SUBMISSION ON

Proposed Change 1 to the Regional Policy Statement or for the Wellington Region

14 October 2022

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

1. **Part 1:** HortNZ's Role
2. **Part 2:** Submission

Our submission

Horticulture New Zealand (HortNZ) thanks Greater Wellington Regional Council (GWRC) for the opportunity to submit on Proposed Change 1 to the Regional Policy Statement (RPS) and welcomes any opportunity to continue to work with GWRC and to discuss our submission.

HortNZ wish to be heard in support of this submission at a hearing and would consider presenting a joint case at the hearing with others who make a similar submission.

HortNZ could not gain an advantage in trade competition through this submission.

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

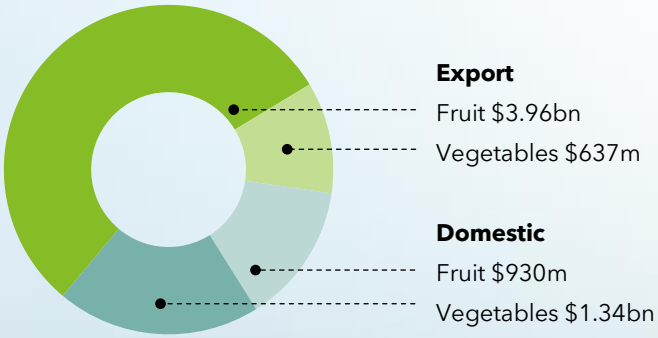
HortNZ represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruit and vegetables. The horticultural sector provides over 40,000 jobs.

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.



Industry value $6.87bn
Total exports $4.6bn
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

1.1. Current extent of horticulture

Freshfacts reports that in the Wellington region there are 154+ ha of vegetables, a small area of indoor crops and 1,261 ha of fruit (noting that this includes 832 ha of wine grapes and 181 ha olives, crops which HortNZ does not represent).[1]

Within the region, the majority of growing in the region is located in the Wairarapa and Otaki.

- In the Wairarapa: predominately apples and pears, small areas of other fruit trees, and outdoor vegetables. There is also vegetable seed growing in the Wairarapa. The growing of pea plants and pea straw in the Wairarapa were banned following discovery of pea weevils in 2016/17; this ban was lifted in February 2020.
- In Otaki: predominately outdoor vegetables and indoor crops.

There is very little growing occurring in the Porirua City, Upper Hutt City, Lower Hutt City and Wellington City areas.

1.2. History of horticulture in the region

There is a history of market gardening in Wellington City and Lower Hutt (until the late 1940s, the Hutt Valley was known as the 'market garden of Wellington'), however growing was pushed out to the surrounding areas, including Otaki and the Wairarapa, as urban development occurred.[2]

Otaki growing area was a significant area for outdoor tomato growing, until indoor growing become more prominent. There remains some vegetable growing in the area, however generally the land parcels that were economically viable for growing tomatoes on, are too small and valuable to support greens growing.

There is also a history of market gardening in the Wairarapa, as well as fruit growing (particularly pipfruit). The alluvial plains around Greytown traditionally supported a variety of horticultural crops – including vegetables, berries, apples and pears. [3]

1.3. Potential for horticultural land use in Wellington

[1] https://www.freshfacts.co.nz/files/freshfacts-2021.pdf
[2] Lee, Lily and Lam, Ruth (2012). Sons of the Soil, Chinese Market Gardeners in New Zealand.
[3] Masterton District Library and Archive: *Apple Growing*, available at https://library.mstn.govt.nz/wairarapa-stories/farming/apple-growing/.

Within the region, Land Use Class (LUC) 1-3 soils – which are generally the most suitable for horticulture – are concentrated around the plains of the Wairarapa and Otaki.[4] This has been identified in the Wellington Regional Growth Framework.

With the predicted effects of climate change, there is a suggestion in the Wairarapa Food Story report that the climate in the Wairarapa may mirror the Hawkes Bay (a predominant horticultural area) by 2040.[5] This same report highlighted that a '*shared belief was that the Wairarapa could be the food bowl for Wellington*'.

