

**BEFORE THE COMMISSIONERS  
IN WHANGAREI DISTRICT**

**IN THE MATTER** of the Resource Management Act 1991 (“**the Act**”)

**AND**

**IN THE MATTER** of the Whangarei District Council Proposed Plan Changes –  
Urban and Services (82 A & B, 88 A-J, 109, 115, 136, 143,  
144, 145, 147 & 148)

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**STATEMENT OF JORDYN LANDERS FOR HORTICULTURE NEW  
ZEALAND**

**7 NOVEMBER 2019**

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## **INTRODUCTION**

### **Qualifications and experience**

1. My name is Jordyn Maree Landers. I am an Environmental Policy Advisor at Horticulture New Zealand (HortNZ). In this role I am involved with national policy and regional and district planning processes in regions where fruit and vegetables are grown commercially. I have been in this role since August 2019.
2. I hold a Master of Planning from the University of Otago. I am an intermediate member of the New Zealand Planning Institute (NZPI). I have three years planning experience. I was previously employed as an Environmental Planner at GHD. In this role I was involved with preparing and assessing resource consent applications and assisting with plan change processes.
3. This evidence has been prepared on behalf of HortNZ. I will not be attending the hearing in person, I request that the Hearings Panel accept this evidence as tabled.

### **Purpose and scope of evidence**

4. This evidence addresses the further submissions made by HortNZ on submissions considered in the hearings on the Urban and Services District Plan Changes on the Whangarei District Plan (WDP); specifically, those on PC148 – Strategic Direction and Subdivision.

### **BACKGROUND TO HORTICULTURE NEW ZEALAND**

5. HortNZ was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers' and New Zealand Fruitgrowers' and New Zealand Berryfruit Growers Federations.
6. The vision of HortNZ is 'Healthy food for all forever.' The vision is supported through the Mission statement: 'Creating an enduring environment where growers prosper.' HortNZ's involvement in resource management planning processes is part of achieving these outcomes.
7. On behalf of all active growers HortNZ takes a detailed involvement in resource management planning processes as part of its national environmental policy. HortNZ works to raise growers' awareness of the RMA to ensure effective grower involvement under the Act, whether in the planning process or through resource

consent applications. The principles that HortNZ considers in assessing the implementation of the Resource Management Act 1991 (RMA) include:

- (a) The effects based purpose of the Act;
  - (b) Non-regulatory methods should be employed by councils;
  - (c) Regulation should impact fairly on the whole community, make sense in practice, and be developed in full consultation with those affected by it;
  - (d) Early consultation of land users in plan preparation;
  - (e) Ensuring that RMA plans work in the growers interests both in an environmental and economic production sense.
8. HortNZ manages issues that cover and affect the whole horticulture industry (excluding winegrowers and winemakers). Many of the issues are common between plans, so HortNZ provides input to policy at the national level, as well as regional and district policy processes.
  9. Nationally the sector represents 5,000 growers producing around 110 crops (focused on producing food for people). Approximately, \$3.6 billion is generated in export revenue annually and \$2.24 billion in domestic revenue (both excluding viticulture). Over 60,000 people are employed in the industry<sup>1</sup>.
  10. The industry body is committed to continuous environmental improvement, and has spent significant resource on a good management practice program for growers, covering issues of significance to markets and councils, known as NZGAP.
  11. HortNZ is the umbrella organisation for 22 separate product groups covering 110 crops that are outlined in the Commodity Levies (Vegetables and Fruit) Order 2007. Product groups are also levy collecting organisations working on sector specific matters in collaboration with HortNZ.

