

SUBMISSION ON

Draft Manawatū Growth Strategy 2024 - 2054

29 November 2024

To: Manawatū District Council

Name of Submitter: Horticulture New Zealand

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OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Executive Summary
- 3 Part 3: Submission

Our submission

Horticulture New Zealand (HortNZ) thanks Manawatū District Council for the opportunity to submit on the Draft Manawatū Growth Strategy 2024 - 2054 and welcomes any opportunity to continue to work with Manawatū 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

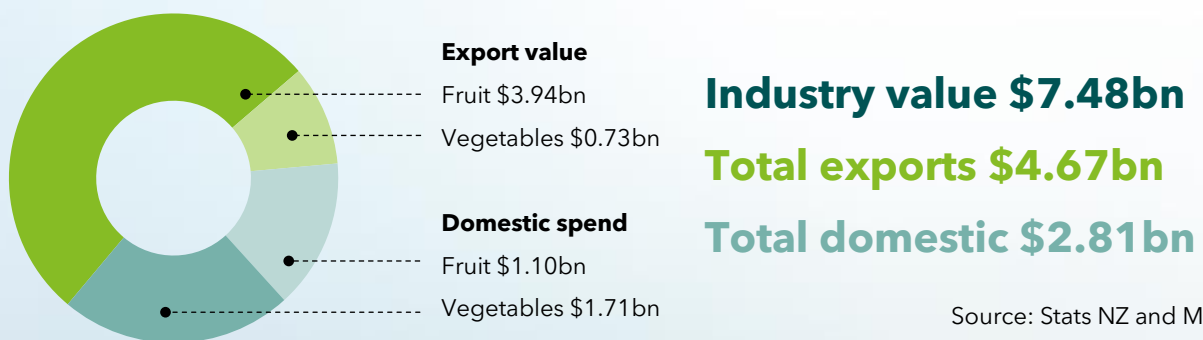
HortNZ represents the interests of approximately 4,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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.



Executive Summary

Submission

- HortNZ appreciates Manawatū District Councils efforts in creating a clear and succinct Growth Strategy for the community.
- It is important that reflected in the principles is the need to work with industry and growers to ensure plans include supportive settings to support horticulture and build resilience in planning to house and provide food to support a growing population.
- While there are reforms in progress and changes to the NPS HPL indicate that LUC 3 land may be removed from the default definition, this does not preclude Horizons Regional Council from including LUC 3 land, or some LUC 3 land, to be classed as highly productive land through their mapping process.
- HortNZ supports the approach to develop villages such as Kimbolton, Rongotea and Halcombe. This provides opportunity for people to live in a semi-rural location without having significant land carved up for lifestyle developments.

Submission

1. Horticulture in Manawatū

Manawatū District is located within the Manawatū-Whanganui Horizons region. This area plays an important role in the national food system.

There is a diverse climate within the region. This is because the region covers a large area, from the central plateau in the mid-North Island that has higher rainfall, snow and lower median average temperatures, to lower rainfall in the western coastal areas, more wind and a relatively higher median average temperature. Generally, the climate is considered mild and less prone to extremes than in other areas of New Zealand¹. The climate works well for many types of horticultural production, but the predominant land uses lend well to incorporating short-rotational cropping into farming systems. According to the Landcover database, there are 4558.7ha of horticultural crop land in the Manawatū District, with almost all of this, 4549.5ha, in short-rotational cropland².

Crops grown in the Manawatū District include brassicas, leafy greens, onions, pumpkins, butternut squash, peas, feijoas, asparagus, potatoes. The district plays an important role in the national food system.

The Manawatū District has long been recognised for its productive capacity and has a long history of growing in the area³. The soils and climate provide an ideal climate for growing a wide range of horticultural crops. This helped to support a robust pre-colonial economy with crops being traded with other communities outside the region⁴.

2. Horticulture needs

2.1. Land use, water and horticulture needs

It is the view of HortNZ and growers that the Future Growth Strategy (FGS) is an opportunity for Manawatū District Council to work closer with the horticultural community to understand what opportunities there are for highly productive land in the district.