Work undertaken associated with the proposed Wakamoekau Community Water Storage Scheme – including the 'Near-term Opportunities for Value' report[6] - identified opportunities for potential agricultural land use opportunities that could be enabled or enhanced through supply of reliable water, including:

- Local fresh (vegetables and berry fruit) and peas, which are identified as 'value capture opportunities'.
- Pipfruit, summerfruit, and vegetables for export, which are also identified as 'value creation opportunities', but that are conditional on investment in infrastructure (such as post-harvesting facilities etc.) or suitable markets in the case of vegetables for export.

While ultimately external factors, such as the market and availability of water, will determine if/how much growth in horticulture occurs in the Wairarapa, there is the potential for growth.

2. Key themes and outcomes sought by HortNZ

The RPS sets out regionally significant issues and objectives for the management of the region's natural and physical resources and the policies and associated methods to achieve the objectives. Key resource management issues identified by HortNZ are set out below.

In respect to resource management, the following strategic direction is sought by HortNZ in the RPS in relation to the key focus areas including climate change (and natural hazards), urban development and freshwater:

- Food security and the values of food production are recognised and provided for within the RPS.
- Recognition of the value of highly productive land for food production – for current and future generations.
- Protection of the highly productive land resource from inappropriate subdivision, use and development.
- Enablement of the use of highly productive land for food production.

[4] https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Capability/lri_luc_main/421,406,404
[5] Wairarapa Food Story Group: Wairarapa Food Story, available at https://wairarapafoodstory.nz/wp-content/uploads/2018/09/Food%20Story%20LR.pdf .
[6] Leftfeild Innovation Limited (2020). Near-term Opportunities for Value.

- Ensuring there are not barriers to climate change adaptation and/or mitigation
- Enabling long-term climate change adaptation and/or mitigation, through projects such as water storage and provisions which enable growing areas to move between water catchments, zones, districts and regions (i.e land use change).

2.1. Food production and food security

Food security is a nationally important issue which needs to be addressed at all meaningful levels.

While New Zealand is a net food exporter, many of the vegetables and some of the fruit that we grow are only for domestic food supply. It is also noted:

- Over 80 percent of vegetables grown in New Zealand are for domestic consumption.[7] For most vegetable crops, the domestic market is the primary market, but many growers produce export crops within their rotations for practical (soil health) and economic reasons. New Zealand also plays a role in exporting fresh vegetables to the Pacific Islands.
- Some fruit crops grown in New Zealand have a predominately export focus – for example it has been estimated by NZIER that 95% of kiwifruit and 83% of apples are exported.[8] These crops also supply the local market and some fruit cops are grown predominately for domestic supply.

New Zealand has a national food producing system that relies on growing vegetables and fruit in pockets of highly productive land, with good climate and access to freshwater. A sustainable, year-round supply of produce for New Zealand is only possible if the different growing regions work in conjunction to ensure that seasonality and other variables, such as diseases and weather, do not interrupt that supply.

2.1.1. FOOD INSECURITY AND HEALTH LOSS

Fruit and vegetables are essential for the human health of New Zealanders. Many New Zealanders live with food insecurity.

A 2019 Ministry of Health study analysed household food insecurity among children in New Zealand, it estimated that 174,000 (19%) of all children in New Zealand live in food-insecure households.[9] There is an extensive body of research indicating that children experiencing household food insecurity have lower fruit and vegetable intake, diets higher in fat, and are at an increased risk of obesity.

In New Zealand, for families living in deprived areas, increases in fruit and vegetable prices, especially around their off-season, compel them to substitute

[7]

[8] NZIER, 2019. Farm share of retail prices. Analysis of domestic farmer margins in a globalised world.
[9] Ministry of Health. (2019). Household food insecurity among children, New Zealand Health Survey.

the purchase of healthier whole fruit and vegetables with cheap energy-dense and nutrient-poor products.[10]

Otago University has modelled the potential health impacts of increased vegetable prices (as a result of regulatory pressure preventing expansion to keep up with population growth) and found that an increase in vegetable prices of 43 - 58 percent (based on Deloitte, 2018) would result in a loss of 58,300 – 72,800 Quality Adjusted Life Years and health costs of $490 -$610 million across the population.[11]

There are complex social and economic reasons that people struggle to meet their nutritional needs – the resource management system is one aspect, as natural resources are required to grow food and reasonable priced fruit and vegetables are essential for food security (and human health). Therefore we strongly consider that GWRC should ensure that vegetable and fruit growing is enabled, i.e., not unnecessarily restricted. The RPS can help achieve this important matter.

