

Proposed Plan Changes 85 A-D to Whangarei District Plan

To Whangarei District Council

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EVIDENCE 32
TOPIC R85A-D, 86A-B, 87, 103, 114
SUB# Rural Plan Changes
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Whangarei Growers Market Association Ltd appreciates the opportunity to be heard by this commission.

- 1) Whangarei Growers Market has brought good things to Whangarei. We are the first of its kind in New Zealand and have brought much favourable national and international publicity to the area.
- 2) Our stallholders are all genuine growers who are there to sell their produce.
- 3) They come with fresh produce every Saturday morning no matter what the weather.
- 4) Our core customers are families getting their weekly fresh produce at reasonable and generally consistent prices.
- 5) Whangarei Growers Market Association Ltd SUPPORTS Whangarei District Council's intent to reduce or avoid 'reverse sensitivity' and the fragmentation of productive rural land.
- 6) Whangarei Growers market also supports (Rural Village Environment RVE 1.2.1 _ "Development pressures must be managed in areas that are susceptible to natural hazards *or that comprise high class versatile soils.*"
- 7) **WGM supports the ;submissions of Horticulture New Zea;land**
- 8) However we also have concerns peculiar to our market. We are a dedicated produce market, which many international visitors tell us is becoming rare in parts of the world where they once thrived. Fortunately the market started while Northland still contained enough medium sized produce growers to make a viable market.
- 9) Without our core group of growers who are able to bring large volumes of produce to the market , there would be no effective produce market. These growers must be able to operate their businesses effectively and economically.

10) The market's field crop growers provide a large volume of crops, in particular cabbage, cauliflower, broccoli, carrots, kumara and onions to the market. It is essential to the viability of the market that any plan change does not reduce or curtail these growers' ability to produce.

11) We are concerned for the effect of zoning changes on potential future growers which the market needs to survive.

12) We agree that the land along O'Carroll Road and Crawford Road remain in the Rural Production Environment (Hearing report s24A Part 6 Paras 409-412)

13) We have serious concerns around potential for reverse sensitivity where a Rural Village Environment and/or Rural Living Environments interface with a rural production environment.

14) Rural villages in the Whangarei District have developed on the easy contoured and versatile soils which (Rural Village Environment RVE 1.2.1 _ "Development pressures must be managed in areas that are susceptible to natural hazards *or that comprise high class versatile soils.*" is intended to protect. Soils suitable for commercial crop production are not abundant in the Whangarei district.

15) There are market garden cultivations and orchards near these villages, especially Maungakamea.

16) Our suppliers of produce which must be grown in ground are mostly around Maungakamea, Maungatapere, and Apotu Road. Our orchardists are also well represented in these areas, as well as Glenbervie, Poroti and Maunu.

17) Hydroponics producers such as myself can grow anywhere we can find flat land and good quality water, and don't need huge quantities of either resource. My own property is just one hectare. But many varieties of fruits and vegetables must be grown in ground. We are also concerned that there is land available for new growers to develop and join the market in future.

18) An orchardist cannot move his trees to a new zone, and arable growers need suitably contoured land and suitable soils. These tend to be found around the rural villages such as Maungakamea and Maungatapere. The quality soils and available water are likely the reasons these villages were originally settled. Many of the 'small blocks' in these areas were originally subdivided for horticultural production.

19) We have similar concerns for growers who find themselves zoned into rural living environments. Zoning existing operational horticultural properties into "Rural Living" will increase reverse sensitivity problems in these areas, as housing intensifies. Some of these properties have taken years of work and capital to develop and it is only human nature that growers will try to defend their livelihood.

20) The reporting officer has suggested that the 'existing use' provisions of the Resource Management Act is sufficient protection for existing growers.

21) In practice, this provision of the RMA is impractical for most growers. It is not fit for this purpose.

22) The Environment court has set a very high bar when considering 'existing use.' The records required by the courts in order to show existing use may not still be in existence. This applies to both council and privately held records.

23) The expense of proving 'existing use' to the satisfaction of the environment court puts it out of financial reach for medium and small growers.

24) The requirement of RMA Act 10 1 (a) (ii) regarding character, intensity and scale does not allow for economically driven changes in land use which have occurred over time. The nature of crop growing is that growers must have the flexibility to respond to economic and environmental drivers. That is the nature of good husbandry. For instance, soil management may require land be rested by putting it back into grass and running livestock for a time, perhaps for years. Some growers solve this problem by leasing crop land on suitable soils from otherwise pastoral farmers.