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<sup>1</sup> HortNZ, Annual Report 2019 (<http://www.hortnz.co.nz/assets/Annual-Report/HortNZ.AR.19.FinalART.1LR.pdf>)

## **HORTICULTURE IN THE WHANGAREI DISTRICT**

12. There is more than 4,400ha of horticultural activity within the Northland region, approximately 1500 hectares of which is within the Whangarei District<sup>2</sup>. The main crops is avocados, however other crops including kiwifruit, tamarillos, leafy green vegetables, citrus fruit, onions, berries and passionfruit, are also grown.
13. Horticultural plantings are located in key areas where the components necessary for a production system are available. These include suitable soils, access to water, suitable climate and infrastructure to support the production. These areas include Glenbervie – Kirapaka, Maungatapere, Maungakaramea, and Apotu Rd Kauri areas. It is important to ensure that these areas and others where horticultural capacity for food production exists are retained in rural production so that these resources can be utilised.
14. Some of the main constraints for horticulture in the district are linked to the potential for reverse sensitivity with non-rural neighbours complaining about the activities being undertaken on adjacent blocks.

## **HORTNZ FURTHER SUBMISSIONS AND OUTCOMES SOUGHT**

15. While HortNZ generally support the direction of the WDP, the further submissions which are discussed below reinforce the view that horticultural activity needs to be enabled (and protected from incompatible activities) and soil (a finite resource) an important determinant of highly productive land protected for future generations.
16. In summary, HortNZ is interested in seeing clear and robust policy which:
  - a) Provides a framework that directs growth in a considered and co-ordinated way.
  - b) Provides a policy framework that recognises the characteristics of each zone, and provides for rural production activities.
  - c) Avoids incompatible activities locating within the vicinity of horticultural operations which are appropriately located within the Rural Areas.
  - d) Has a clear and explicit framework within the plan with regard to the potential for reverse sensitive effects at the rural/urban interface.

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<sup>2</sup> <https://whangareinz.com/business/key-industry-sectors/agriculture-horticulture-forestry>,  
<https://www.freshfacts.co.nz/files/freshfacts-2018.pdf>

## **Strategic direction objectives and policies**

### Objective SD-03

17. HortNZ made a further submission supporting in part a submission by Housing New Zealand Corporation (268.5) to provide for intensification and specifying the existing suburban zones where growth is appropriate. HortNZ also supported a submission by Northpower (127.1) who sought to retain the objective. The s41A report recommends retention of the objective with no changes.
18. HortNZ wishes to reinforce the importance of retaining this objective and supports the findings of the s42A report that this objective is important as part of the policy framework to avoid further fragmentation of productive rural land.

### Objective SD-05

19. HortNZ made a further submission supporting in part a submission by New Zealand Defence Force (156.1) seeking to retain the objective. The s42A report recommends adding 'remedy or mitigate' to the objective and diluting the 'avoidance' outcome sought by the objective. HortNZ oppose this addition as the principle of avoidance (of reverse sensitivity) should be explicit in the policy framework, when considering incompatible land uses.
20. HortNZ consider that retaining the objective wording as notified would give effect to Policy 5.1.1(e) of the RPS which reads "*Should not result in incompatible land uses in close proximity and avoids the potential for reverse sensitivity*".
21. HortNZ further submitted in support of Fonterra Limited's (202.2) submission to rename the objective 'Reverse Sensitivity'; the s42A report recommends that this submission be accepted and HortNZ support this recommendation.

### Objectives SD-O14 and SD-O16

22. HortNZ further submitted on Northland Regional Council's submission (264.5) to retain SD-O14 and SD-O16 as notified. The s42A recommends the objective be retained as notified; we support this recommendation as these objectives are important for protecting rural productive capacity.

### Objective SD-O15

23. HortNZ further submitted in support of a submission by Radio New Zealand (243.4) to include reference to land uses that are not incompatible with existing uses, remove the reference to residential and provide for network utility operator infrastructure in

Objective SD-O15. The s42A report recommends that the objective is retained as notified.

24. The s32 report states that this objective sets out the rationale for the rural zones. The objective seeks to allow a range of 'appropriate' land uses in appropriate areas (within the Rural Area). HortNZ support further definition within the objective of what constitutes 'appropriate'. This can be achieved through inclusion of reference to incompatible activities, which would be consistent with the terminology of other objectives and policies. We seek that Radio New Zealand's submission be accepted to the extent that incompatible activities are not considered an appropriate activity.