2.1.2. FOOD PRODUCTION AND FRESHWATER

The values of food production land depend on fresh water, in particular because:

- There is only 5% of New Zealand that is available for high value horticultural production (versatile soils).
- The value of this finite and precious soil resource is compromised without clean fresh water to cultivate crops/trees, and to wash and prepare produce.
- Food cannot be grown without water and therefore cannot occur without discharges. The values of land and water and interlinked.

It is HortNZ's view that the hierarchy of Te Mana o Te Wai, as set out in the objective of the NPS-FM 2020, provides for:

- Fruit and vegetables for domestic consumption as a second priority – it is necessary for the health needs of people; and
- Fruit and vegetables for local markets and export as a third priority - it enables people and communities to provide for their social, economic, and cultural well-being.

2.1.3. PRESSURES ON FOOD PRODUCTION

New Zealand's existing food production systems are coming under increased pressure from population growth (and competing land use demands reducing availability of highly productive land), climate change, and the need to improve environmental outcomes.

For the Wellington region, this challenge is recognised in the Wellington Regional Growth Framework (WRGF):

[10] Rush, E., Savila, F., Jalili-Moghaddam, S., & Amoah, I. (2018). Vegetables: New Zealand Children Are Not Eating Enough. Front. Nutr

[11] Cleghorn, C. 2020: The health and health system cost impacts of increasing vegetables prices over time, University of Otago

Wairarapa and Horowhenua also contain important areas of highly productive land, where rural values such as soil protection, food production and water quality have to be provided for and balanced against urban development. This will need to be carefully considered into the future.[12]

While the WRGF describes the Horowhenua[13] and Wairarapa as 'food bowls', however the regional does not produce all the food it needs for the population and other growing regions are also coming under increasing pressure.

For this reason, it is important that food security and the values of food production are recognised and provided for within the RPS.

2.2. Protecting the highly productive land resource and enabling it's use for primary production

Highly Productive Land is a scarce, finite resource and intergenerational asset that is under threat in New Zealand. For future generations, it is critical that is highly productive land is protected from the continual trend of cumulative loss and loss of productive capacity, due to reverse sensitivity and competition for natural resources.

Manaaki Whenua – Landcare Research showed that our most highly productive land (defined as LUC classes 1–3 in this study) has been significantly impacted by land fragmentation, nationally the area of highly productive land that was unavailable for agriculture increased by 54 percent between 2022-19.[14]

There is a need to manage this the need to manage this natural resource strategically, as recognised by the promulgation of a draft National Policy Statement for Highly Productive Land in 2019.

"*Access to highly productive land is essential to continue food production for the domestic market and for export…*

Ensuring everyone in New Zealand has access to affordable and nutritious food into the future is an important consideration in how we choose to use land today"[15]

A specific challenge is that highly productive land (and horticulture) is often peri-urban in location[16], which can make it more vulnerable due to conflict with urban development objectives. An effect of urban development can be the loss of versatile soils for food production.

HortNZ recognise that in some circumstances there needs to be flexibility to develop highly productive land. What is important in our view, is that urban development and productive land are considered together to provide a planned approach so new urban areas are designed in a manner that maintains the overall productive capacity of highly productive land.

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[12] https://wrgf.co.nz/wp-content/uploads/2021/08/1320-Wellington-Regional-Growth-Framework-Report-JULY-2021-FINAL-LR.pdf

[13] Noting that the scope of this work extended beyond the regional boundaries.

[14] https://www.landcareresearch.co.nz/publications/soil-horizons/soil-horizons-articles/monitoring-change-in-the-availability-of-new-zealands-highly-productive-land-resource/

[15] https://environment.govt.nz/assets/Publications/our-land-2021.pdf (Quoted from page19 and page 20.)

[16] https://environment.govt.nz/assets/Publications/land-fragmentation-report.pdf

Highly productive land, in HortNZ's view, includes factors additional to LUC class including key natural and physical resources that contribute to the land's productivity.

The Section 32 report notes national direction, or draft national direction for indigenous biodiversity and climate change; but fails to mention that a National Policy Statement for Highly Productive Land was consulted on in 2019 (and as of 17 September has been gazetted.