25) The protection of the districts economic base is at least as important as amenity protection.

26) We believe Whangarei District Council should actively avoid damaging local horticulture in favour of residential development. We believe we have sound economic reasons for this. Auckland continues to lose its horticultural land to housing. Further south, Regional Councils' nitrogen rules will probably prevent land use changes, including the conversion of dairy pasture to vegetable growing. Logically further economic opportunities for Northland vegetable food production will open.

27) Northland enjoys warmer winters than further south and can grow earlier and later than horticulturalists south of Auckland. Whangarei is close to New Zealand's largest consumer base, the Auckland area.

28) Horticulture is a major contributor to job growth in Whangarei and the wider Northland area. The 2013 “Social and Economic Impact of Whangarei Growers Market” report considered the market may generate employment for up to 90 persons. This sector has seen considerable expansion since 2013.

**Requested action for PC85C Rural Village Environment
and 8) Plan Changes 85A-D and Plan Change 86B Rural Living
Environments**

29) Therefore we ask that where rural living or village living subdivisions occur adjacent to existing horticultural operations, or where living environments interface with rural production environments the new plan places the onus for mitigating reverse sensitivities on developers.

30) Require setbacks of residential units from existing horticultural operations on a separate site as a means of limiting reverse sensitivity in rural living zones.

31) Require that new residential units adjoining existing horticultural operations should be double glazed and built of noise reducing materials.

32) There are concerns that Rural Living Environments have been imposed over operational orchards and covered crop operations. Growers need freedom to use machinery, sprays and fertilisers at the times appropriate to the operations. Whangarei Growers Market requests that where practicable rural living environments should not be imposed over existing horticultural operations.

Proposed Definitions PC 85 A-D, PC 86 and PC 87. (Evaluation Report Part 1 appendix 1) (rural plan changes “proposed meaning of words:”)PC85-A-D, PC86 and PC 87.

33) The market’s growers include orchardists, arable growers, hydroponics, flower growers and nurserymen. It is essential to the ongoing viability of the market that our growers do not have undue compliance costs imposed on their businesses.

32) Therefore we ask that care be taken with the definition of permitted activities. There is concern that structures which are essential to many horticultural operations could in future be conflated with ‘buildings.’

33) Crop protection, support or artificial shelter structures including greenhouses should remain defined as currently in ‘definitions’ proposed through PC85-A _ D, PC86 and PC 87.

34) Make it clear that crop protection structures, crop support structures, crop coverings such as greenhouses, tunnel houses and cloches and artificial crop/ orchard shelters are excluded from the definition of ‘buildings.’

34) Cultivation for horticultural purposes -eg preparing for field crops, removing and replanting orchard trees and/or shelter belts, ripping of shelter belt roots etc should be included in the “definition of farming” proposed through PC85-A _ D, PC86 and PC 87.

35)_ Amend Proposed Definitions Appendix 1 PC85-A _ D, PC86 and PC 87. Farming (b) to “Horticulture, including hydroponics, and covered cropping as in greenhouses.”

Whangarei Growers Market Association Ltd supports the submission of Federated Farmers of New Zealand (Submission #0253) regarding the storage of fertilisers, fuels and agrichemicals.

We ask that council rules for activities such as storage of fuels, fertilisers, sprays and agrochemicals be kept in line with already existing government legislation such as the Hazardous Substances and New Organisms Act, Worksafe and the Transport Act.

b)We have concerns that normal storage and use of essential horticultural supplies are not caught up with regulations designed for large industrial sites.

c) Like other primary producers, horticultural operations may have minitanks for diesel and/or petrol storage for use in agricultural machinery. Small scale stores of agrochemicals and fertilisers are a normal part of horticultural operations.

d) The regulations for storage, transport and use of these items is already covered by the Hazardous Substances and New Organisms Act, Worksafe and the Transport Act.

16) Requested Action

a) We therefore ask that RA.2.3.1(a) and/or Appendix 8 be amended to make it clear that agricultural horticultural or forestry use and/or storage of fuel, fertiliser and agrichemicals have permitted status within the Rural Area. Amendments should ensure that the rules align with already existing government legislation such as the Hazardous Substances and New Organisms Act, Worksafe and the Transport Act.

b) We support Rural Area.2.3.1(d)(ii)(a) which exempts storage or stockpiles that are ‘accessory to agricultural, horticultural or forestry activities.’

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