#### Policy SD-P2

25. As above, HortNZ further submitted in support of Fonterra Limited's (202.3) submission to rename the policy 'Reverse Sensitivity'; the s42A report recommends that this submission be accepted and HortNZ support this recommendation.
26. HortNZ also made a further submission in support of Northland Regional Council's submission (264.8) to amend SD-P2 to provide more specific direction on how this will be achieved. HortNZ seek that this submission be accepted as we consider that the plan would be improved with a clear framework for managing reverse sensitive effects at the rural/urban interface.
27. The s42A report recommends that 'and expansion of existing activities' is added to the policy as an activity to be managed to avoid conflicts between incompatible uses. HortNZ supports a policy that manages the potential reverse sensitivity effects of both new and expanding activities incompatible activities on, for example, horticulture in Rural Areas.

#### Policy SD-O6

28. HortNZ further submitted opposing in part Refining NZ's (260.4) submission to change the word urban to residential and include a reference to industrial zones within the policy. The section 42A report recommends that this submission is accepted in part, but limited to the Heavy Industrial Zone.
29. HortNZ support the intent of the policy, however we seek to retain the terminology 'urban'. The term 'residential' only captures one aspect of urban development, which can also include, with reference to the RPS, '*development intended for mixed-use, commercial, industrial activities and all development where the primary purpose is residential use, except where it is ancillary to a lawfully established rural activity*'.

30. We consider that the term 'urban' better reflects the intent of the policy, as the corresponding objective (SD-03) seeks to '... avoid urban development sprawling into productive rural areas'.

#### Policy SD-P11

31. HortNZ made a further submission on Housing New Zealand Corporation's submission (268.19) to retain as notified, Policy SD-P11. This submission is accepted in the s42A report. We support the retention of this objectives however note that the name of the heading would be more appropriately named 'Urban Residential Activities', as it is not only residential uses which can reduce the potential for soil-based rural production activities.

#### Policy SD-P39

32. HortNZ made a further submission on Fonterra Limited's submission (202.8) to retain SD-P39 as notified; the s42A report recommends that this submission be accepted. We support this recommendation as this is an important policy for maintaining rural productive activities associated with highly versatile soils.

### **Subdivision Objectives and Policies**

#### SUB-O2

33. HortNZ further submitted on Housing New Zealand's submission (268.4), supporting in part their submission to include maintenance, in addition to protection or enhancement of the matters listed in the objective. HortNZ accept the s42A recommendation to retain the objective as notified. With regard to highly versatile soils, HortNZ support the protection of this finite resource (particularly in regard to considering the effects of subdivision).

#### SUB-O3

34. HortNZ made a further submission supporting in part the submissions of Gary Dow (70.9) and Population Health Unit of the Northland District Health Board (207.82) who sought to amend the reference in the policy to the changing needs of people and consideration of future generations, and in a sustainable manner provide for current and future needs, respectively.
35. HortNZ support the changes recommended in the s42A report, as providing for future generations is an important consideration (particularly with regard to highly productive land and food security). However, I acknowledge that in some cases the best

outcome to provide for future generations is to not subdivide, which may in some cases make this objective redundant.

#### Policy SUB-P1

36. HortNZ further submitted on Northland Regional Council's submissions on SUB-P1 (264.16 and 264.17) to provide for highly versatile soils and consideration of reverse sensitivity to the policy. The s42A recommends that SUB-P1 is retained as notified.
37. HortNZ consider that including these two important aspects, protection of highly versatile soils and reverse sensitivity, be considered in the subdivision policies to provide a cohesive and comprehensive policy framework. We seek that Northland Regional Council's submissions be accepted.

#### Policy SUB-P2

38. HortNZ made a further submission opposing a submission by Morgan (229.21) to amend (a) to delete (c). We agree with the recommended changes within the section 42A report, to clarify the wording of (a) (now (1)), and retain (c) (now (3)); however the interpretation of the policy would be made clearer by the addition of 'or' or 'and' between each qualifier.

**Jordyn Landers**

7 November 2019