2.3. Climate change – adaptation, mitigation and transition to a low emissions economy

Highly productive land is a natural resource that will need to be carefully managed with a changing climate so this land can continue to meet the reasonably foreseeable needs of future generations. With a changing climate we can expect the following impacts:

- Increased risk of flooding due to severe weather events threatening the viability of some HPL for horticulture.
- Natural hazards pose a risk to food production and events can disrupt food supply
- An increased prevalence of drought is likely to impact water availability. Increasing drought conditions may also reduce the capacity of receiving environments to assimilate abstractions to support fruit and vegetable production
- A reduction in cold conditions may allow for expansion of warmer climate crops)

2.3.1. WATER STORAGE

In the face of climate change, water storage infrastructure is essential as part of New Zealand's adaptation response.

Warmer drier climates that are more prone to extremes poses significant challenges in terms of water availability for the food and fibre sector and rural communities (as well as urban communities). Water storage is a key climate change adaptation option. There could also be a role for water storage in providing benefits for flood management/flood attenuation. HortNZ is mindful of the need for water storage development to be consistent with Te Mana o Te Wai principles and hierarchy of obligations.

2.3.2. LAND USE CHANGE AS PART OF A TRANSITION TO A LOW EMISSION ECONOMY

Diversification to horticulture presents an opportunity to reduce emissions while increasing food production, as identified by the Climate Change Commission.

The Climate Change Commission's advice[17] to Government assumed (in the demonstration path) converted of 2,000 ha of land per year to horticulture from 2025, but noted that this could increase if "if barriers – such as water availability,

[17]Ināia tonu nei: a low emissions future for Aotearoa.

labour, supply chains and path to market – are addressed." The following was listed as a critical outcome - "Opening up opportunities for more conversion to lower emissions production systems and land uses, including horticulture".

To enable horticulture growth, requires not only investment in the right areas but a regulatory/policy environment that enables the market to respond.

In many cases land use change to horticulture could also result in water quality benefits, for example a reduction is faecal microbial loads, and in most cases reductions in nutrients and sediment. HortNZ seeks that the RPS provides strategic direction that enable land use change, while maintaining (or enhancing) the quality of the environment.

3. HortNZ's understanding of Proposed Change 1

HortNZ's understanding of Proposed Change 1 to the RPS is that it is seeking to implement the National Policy Statement for Urban Development 2020 (NPSUD 2020), parts of the National Policy Statement for Freshwater Management 2020 (NPSFM 2020) as well as to address the issues of climate change, indigenous biodiversity and high natural character.

We note our understanding that long-term visions for freshwater (required to be expressed as RPS objectives) are not addressed by Proposed Change 1 and that these will come through a further change to be notified in 2024.

The Section 32 evaluation report states that Proposed Change 1 is focused on objectives/visions which the NPSFM 2020 directs to be included in the RPS, and that Natural Resources Plan is the primary mechanism for implementing the full NPSFM 2020 and proposed changes will be notified in 2023-24.

Proposed Change 1 does not specifically address the protection of highly productive land; the National Policy Statement for Highly Productive Land 2022 was gazetted in September 2022. While HortNZ appreciates that the preparation and notification of Proposed Change 1 pre-dates this, nevertheless it is considered important that the highly productive land resource is recognised and provided for in the changes that are proposed to the RPS, in recognition that this is a finite resource.

4. Provisions identified as subject to the Freshwater Planning Process

HortNZ understands that PC1 has been promulgated to specifically respond to national direction including the NPS-FM 2020. As freshwater planning processes now follow a different decision-making pathway, not least of which is that the first instance decision can only be appealed on a point of law, it is critical that it is clear what are freshwater provisions and what are not. This was recently explained by the High Court in the context of the Otago RPS.

In the case of PC1 the section 32 does include a very helpful appendix (Appendix C) that sets out what provisions are freshwater and how they link back into the NPS-FM. What would also be helpful is for there to be a more general statement that talks to broader topics within PC1 and explains why these were considered

freshwater whereas other topics were not. An example of topics included with the freshwater planning process are:

- Housing
- Tangata Whenua's involvement in decisions
- Ki Uta ki Tai
- Climate change

The documentation also notes that some things are both freshwater processes and schedule 1, but it is unclear how this is going to work in practice.

While not an amendment to PC1 Hort NZ requests that these matters are clarified in advance of any hearings so it is clear what process is being followed for particular provisions. As noted above, this is important due to the different appeal rights afforded and the ability for integrated planning.

