SUBMISSION ON

Plan Change 1 to the Natural Resources Plan

15 December 2023

To: Greater Wellington Regional Council
Name of Submitter: Horticulture New Zealand

Contact for Service:

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Horticulture™ New Zealand
Ahumāra Kai Aotearoa

OVERVIEW

Submission structure

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Our submission

Horticulture New Zealand (HortNZ) thanks Greater Wellington Regional Council for the opportunity to submit on PC1 to the Natural Resources Plan and welcomes any opportunity to continue to work with Greater Wellington Regional 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.

PART 1

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.

Export

Fruit $4.04bn

Vegetables $0.64bn

Domestic

Fruit $0.93bn

Vegetables $1.34bn

Industry value $6.95bn

Total exports $4.68bn

Total domestic $2.27bn

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.

PART 2

Submission

1. Horticulture in the Wellington Region

There are over 94ha of vegetables, a small area of indoor crops and 369 ha of fruit in the Wellington region. The majority of growing in the region is located in the Wairarapa and Ōtaki areas. 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.

2. Proposed PC1 to the Natural Resources Plan

While PC1 is primarily related to Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua which are mostly urban, HortNZ believes that it is relevant to comment on how these provisions would affect horticulture, with the expectation that similar provisions will be extended to the other whaitua in the region, including those that are more rural.

3. Rural land use change

Proposed rules restricting rural land use change would make crop rotation impossible, which is an essential horticultural management practice for soil health and reducing disease pressure. Crop rotations often include a pasture window, which means that the same site of land will change from pastoral use to vegetables and back again. Planting vegetables or cover crops with differing nutrient needs in succession can reduce fertiliser requirements. For instance, legumes bring atmospheric nitrogen into the soil, making it available for the next crop.[1]

There may also be circumstances when it is appropriate to change rural land use from low intensity horticulture (orcharding) to other horticultural use (vegetable growing). For instance, after orchards were destroyed during Cyclone Gabrielle, growers should have been able to grow vegetables for stopgap income while they rebuilt. A permitted activity status for a change from horticulture to horticulture and for crop rotation is more appropriate.

A change of pastoral land use to horticulture, including vegetable growing, is also a positive outcome for reducing regional greenhouse gas emissions and should be enabled to achieve regional emissions targets.

Existing national direction does not restrict the conversion of land to horticulture due to freshwater concerns. In fact, vegetable growing is recognised as nationally significant through Specified Vegetable Growing Areas in the National Policy Statement for Freshwater Management (Clause 3.33).[2] The National Environmental Standards for Freshwater control

[1] https://www.vegetables.bayer.com/nz/en-nz/resources/growing-tips/importance-of-crop-rotation.html
[2] Ministry for the Environment. National Policy Statement for Freshwater Management 2020. https://environment.govt.nz/assets/publications/National-Policy-Statement-for-Freshwater-Management-2020.pdf.

intensification to dairy farming, but not other activities.[3] Under Section 32 of the RMA, provisions must be evaluated based on whether they are efficient and effective at achieving objectives.[4] The land use change rules are blunt instruments that will be neither efficient nor effective – a targeted approach based on catchment contaminants and targeted mitigations for the highest contributing activities is more appropriate.

Vegetable growing is limited by domestic food demand, since most vegetables (excluding onions) are grown only for domestic consumption, with limited export to the Pacific. While vegetable growing does need to keep up with population growth, it is not expected to expand at a faster rate, which means there is little risk that enabling vegetable production will lead to a boom in the activity. Restricting production, in contrast, would have serious consequences for nutrition and affordability of food. Currently, Wellington trucks in nearly all of its fresh vegetables from other regions. Allowing horticultural expansion is key to local food security and resilience.

[3] Resource Management (National Environmental Standards for Freshwater) Regulations 2020. Subpart 2—Agricultural intensification: temporary standards. https://www.legislation.govt.nz/regulation/public/2020/0174/latest/LMS364228.html.

