

SUBMISSION ON

Proposed Plan Change 1 – Natural Hazards

26 June 2023

To: Whangarei District Council

Name of Submitter: Horticulture New Zealand

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OVERVIEW

Submission structure

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Our submission

Horticulture New Zealand (HortNZ) thanks Whangarei District Council for the opportunity to submit on proposed plan change 1.

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 5,500 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 is 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 is more than 4,400ha of horticultural activity within the Northland region, approximately 1500 hectares of which is within the Whangarei District. The main crop is avocados, however other crops including kiwifruit, tamarillos, leafy green vegetables, citrus fruit, onions, berries and passionfruit, are also grown.

Whangarei has good access to a number of the factors that support successful horticulture. The biggest restraint is land supply. Due to historical regulatory frameworks, urban development is scattered throughout the rural environment. This limits the land available for primary production, but also generates on-going reverse sensitivity issues.

2. General Comments

Artificial crop protection structures (ACPS) and Crop support structures (CSS)

HortNZ supports the inclusion of ACPS and CSS in NH-R5 however seeks relief to exempt ACPS and CCS from NH-R13.

In the absence of specific rules, it appears that these structures would be captured by the rules managing 'buildings and major structures'. ACPS/CSS do not have a 'gross floor area', are not a habitable building or a vulnerable activity. We seek a specific exclusion.

3. Terminology

The plan uses 'farming' as well as 'primary production'. Hort seeks consistency with the national planning standards and for the correct terminology 'primary production' to be used. This is defined as:

means:

(a) any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and

(b) includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);

(c) includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but

(d) excludes further processing of those commodities into a different product.

Submission on Plan Change 1

Without limiting the generality of the above, HortNZ seeks the following decisions on Plan Change 1 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.

Additions are indicated by bolded underline, and deletions by strikethrough text.

Provision	Support/oppose	Reason	Decision sought
NH-R5 Non habitable Buildings and Major Structures in 100-year flood hazard and areas of moderate or high susceptibility to land instability hazards	Support in part	<p>The use of the word 'farming' doesn't encompass other rural production land uses. HortNZ supports using the National Planning Standards definition of 'primary production'</p> <p>means:</p> <p>(a) any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and</p> <p>(b) includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);</p> <p>(c) includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but</p> <p>(d) excludes further processing of those commodities into a different product</p>	<p>Amend NH-R5</p> <p>b. Is associated with farming <u>primary production</u> and located within the Rural Production Zone, with a gross floor area less than 100m²</p>

		<p>Terminology in the operative district plan used is 'primary production'.</p> <p>HortNZ supports the inclusion of artificial crop protection structures and crop support structures</p>	
NH-R8	Support in part	Artificial crop protection structures do not have a gross floor area therefore it is unclear if they meet the PER activity status for NH-R8	<p>Include</p> <p><u>Note: Artificial crop protection structures and crop support structures are permitted</u></p>
NH-R12	Support	HortNZ supports the provisions which allow for the clearance and removal of diseased vegetation through c) and earthworks h) and for the provision of earthworks	Support
NH-R13	Support in part	ACPS/CSS do not have a 'gross floor area', therefore (1) is not applicable. Nor is (2) applicable(as these are not a vulnerable activity). The status of ACPS and CSS is therefore unclear. We seek that an exclusion is specifically stated - so that ACPS and CSS are permitted	<p>Amend</p> <p>Compliance Standard: 1. Crop protection structures and artificial crop protection structures are exempt from NH-R13</p>

<p>CH-R5 Non habitable Buildings and Major Structures</p>	<p>Support in part</p>	<p>The use of the word 'farming' doesn't encompass other rural production land uses. HortNZ supports using the National Planning Standards definition of 'primary production'</p> <p>means:</p> <p>(a) any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and</p> <p>(b) includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);</p> <p>(c) includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but</p> <p>(d) excludes further processing of those commodities into a different product</p> <p>Terminology in the operative district plan used is 'primary production'.</p> <p>HortNZ supports the inclusion of artificial crop protection structures and crop support structures</p>	<p>Amend CH-R5</p> <p>b. Is associated with farming primary production and located within the Rural Production Zone, with a gross floor area less than 100m²</p>
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