As a related aside as a national body HortNZ submits on planning and policy documents across the country and it is apparent that very different approaches are being taken to what is or is not a freshwater provision. HortNZ considers that this is largely an issue that central government needs to take a lead in and to this end HortNZ notes that it will be taking up this issue with the Ministry for the Environment in the first instance.

Submission on draft Proposed Change 1 to the Regional Policy Statement for the Wellington Region

Without limiting the generality of the above, HortNZ seeks the following decisions on the Proposed Change 1 to the RPS, 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.

Where amendments to the operative RPS are proposed by Change 1 these are shown as tracked changes. HortNZ's relief sought is indicated as follows: additions are indicated by bolded underline, and deletions by bolded strikethrough text.

Provision	Support/ oppose	Reason	Decision sought
Introduction text preceding Objective A – 'overarching resource management issues for the Wellington Region'	Support in part	Highly productive land is a finite resource that is impacted and lost through 'inappropriate and poorly managed use and development' – this reflected in parts of the operative RPS and should be carried through into/reflected in the overarching resource management issues for the Wellington Region.	Amend, *The overarching resource management issues for the Wellington Region are:* *1. Adverse impacts on natural environments and communities* *Inappropriate and poorly managed use and development of the environment, including both urban and rural activities, have damaged and continue to impact the natural environment, increase greenhouse gas emissions, destroying ecosystems, degrading water,* ***result in loss, fragmentation or reverse sensitivity effects on***

			highly productive land, *adversely impacting the relationship between mana whenua and the taiao, and leaving communities and nature increasingly exposed to the impacts of climate change.*
Objective A: Integrated management	Support	Integrated management is a key theme of national direction, such as the NPSFM 2020 and supported by HortNZ.	Retain as notified.
Chapter 3.1A Climate Change			
Chapter Introduction 3.1A Climate Change	Support	The introductory text outlines the context for climate change in the region and key issues relating to climate change. HortNZ support the acknowledgement of the provision of food as an ecosystem service in (2) and in (3) that the risks associated with natural hazards exacerbates by climate change can have impacts on food production and water security; however an amendment is sought to note also food security.	Amend paragraph 3 (the third regionally significant issue) as follows: *3. The risks associated with natural hazards are exacerbated by climate change* *The hazard exposure of our communities, land, infrastructure, food* ***security*** *(including mahinga kai) and water security is increasing because of climate change impacts on a range of natural hazards…*

Objective CC.1	Support	HortNZ support climate change mitigation and adaptation being integral to sustainable air, land, freshwater and coastal management, well-functioning urban environments and rural areas and well-planned infrastructure.	Retain as notified.
Objective CC.3	Support in part	Further clarity could be provided around the analysis supporting the reduction should in the stated timeframes. As sought in this submission, HortNZ seeks that the approach in the RPS is to enable transition (rather than just limiting increases in emissions), as punitive policies are already provided through pricing tools such as the Emissions Trading Scheme.	Retain subject to further clarity, and a policy approach of enabling transition.
Objective CC.4	Support	It is noted that the National Adaptation Plan seeks to prioritise nature-based solutions where possible and to increase their integration into urban form, and support for working with nature to build resilience. HortNZ generally supports this outcome, where it is possible, also while recognising that additional solutions will be needed. The wording in the objective of nature-based solutions being an 'integral part' of climate change mitigation and adaptation, in our view acknowledge they will not be the only part – which is important to acknowledge. For example, water infrastructure will be critical in enabling the horticulture sector to adapt to the changing climate, while reducing impacts on ecosystems and safeguarding the HPL resource for future generations.	Retain as notified

Objective CC.6	Support	Resilience to the effects of climate change is important and should be recognised and enabled.	Retain as notified
Objective CC.7	Support	Partnerships such as He Waka Eke Noa will assist growers to understand their operation in the context of climate change.	Retain as notified
Chapter 3.8 Natural hazards			
Chapter (3.8) introduction	Support in part	As noted in the Section 32 report, 'Shifting and more variable weather patterns threaten food production, and …', consequential to this are impacts on food security.	Amend introduction text, *1. Risks from natural hazards* *Natural hazard events in the Wellington region have an adverse impact on people and communities,* ***food production and food security****, businesses, property and infrastructure.*
Objective 19	Support in part	Natural hazards pose a risk to essential human health needs including food production, as these events can disrupt food supply. Natural hazard events (e.g., frequency of flood, drought) are set to be worsened by climate change.	Amend Objective 19, The risks and consequences to people, communities, **food production and food security,** ~~their~~ business~~es~~, property, ~~and~~ infrastructure and the environment from natural hazards and the effects of climate change ~~effects~~ are ~~reduced~~ minimised.

