objective that is specific to primary production and particular food production values and one that addresses productive capacity.</p> <p>Provide protections for reverse sensitivity at the rural-urban interface.</p>
Introduction	Support in part	The introduction is silent on the current state of primary production in the district.	Amend the introduction to include the importance of primary production to the district.
Build in Existing Town Centres	Support in part	The strategy should also recognise that due to historical sprawl and operational need, there is a lot of horticulture located in proximity to urban areas.	Amend so that land that is identified as being highly productive should be protected and measures to manage reverse sensitivity should be strengthened to ensure avoidance in the first instance on established rural

			production activities and direct where mitigation might involve, for instance, the use of setbacks and buffers).
District Overview Map	Support in part	The District Overview Map of the draft Future Development Strategy should be amended to identify the spatial extent of highly productive land as this is a key statutory determinant on growth management for the district.	Amend to identify the spatial extent of highly productive land.
District Growth Context	Support in part	The 'Snapshot of Strategic Considerations Informing the Strategy', identifies two elements that relate to the protection of highly productive soils for future food and crop production.	Include a third element in the 'Snapshot of Strategic Considerations Informing the Strategy' that covers the spatial extent and legacy provision of rural lifestyle living.
Strategic Objectives	Support in part	The strategic objectives are urban focused, and the narrative would be improved by describing the significance and role of rural areas for the future. This should consider how the district responds to its significant highly productive land resource.	<p>Include a new objective that is specific to primary production and particularly food production values under the heading "A Productive and Adaptable Rural Environment". The objective should address productive capacity and seek outcomes to:</p> <ul style="list-style-type: none"> • Protect highly productive land for land-based primary production and avoid reverse sensitivity

			<ul style="list-style-type: none"> • Provision land and water resources that support and enable food production activities • Enable land-use change and adaptation to respond to climate change • Achieve a diverse, high value and sustainable rural economy.
Priority Development Areas - Future urban Zones	Support in part	There are consistent concerns with identified future urban zones and in particular that significant areas of highly productive land have been lost to urban growth and that productive activities are under pressure from reverse sensitivity.	Include in the map shown on Page 61(future urban zones) the spatial extent of highly productive land.