Growers have been making progress on the uptake of good management practice, and HortNZ has been actively supporting growers prepare for Freshwater Farm Plans (FWFP)⁵. The practice adoption has been tracked through HortNZ's Growing Change project⁶ and has been focused on Horowhenua and Ohakune areas within the Horizons region. Some growers that are within the Manawatū District have also participated in the project. HortNZ believes FWFP and the use of industry programmes to support the uptake of Best Management Practices will be fundamental to achieving improvements in environmental

¹ [NIWA ManawatuWanganui Climate WEB.PDF](#)

² [LCDB v5.0 - Land Cover Database version 5.0, Mainland, New Zealand | LRIS Portal \(scinfo.org.nz\)](#)

³ [Early Māori history - Te Ara Encyclopedia of New Zealand](#)

⁴ [Heritage resources: Heritage \(doc.govt.nz\)](#)

⁵ [Freshwater Farm Plans | Horticulture New Zealand – Ahumāra Kai Aotearoa \(hortnz.co.nz\)](#)

⁶ <https://www.hortnz.co.nz/compliance/farm-planning/freshwater-farm-plans/>

outcomes and provide local authorities reassurance about any increase in horticulture in their area.

Freshwater use and access is important to consider in the context of the FGS as short rotational cropping is dynamic in both use of water and location. As land use classes are naturally occurring and a finite resource, it is important to consider land availability, capability and access to freshwater together to ensure development is occurring in such a way that it does not adversely or prevent horticultural production, which can occur through increased competition for resources such as freshwater and ensuring there is good infrastructure and plans in place to support rural productivity.

2.1.1. IRRIGATION

Water takes for irrigation of horticultural crops are used to supplement rainfall. Irrigation is used more frequently in the summer months when rainfall is lower, and typically less through the winter months. Irrigation of crops is matched to crop demand, and it is important to note that over-irrigation of a crop can be as problematic as underwatering a crop. Many factors influence how much water a crop will require, including type of crop, stage in growth cycle and climatic conditions.⁷ Generally, growers work within their local climate and environment to ensure crops receive adequate water to produce a marketable yield. It is important to note that water demand on a parcel of land is variable as short-rotational vegetable cropping practices mean soil health is managed by ensuring crops are rotated across different parcels of land to reduce soil, pest and disease pressure. Different crop types have different water and nutrient requirements.⁸

2.1.2. POST-HARVEST WATER REQUIREMENTS

Growers need to work within food safety and market requirements to ensure produce is safe and fit for human consumption.⁹ Food safety frameworks are incorporated into commercial accreditation programmes such as New Zealand Good Agricultural Practice (NZ GAP). One requirement is to test water for contaminants such as *E. coli*. It is important water used to wash produce is of a quantity and standard to ensure produce is clean and safe for consumers before it makes it to market. In addition to water testing and food safety processes within an operation, produce sold through retailers and markets is subject to random testing to provide consumers with confidence that the produce they purchase has been grown and produced in a way that it is safe to eat.

2.1.3. NATIONAL POLICY STATEMENT FOR HIGHLY PRODUCTIVE LAND

The National Policy Statement for Highly Productive Land (NPS HPL) came into effect October 2022. The NPS HPL is a blunt tool to manage appropriate use of land deemed highly productive (LUC 1, 2 & 3), primarily through the requirement for Councils to map and zone highly productive land, and manage the subdivision, use and development of this land.

Recent amendments to the NPS HPL provide clarity that greenhouse production is an appropriate activity on highly productive land¹⁰; however, it is important to consider the

⁷ [CHAPTER 2: CROP WATER NEEDS \(fao.org\)](#)

⁸ [Importance of Crop Rotation \(bayer.com\)](#)

⁹ [2019-07-24-Guidelines-for-Fresh-Produce-Food-Safety-2019-WEB.pdf \(hortnz.co.nz\)](#)

¹⁰ [NPS-HPL-with-2024-Amendments.pdf](#)

full range of activities required that make land productive. This includes access to freshwater and consideration of facilities such as post-harvest facilities that prepare fresh produce according to food safety and market specifications. If there is potential for horticulture activity to increase in the district it is important to consider all the needs that growers require to get produce from paddock to market.