Objective 20	Support in part	The drafting of this objective could be clearer, i.e. to confirm if the 'minimise' direction applies to both parts of the following sentence. HortNZ support the 'minimise' direction in the objective, as avoidance of any impacts on for example natural processes, will not always be possible. HortNZ does not support the explanation in the 'summary of amendments' table preceding the provisions (while recognising this is not part of the plan change) – which states "*Amendment to add direction that natural hazard mitigation and adaption cannot have adverse environmental effects*".	Consider clarifying the drafting of Objective 20. Retain 'minimise' policy direction in respect of managing the effects that may be associated with natural hazard and climate change mitigation and adaptation activities.
Objective 21	Support in part	HortNZ generally support the objective of strengthening resilience, however it seeks an amendment to specially reference food production, as one of the components of resilience. Natural hazards (and the effects of climate change) pose a risk to essential human health needs including food production, as these events can disrupt food supply. The Paris Agreement speaks to speaks to a 'fundamental priority of safeguarding food security' and action in a manner that does not threaten food production.	Amend Objective 21, The resilience of our ~~C~~communities, **including food production and food security,** ~~are more resilient to natural hazards, including the impacts~~ and the natural environment to the short, medium, and long-term effects of climate change~~;~~ and sea level rise is strengthened, and people are better prepared for the consequences of natural hazard events.
Chapter 3.9 Regional form,			

design and function			
Chapter (3.9) introduction	Support in part	It is noted that a focus of Proposed Change 1 is to addressing the lack of urban development capacity and the interface between urban development and freshwater. It would be remiss in our view to not include a productive and sustainable rural environment in planning provisions regarding regional form, design and function. In particular, the RPS should protect highly productive land for food production and from reverse sensitivity. The NPSHPL notes that there needs to be integration in the management of HPL with freshwater management and urban development The Wellington Regional Growth Framework (WRGF) which this RPS acknowledged in their constraints analysis: • highly productive land (as Wāhi Toitū) • high quality soils (as Wāhi Toiora). The WRGF noted that the Wairarapa and Horowhenua contain important areas of highly productive land (noting the boundary of this work extended into the Horizons region). The amendments sought seek to acknowledge the highly productive land resource as part of these provisions.	Add: ***The region also includes highly productive land, a finite resource which has long-term values for land-based primary production, including for food security.*** AND, Amend, paragraph 9: *We need to recognise and provide for other regionally significant values and features, including managing freshwater, indigenous biodiversity, **highly productive land**, values of significance to mana whenua / tangata whenua and management of the coastal environment.* AND, Amend regionally significant issue B: *Inappropriate and poorly managed urban land use and activities in the Wellington region*

			have damaged, and continue to jeopardise, the natural environment, ***result in loss, fragmentation or reverse sensitivity effects on highly productive land****, degrade ecosystems, particularly aquatic ecosystems, and increased the exposure of communities to the impacts of climate change. This has adversely affected mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.* AND, Retain the issue expressed in regionally significant Issue 2, (which recognises that sporadic, uncontrolled and/or uncoordinated, development can result in the loss of rural land values for its productive qualities) but amend to reference highly productive land specifically: *(c) the loss of rural or open space land,* ***including****, valued*

			for its productive, ecological, aesthetic and recreational qualities, including ***highly productive land and it's long-term environmental, social, cultural and economic values.***
Objective 22	Support in part	As above – a more explicit reference to highly productive land is warranted.	Amend, *(e) Achieve the objectives in this RPS relating to the management of air, land* ***(particularly highly productive land and reserve sensitivity),*** *freshwater, coast, and indigenous biodiversity; and*
Objective 22B	Support in part	As above – a more explicit reference to highly productive land is warranted; it is not clear that this is currently provided for within the 'significant values and features' identified within the RPS. Strategic management of highly productive land is critical.	Amend, *Development in the Wellington Region's rural area is strategically planned and impacts on significant values and features identified in this RPS* ***and highly productive land*** *are managed effectively.*
Chapter 4.1 Regulatory policies – direction to district and			

