

SUBMISSION ON

Wellington Future Development Strategy

25 October 2023

To: Wellington Regional Leadership Committee

Name of Submitter: Horticulture New Zealand

Contact for Service:

Emily Levenson

Environmental Policy Advisor

Horticulture New Zealand

PO Box 10-232 WELLINGTON

Ph: 027 305 4423

Email: Emily.levenson@hortnz.co.nz

OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Submission
A response to the consultation questions

Our submission

Horticulture New Zealand (HortNZ) thanks the Wellington Regional Leadership Committee for the opportunity to submit on the Wairarapa-Wellington-Horowhenua Future Development Strategy and welcomes any opportunity to continue to work with the Wellington Regional Leadership Committee 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 4,200 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruit, 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

Discussion Questions

Q. 1 Do you support our vision and strategic direction that guides the draft Future Development Strategy?

SUPPORT

HortNZ supports minimising impacts on food producing areas, which is included under the “Protecting what we love” pillar of the Strategic Direction.

Minimising impacts on food production looks like:

- Protecting highly productive land (HPL) from inappropriate subdivision, use and development;
- Enabling the supply of fresh fruits and vegetables in line with Clause 129 of the NBEA; and
- Minimising reverse sensitivity effects of future development through housing setbacks, buffer zones, and appropriate separation between urban and rural production areas.

HORTICULTURE IN THE WAIRARAPA-WELLINGTON-HOROWHENUA REGION

In the Wellington region, there are 94+ ha of vegetables, a small area of indoor crops and 369 ha of fruit (excluding wine grapes but including 169 ha olives which HortNZ does not represent).¹ The majority of growing in the region is located in the Wairarapa and Ōtaki. The Wairarapa predominately grows apples and pears with small areas of other fruit trees, outdoor vegetables and vegetable seed production. The growing of pea plants and pea straw in the Wairarapa were banned following the discovery of pea weevils in 2016/17; this ban was lifted in February 2020. Ōtaki predominately grows outdoor vegetables and indoor crops. There is very little horticulture in the Porirua City, Upper Hutt City, Lower Hutt City and Wellington City areas.

Horowhenua is home to one the country’s largest vegetable growing areas which supplies most of the fresh vegetables to the Wellington Region. Horowhenua is a Specified Vegetable Growing Area (SVGA), which means that it is recognised for its importance in producing fresh vegetables for national food supply. There are approximately 3,300 ha of horticultural land in the Manawatū-Whanganui region, approximately 3,000 ha of which is planted in vegetables. Horticultural crops include potatoes, broccoli, lettuce, onions, peas, silverbeet, carrots, asparagus, cauliflower, cabbage, pumpkin and kiwifruit.²

¹ Fresh facts 2023, Accessed online <https://unitedfresh.co.nz/technical-advisory-group/fresh-facts>

² Fresh facts 2023, Accessed online <https://unitedfresh.co.nz/technical-advisory-group/fresh-facts>

Q. 2

Do you support our proposal to prioritise housing development in our existing towns and cities and around our strategic transport network ie around current and future transport hubs and routes?

SUPPORT

We support the emphasis on building up existing towns and cities rather than focusing on greenfield development. This approach protects our highly productive land for primary production, particularly food production. In general, it is not appropriate to develop any land that could be used for primary production.

We advocate caution in developing in Ōtaki, the Wairarapa, and Levin to ensure that our local food production is not adversely impacted, and highly productive land is protected for future food production.

WELLINGTON REGION

Within the region, Land Use Class (LUC) 1-3 soils - which are generally the most suitable for horticulture - are concentrated around the plains of the Wairarapa and Ōtaki.³ This has been identified in the Wellington Regional Growth Framework. The vegetable growing industry in Ōtaki has declined in recent years due to fragmentation. Historically, there was market gardening in Wellington City and Lower Hutt, but it was lost due to urban development.

With the predicted effects of climate change, the Wairarapa Food Story report suggests that the climate in the Wairarapa may mirror Hawkes Bay (a predominant horticultural area) by 2040.⁴ This report highlighted a *'shared belief was that the Wairarapa could be the food bowl for Wellington'*.

While external factors, such as the market and availability of water, will ultimately determine the future of horticulture in the Wairarapa, there is potential for the industry to grow.

HOROWHENUA DISTRICT

Vegetable growers in Horowhenua grow the vegetables needed to feed Wellington's population. Horizons Regional Council is currently in Environment Court over Plan Change 2, which made it near impossible to consent vegetable growing, a huge blow to food security for the Lower North Island. It is critical that future housing development does not exacerbate this situation and threaten Wellington's main supply of fresh vegetables.

Levin is a rural hub and a support/supply town for the rural community in Horowhenua and Southern Horizons, not just a commuter town. Both can be true, but the Future Development Strategy needs to recognise both.