HortNZ supports the position indicated by Manawatū District Council that there may be changes required once the governments legislative reform process, including the NPS HPL, have been made public.

2.1.4. NATIONAL DIRECTION AND SUPPORT FOR HORTICULTURE

The NPS HPL provides a clear direction about how to protect highly productive land for land-based primary production. As currently drafted, the NPS HPL does not distinguish between LUC 1, 2 or 3 land as needing different levels of protection and treats these classes equally in recognition of the productive capacity of this land.

Minister Parker's letter to regional councils sent in April 2023 sought information about how vegetable growing is being provided for in NPSFM plans.

The National and Built Environment Act select committee reports recommended the NBA must provide direction on enabling supply of fresh fruit and vegetables.¹¹ While this legislation has been repealed, the recognition of the vulnerability to our domestic food supply and the role of horticulture being recognised as critical for supporting the health and needs of the population is unchanged.

In addition, the Aotearoa Horticulture Action Plan seeks to provide a framework to grow the value of the horticulture industry to \$12 billion by 2035.¹² This is a 'quadruple helix' strategy that involves a combination of effort between industry, government, Māori and growers.

HortNZ believes there is clear support for the horticulture industry and ensuring domestic vegetable production is provided for when developing plans and documents that guide the future of regions. HortNZ is mindful that the Future Proof Strategy will inform other planning documents and have a direct impact on land use.

If the ultimate higher purpose is to create plans for the future that help guide development and how our population will be housed, where they will grow and be supported, it is critical the following are considered:

- Climate change adaptation and opportunities;
- Land use change;
- Horticulture's potential and role in transitioning to low emissions economy; and
- Regional growth and development: how we feed the growing population and support populations through employment opportunities.

¹¹ [404 Not Found - New Zealand Parliament \(www.parliament.nz\)](http://www.parliament.nz)

¹² [Growing together 2035 - Aotearoa Horticulture Action Plan \(February 2023\) \(mpi.govt.nz\)](https://mpi.govt.nz/growing-together-2035-aotearoa-horticulture-action-plan-february-2023/)

The FGS needs to provide structure and guidance on how regions will grow and where urban and housing development will occur. There needs to be balance between development of land and production on the land to support the population. The FGS needs to balance the NPS UD with the NPS HPL to ensure production and urban development are considered together.

Land is a finite natural resource that needs to be managed to meet the needs of people now and those of future generations. In our view, sustainable food production is the primary value associated with this resource.

Highly productive land is made up a combination of natural and physical resources, and these together with social, legal and investment decisions define the potential productive capacity of land. There are many elements that contribute to the productive capacity of land, but land itself is the primary aspect. When land is fragmented or urbanised it is seldom returned to productive uses.

Policies to manage ad-hoc urban and lifestyle development are essential to maintain highly productive land resource for future generations. Highly productive land is a finite resource and intergenerational asset that is under threat in New Zealand – most significantly due to urban development, as reported in ‘Our Land 2021’ which states that the area of HPL that was unavailable for horticulture because it had a house on it increased by 54% from 2002 to 2019.¹³

The values of highly productive land and potential costs and benefits of enabling and/or allowing urban expansion onto highly productive land should be specifically considered as part of the process of identifying areas that may be appropriate for future expansion. The impact of losing that land to primary productive use is a matter that should be specifically investigated, and those findings then considered, alongside other relevant matters, when decisions about areas that are potentially suitable for future urban expansion are made.

HortNZ do not consider it acceptable to continue to support the loss of highly productive land to urban use when a National Policy Statement is in place and other options are available to address urban growth needs. The food security of the region and nation should not be compromised

3. Draft Future Growth Strategy

HortNZ appreciates Manawatū District Councils efforts in creating a clear and succinct Growth Strategy for the community.

