

10 October 2019

Submission on the Proposed National Policy Statement for Highly Productive Land

Vegetables New Zealand Inc and Process Vegetables New Zealand advocates for and represents the interests of New Zealand's 700 vegetable growers. The vegetable industry is valued at over \$500m with over \$50m in exports annually (Fresh Facts, 2018).

The industry employs over 5,000 people, occupies some 50,000ha of land and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury and Central Otago.

New Zealand growers supply fresh vegetables to domestic consumers, as well as exporting fresh products to discerning consumers globally.

Vegetables NZ Inc submits that:

General considerations

Vegetable growers are stewards of the land and often are part of multi-generational family businesses. They are very passionate about growing fresh healthy food in the best possible way for their communities and regions. Vegetable growers add a positive contribution to the community and the economy. The best way to grow vegetables and fruit is on the best land. Vegetable production has occurred in close proximity to population centres for many years. Over time, the increase in New Zealand's population has resulted in urban creep. In many cases this has caused highly productive land (HPL) used for vegetable production to be repurposed into housing for growing urban centres. This has seen the transition of well-established rural communities into smaller urban centres and satellite towns of large cities. In recent times, pressure to urbanise HPL through sub-divisions, houses, industrial parks and schools has highlighted the tension between creating housing and accommodation of a growing population, and the ability to grow produce to feed this same population. Where urban development is located next to horticulture, the productive capacity of the land can be diminished. We need careful consideration of **established** horticultural activities when planning for urban development close to HPL.

Growing vegetables profitably requires a number of natural and man-made elements. The natural elements are water, soil and temperature / climate. The man-made elements for successful growing production are nutrient, infrastructure, markets and operations. To remove one of the elements from the basket of elements will have an effect on the productive capacity of the land. Where urban development is planned next to productive land the net result is a change in one or more of the elements. For example, the spraying of crops next to houses will result in tension between urban dwellers and producers. This in turn limits the operations of the business. Where these changes substantially reduce the productive capacity of the land, it could be prudent to change the land use from highly productive land to permit other uses. This is the opposite of what is trying to be achieved by the HPL NPS. Vegetable growers support good planning to allow growing and houses to coexist.

Vegetable growers also ask the government to give consideration to the outcome of the Freshwater NPS currently being consulted on in regards to the treatment of HPL. We recognise these are separate documents, however their combined impact, particularly the Freshwater NPS, could result in the discontinuation of vegetable production in New Zealand. There is a danger that large tracts of HPL could be left unable to be sold/developed or used for horticultural production if both NPS are implemented in their most restrictive forms.

Specific considerations

1. Vegetable growers depend on highly productive land and other resources to **grow food for New Zealanders** and for export.
2. Growers are affected by complaints when urban and lifestyle development and sensitive activities locate close to their operations. These complaints can reduce the ability of growers to use their land for growing food.
3. We support policy for a planned approach to urban and lifestyle development.
4. When planning urban and lifestyle development, we support a policy to maintain the productive capacity of Highly Productive Land. Moreover, we do not support inappropriate use and fragmentation of land that can sustain viable commercial vegetable production operation.
5. The productive capacity of Highly Productive Land should additionally be measured by the economic, social and cultural contribution of the land.
6. The productive capacity of land is dependent on natural and physical resources such as soil, climate, water and infrastructure. It is also dependent other factors including nutrient allocation policy and labour.
7. Maintaining the productive capacity of land must consider all relevant factors relating to the lands productivity.
8. Some land with good soils and a favourable climate, may not be highly productive because of other constraints. For example: due to fragmentation. The National Policy Statement for Highly Productive land should not prevent urban or lifestyle development, on land that is not high productive capability due to significant constraints. Constraints could include, but not limited to, access to water, buffer limits (size), cross boundary effects (noise), access to land (roadways and vehicle size) and harvest period constraints (hours of operation).
9. We support activities that enhance the productive capacity of HPL being located on HPL. For example, greenhouse growing, packing sheds, post-harvest facilities, distribution infrastructure may enhance the productive capacity of outdoor growers.
10. We support using incentives to improve the productive capacity of land, and in some cases, this could provide for the development of land identified as Highly Productive Land. For example, transferable development rights in exchange for title aggregation.
11. We support policies to reduce reverse sensitivity issues. In most cases the grower has been on the land before the encroachment of urban development. It therefore stands that any development of a reverse sensitivity mitigation should be part of the subdivision activity. For example, requiring effective buffers from sensitive activities at the rural urban boundary and **within** a developer's site.
12. **While Vegetables NZ and Process Vegetables NZ have supported the proposed NPS for HPL through this consultation, our overall view is that a National Environmental Standard (NES) specific to commercial vegetable production would be preferable. This will enable a comprehensive, considered approach specific to our industry.**

Conclusion

We support the need to protect HPL, however this must be balanced with flexibility to utilise the land for other uses where horticultural production is no longer viable.

This submission is supported by:

1. Process Vegetables New Zealand
2. Northern Wairoa Vegetable Growers Association

References:

Fresh Facts (2018), New Zealand Horticulture 2018. Accessed online: <https://www.freshfacts.co.nz/files/freshfacts-2018.pdf>

<https://www.mfe.govt.nz/consultation/proposed-nps-highly-productive-land/>

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