[4] Resource Management Act 1991. Clause 32 (b) (ii). https://legislation.govt.nz/act/public/1991/0069/latest/DLM232582.html

Submission on Plan Change 1 to the Natural Resources Plan

Without limiting the generality of the above, HortNZ seeks the following decisions on PC1 to the Natural Resources Plan, 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
Policy WH.P22 Capping, minimising and reducing diffuse discharges of nitrogen from farming activities	Oppose in part	The method of capping nitrogen discharges from individual properties is not supported. A more effective approach to managing freshwater contaminants that recognises community values is to look at water quality at the FMU or sub-catchment scale. Once the worst contaminants are identified, load reduction requirements for those contaminants should be distributed across activities based on community values, prioritising the second hierarchy of Te Mana o te Wai (health needs of people, including drinking water and fresh fruits and vegetables), and reducing regional greenhouse gas emissions. Then, the framework should have a method to measure how people are meeting their load reduction requirements and how that is contributing to sub-catchment or FMU scale issues. Capping discharges on every property is not a targeted approach and may adversely affect activities of great importance to the local community. It should also be recognised that nitrogen risk assessment tools that work for pastoral farming may not be appropriate for horticulture.	Amend Policy WH.P22: ~~Capping,~~ minimising and reducing diffuse discharges of nitrogen from farming activities Diffuse nitrogen discharges from large rural properties and from smaller rural properties that are intensively farmed, are ~~capped,~~ minimised and, on large properties ~~and horticultural properties~~, reduced where necessary by ensuring that…

		It is also unclear what is meant by "intensively farmed". Fruit and vegetable growing are not intensive farming practices. The Council needs to provide scientific evidence to justify what they are considering "intensive farming". Recognition of good management practices is supported.	
Policy WH.P25 Managing rural land use change	Oppose	Land use change should be enabled to allow for economic diversification and transition to low emissions land uses. Mixed farming systems can reduce regional emissions and support improved freshwater outcomes. Fruit and vegetable growers are able to manage their freshwater effects through freshwater farm plans and good/best management practices. This policy would prevent crop rotation, which is an essential horticultural management practice for soil health and reducing disease pressure. Crop rotations often include a pasture window, which means that the same site of land will change from pastoral use to vegetables and back again. A new policy is needed to enable crop rotation. 4ha is also far too small a parcel to trigger controlled land use change. Even freshwater farm plan rules start at 5ha for horticulture and 20ha for other farming systems.	Delete Policy WH.P25. Introduce a new Policy WH.PX for Crop Rotation **Manage commercial vegetable production, including the flexibility to undertake crop rotations on multiple and/or changing properties with a Farm Environment Plan.**
Rule WH.R27 Farming activities on 20 hectares or more of land – permitted activity	Support	HortNZ supports a permitted activity status for horticulture with a requirement for a farm environment plan for activities over 5 ha.	Retain as notified.
Rule WH.R31 Change of rural land use – discretionary activity	Oppose	This rule as notified would make crop rotation impossible, which is an essential horticultural management practice for soil health and reducing disease pressure. Crop rotations	Delete WH.R31.

		often include a pasture window, which means that the same site of land will change from pastoral use to vegetables and back again. There may also be circumstances when it is appropriate to change rural land use from low intensity horticulture (orcharding) to other horticultural use (vegetable growing). For instance, after orchards were destroyed during Cyclone Gabrielle, growers should have been able to grow vegetables for stopgap income while they rebuilt. A permitted activity status for a change from horticulture to horticulture and for crop rotation is more appropriate. A change of pastoral land use to vegetable growing is also a positive outcome for reducing regional greenhouse gas emissions and should be enabled to achieve regional emissions targets. Making it more difficult to grow vegetables would also be an adverse outcome for regional food security. Currently, Wellington trucks in nearly all of its fresh vegetables from other regions. Allowing horticultural expansion is key to local food security and resilience.	
Policy P.P21 Capping, minimising and reducing diffuse discharges of nitrogen from farming activities	Oppose in part	The method of capping nitrogen discharges from individual properties is not supported. A more effective approach to managing freshwater contaminants that recognises community values is to look at water quality at the FMU or sub-catchment scale. Once the worst contaminants are identified, load reduction requirements for those contaminants should be distributed across activities based on community values, prioritising the second hierarchy of Te Mana o te Wai (health needs of people, including drinking water and fresh fruits and vegetables), and reducing regional greenhouse gas emissions. Then, the framework should have	Amend Policy P.P21: ~~Capping,~~ minimising and reducing diffuse discharges of nitrogen from farming activities Diffuse nitrogen discharges from large rural properties and from smaller rural properties that are intensively farmed, are ~~capped,~~ minimised and, on large properties ~~and horticultural properties~~, reduced