3.1. Planning for growth in the Manawatū

HortNZ supports the approach taken by Manawatū District Council in preparing the FGS. The challenge will be how Manawatū District can provide for an increasing population in a predominantly rural district. This is an opportunity to balance the need for extra housing, identify areas for intensification within boundaries and identify areas in the district that are not on land considered highly productive, nor in flood risk zones. HortNZ recognises that

¹³ Our Land 2021. Ministry for the Environment.

Manawatū District Council are awaiting on information from Horizons Regional Council to help inform the FGS about flood risk areas. While areas may be deemed unsuitable for housing due to flood risk, they can still be appropriate for primary production activities and HortNZ would encourage Manawatū District Council to consider this in their plans.

HortNZ notes there is no plan for a dedicated rural lifestyle zone and where this would be appropriately located. Considering a large proportion of development over the period 200 - 2023 included rural lifestyle subdivision, and the National Planning Standards anticipate rural lifestyle subdivision development, there is a need to provide for a rural lifestyle zone as reverse sensitivity effects can be better managed as opposed to pepper-potting lifestyle developments throughout the district.

3.2. Strategic Direction

Planning for a growing population requires consideration of not only housing and infrastructure requirements, but also how that population will be supported.

3.2.1. PRINCIPLES

It is important that reflected in the principles is the need to work with industry and growers to ensure plans include supportive settings to support horticulture and build resilience in planning to house and provide food to support a growing population.

Outcome sought:

Add new guiding principles as follows:

Food Security

1. Protect highly productive land for land-based primary production by avoiding rural lifestyle and urban rezoning except as provided for in the NPS HPL.
2. Food production, food supply and food security relate to essential human health needs which are to be provided for through the allocation and sustainable management of natural and physical resources.
3. Enable and encourage land use change to lower emission food production systems.

3.2.2. CONTEXT

HortNZ supports the approach taken by Manawatū District Council which identifies the increase in lifestyle developments on highly productive land.

There are opportunities to intensify within existing urban boundaries and existing lifestyle developments that have already occurred on highly productive land. HortNZ notes there are stormwater upgrades to systems in Feilding and villages. There could be an opportunity to further future proof the town and village networks with upgrades to wastewater and drinking water within these areas to provide for an increase in population.

HortNZ recognises that Manawatū District are still awaiting flood risk modelling information to inform planning documents, and this may impact where is deemed

appropriate for urban development. While some land may be deemed inappropriate for urban development due to risk of flooding, it can still be useful for primary production activities such as short-term rotational cropping.

3.2.3. KEY DEPENDANCIES

HortNZ supports Manawatū District Council's position on highly productive land, and we believe this reflects the intent of the NPS HPL. The development of Te Utanganui Central Distribution hub and the Palmerston North Integrated Transport Initiative provide more opportunities for rural production to transport produce to larger centres.

While there are reforms in progress and changes to the NPS HPL indicate that LUC 3 land may be removed from the default definition, this does not preclude Horizons Regional Council from including LUC 3 land, or some LUC 3 land, to be classed as highly productive land through their mapping process.

3.3. Strategic growth priorities

HortNZ is supportive of a more planned approach to urban development in the rural areas. In this way, Manawatū can then be more considered about where urban development can occur and how this can be done to preserve the integrity of highly productive land and make more cost-effective decisions about infrastructure.

Consideration of how rural/urban boundary issues will be managed can also be planned for at the same time. This includes considering appropriate buffer zones and other features that could both add to the amenity of an urban area and mitigate reverse sensitivity issues.

HortNZ supports the approach to develop villages such as Kimbolton, Rongotea and Halcombe. This provides opportunity for people to live in a semi-rural location without having significant land carved up for lifestyle developments.

3.4. Growth maps

The growth maps provide helpful context about how development will occur. HortNZ notes that the maps indicate growth plans either side of the Orua River and feel this may be an area that will be identified through the Horizons flood risk mapping exercise as an area with a higher risk of flooding.

HortNZ notes in Appendix 2: Growth snapshot that 70% of the rural titles created between 2000 - 2023 were on highly productive land. HortNZ appreciates Manawatū's approach in the 2024 - 2054 plan to actively look for ways to avoid development on highly productive land.