REGULATORY PRESSURE ON RURAL COMMUNITIES

There is a significant amount of regulatory change in progress affecting the rural community in the Wairarapa, Wellington and Horowhenua, including the Combined

³ https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Capability/lri_luc_main/421.406.404

⁴ Wairarapa Food Story Group: Wairarapa Food Story, available at <https://wairarapafoodstory.nz/wp-content/uploads/2018/09/Food%20Story%20LR.pdf>.

Wairarapa District Plan, Plan Change 1 to the Wellington Regional Policy Statement, Plan Change 2 to the Horizons One Plan, and the Freshwater Farm Plan Regulations to name a few. Some of this regulatory change is within the scope of members of the Wellington Regional Leadership Committee and some is external, but it is important to be mindful of this swathe of changes before adding pressure on rural communities with proposed greenfield development.

Q. 3 Do you support our proposal to prioritise business development in our existing towns and cities and around our strategic public transport network ie around current and future transport hubs and routes, to provide for sustainable, local employment?

SUPPORT

HortNZ supports urban intensification rather than greenfield development. We also support strong bus and train upgrades along development corridors to support commuters. Rural roads do not have the capacity for a massive increase in drivers with the rise in housing development. Public transit will ease the burden on the roads. Horticultural businesses need continuous road access to truck produce to packhouses and to market.

Q. 4 Do you support our proposed approach to invest in infrastructure that is located in existing towns and cities and around current and future transport hubs and routes?

SUPPORT

HortNZ support the goals of intensification rather than urban sprawl, and infrastructure improvements will support new housing developments. We also advocate for infrastructure improvements in rural areas to support the movement of fresh produce to supply the domestic market. Rural roads are essential to move fruits and vegetables to packhouses and to market. These products are highly perishable and must be moved quickly to keep them fresh. Rural roads should be well-maintained and upgraded at pace with other infrastructure upgrades. Electricity infrastructure in rural areas will be crucial to help rural businesses decarbonise.

Q. 5 Do you support our proposed approach to protect the areas we love by avoiding or limiting urban development in areas that prone to natural hazards, land that is highly productive or land that contains high cultural or environmental/biodiversity values?

SUPPORT

HortNZ strongly supports that highly productive land is protected from urban development. This is also a requirement under the National Policy Statement for Highly Productive Land (NPS-HPL), not just a desirable outcome.

We are concerned that the definition of “highly productive land” (HPL) in the draft FDS is in contradiction with the NPS-HPL. The FDS defines HPL as “land used in land-based primary production” (p. 30). If this definition were used, it would fail to protect our

precious soil resources for future generations, even if the land is not currently in use for primary production. This is counter to the purpose of the national policy statement.

The NPS-HPL has one objective, "Highly productive land is protected for use in land-based primary production, both now and for future generations."

HortNZ recommends adopting a new definition of HPL in line with the NPS. Until HPL is mapped in the region through a Schedule 1 process, the NPS-HPL directs that highly productive land is defined as land that, at the commencement date (17 October 2022):

- a) "is
 - i. zoned general rural or rural production; and
 - ii. LUC 1, 2, or 3 land; but
- b) is not:
 - i. identified for future urban development; or
 - ii. subject to a Council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle."

We are concerned that LUC 3 land east of Levin is designated for future urban development. (p. 37) While we recognise that this area is zoned for intensification under Proposed Plan Change 4 to the Horowhenua District Plan,⁵ it is important to consider the impacts of intensifying up to the urban/rural boundary. Reverse sensitivity effects and strains on rural transport networks must be proactively managed.

The areas designated for greenfield development outside of Masterton next to Chamberlain Rd and in Carterton East are LUC 2 and 3, but they were designated future urban in the 2021 Regional Growth Framework.⁶ These areas are on the town edge, so there is potential for reverse sensitivity conflicts. It would be more pragmatic to intensify within the town boundary rather than pushing urban encroachment.

Policies 5 and 6 of the NPS-HPL mandate that urban and rural lifestyle rezoning and development of HPL is avoided, except as provided for in the NPS. Policy 8 protects HPL from inappropriate use and development, and Policy 9 directs that "Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land."

Horticultural operations produce noise, smells and vehicle movements that are all appropriate for rural areas. Housing development must be planned to prevent land use conflicts where new neighbours move adjacent to horticultural areas and complain when the normal characteristics of a rural working environment differ from their expectations.

⁵ Accessed online [Proposed Plan Change 4: Taraika Growth Area - Horowhenua District Council](#)

⁶ Accessed online [Wellington Regional Growth Framework Report JULY 2021 \(wrgf.co.nz\)](#) (p. 37)

Q. 6 How do you think we can best support the values and aspirations of Māori in our region through the implementation of the Future Development Strategy?

n/a

Q. 7 Do you have any other feedback on the draft Future Development Strategy?

We are unsure what statutory authority this Future Development Strategy has over the Horowhenua District, since Horowhenua is within the Manawatū-Whanganui region, not the Wellington Region. Any future planning for the district should include participation from the Horizons Regional Council to ensure that plans between different authorities do not create duplication or contradictory direction.