		a method to measure how people are meeting their load reduction requirements and how that is contributing to sub-catchment or FMU scale issues. Capping discharges on every property is not a targeted approach and may adversely affect activities of great importance to the local community. It should also be recognised that nitrogen risk assessment tools that work for pastoral farming may not be appropriate for horticulture. It is also unclear what is meant by "intensively farmed". Fruit and vegetable growing are not intensive farming practices. Recognition of good management practices is supported.	where necessary by ensuring that…
Policy P.P24 Managing rural land use change	Oppose	Land use change should be enabled to allow for economic diversification and transition to low emissions land uses. Mixed farming systems can reduce regional emissions and support improved freshwater outcomes. Fruit and vegetable growers are able to manage their freshwater effects through freshwater farm plans and good/best management practices. This policy would prevent crop rotation, which is an essential horticultural management practice for soil health and reducing disease pressure. Crop rotations often include a pasture window, which means that the same site of land will change from pastoral use to vegetables and back again. A new policy is needed to enable crop rotation. 4ha is also far too small a parcel to trigger controlled land use change. Even freshwater farm plan rules start at 5ha for horticulture and 20ha for other farming systems.	Delete Policy P.P24. Introduce a new Policy P.PX for Crop Rotation **Manage commercial vegetable production, including the flexibility to undertake crop rotations on multiple and/or changing properties with a Farm Environment Plan.**

Rule P.R26 Farming activities on 20 hectares or more of land – permitted activity	Support	HortNZ supports a permitted activity status for horticulture with a requirement for a farm environment plan for activities over 5 ha.	Retain as notified.
Rule P.R28 Change of rural land use – discretionary activity	Oppose	This rule as notified would make crop rotation impossible, which is an essential horticultural management practice for soil health and reducing disease pressure. Crop rotations often include a pasture window, which means that the same site of land will change from pastoral use to vegetables and back again. There may also be circumstances when it is appropriate to change rural land use from low intensity horticulture (orcharding) to other horticultural use (vegetable growing). For instance, after orchards were destroyed during Cyclone Gabrielle, growers should have been able to grow vegetables for stopgap income while they rebuilt. A permitted activity status for a change from horticulture to horticulture and for crop rotation is more appropriate. A change of pastoral land use to vegetable growing is also a positive outcome for reducing regional greenhouse gas emissions and should be enabled to achieve regional emissions targets. Making it more difficult to grow vegetables would also be an adverse outcome for regional food security. Currently, Wellington trucks in nearly all of its fresh vegetables from other regions. Allowing horticultural expansion is key to local food security and resilience.	Delete P.R28.
Rule P.R31 Take and use of water – restricted discretionary activity	Support in part.	HortNZ supports the efficient use of water as a matter of discretion. Greater efficiency should be incentivised with greater reliability of water supply.	Retain Matter for discretion 1. The reasonable and efficient use of water, including the criteria in Schedule P (efficient use).

		HortNZ would also support equity and environmental sustainability as matters of discretion for allocation, as is required under Clause 156 of the Natural and Built Environment Act.	Amend to include matters of discretion for environmental sustainability and equity.