regional plans and the Regional Land Transport Plan			
Policy 2	Support in part	Format/plan structure In the operative RPS, policy 2 is linked to Objective 1 (relating to amenity and peoples wellbeing in relation to odour, smoke and dust) and Objective 2 (human health in relation to fine particulate manner). It may be more logical to include new direction relating to greenhouse gases in standalone policy linked to the climate change objectives (e.g., Objective CC.3). It is unclear why the explanation in relation to the existing part of the policy is proposed to be deleted. The Explanation text refers to large-scale industrial boilers, rather the defined term 'large scale generators' Substantive comments on proposed additions Greenhouses that require heating do in some part of the country rely on coal as a fuel source. HortNZ support the direction to 'support industry to reduce greenhouse gas emissions from industrial processes' – this implies enabling actions that support transition to alternative fuels. The Emissions Reduction Plan seeks to: "*Ban new low- and medium-temperature coal boilers and phase out existing ones by 2037*".	Retain Policy 2 as per the operative RPS and include greenhouse gas emissions as a standalone policy. AND Align the policy wording with upcoming national direction. Amend the policy direction for greenhouse gas emissions: *Regional plans shall include policies, rules and/or methods that:* *a. support industry to reduce greenhouse gas emissions from industrial processes, and* ***x. avoid new coal boilers or the use of coal as a fuel source for domestic fires and large-scale generators*** *b. phase-out coal as a fuel source for domestic fires and large-scale generators by 203**07**.*

		HortNZ was a submitter on national direction being proposed in relation to process heat, which included consideration of timeframes and options for coal. A nationally consistent approach to phase out is preferred for industrial process heat using coal as a fuel source – HortNZ's submission seeks that the RPS is aligned to the national direction (and any forthcoming national direction specific to use of fossil fuels in process heat).	Amend associated explanation text accordingly (and to use consistent language): *and to phase out coal as a fuel source for domestic fires and large-scale industrial* ***generators*** ~~*boilers*~~ *by 203****0****~~7~~****7***.
Policy CC.5	Support in part	The term 'management practices' may be to specific and granular in scale – reflecting that at an on-farm management scale there may be trade-offs to be made between other outcomes such as those relating to freshwater and biodiversity. The wording 'change in intensity or type of agricultural land use' which is used in Policy CC.13 is considered more appropriate in terms of the level at which a regional plan might regulate. HortNZ consider that there needs to be a level of flexibility in land use and therefore seeks no increase at the regional, or if appropriate whaitua, scale. The scale component is currently undefined. Horticultural land use has lower greenhouse gas emissions than pastoral land uses; therefore, land use change to horticulture will reduce emissions, but there can be regulatory barriers. HortNZ seeks to an 'enable' change aspect to be considered in the regional plan provisions – e.g., this might look like provisions which enable growing to move within the region, suitable provisions for low impact horticulture. This is important for meeting national direction around highly productive land and also emissions reduction.	Amend, *Regional plans shall include objectives, policies, rules and/or methods to****:*** ***a.*** *avoid changes* ~~***to in the***~~ ***intensity or type of agricultural land use*** ~~***land use activities and/or management practices***~~ *that result in an increase, in gross greenhouse gas emissions from agriculture* ***at the region [or whaitua] scale, and*** ***b. enable land use change in the region to lower emissions rural land uses or land use practices.*** OR, in lieu of adding (b), add a new policy:

		The section 32 report refers to biogenic methane emissions -to provide clarity a definition should be included in the plan for 'agricultural greenhouse gas emissions' – as is noted elsewhere.	***Regional plans shall include objectives, policies, rules and/or methods that recognise the benefits of, and enable rural land use change that contributes to reducing gross greenhouse gas emissions from agriculture.***
Policy CC.7	Support in part	As above – HortNZ supports nature-based solutions where possible, however it acknowledges that other interventions will likely also be required. HortNZ supports this policy (of providing for nature-based solutions) but suggests a minor amendment to reflect our interpretation of the policy so this is clear.	Amend Explanation, to add: ***This policy does not preclude the use of other solutions, where necessary or appropriate.***
Policy CC.8	Support	HortNZ support a focus on support a focus on emissions reductions as the priority over offset.	Retain as notified.
Policy 12	Support in part/Oppose in part	The policy in essence restates the requirements of the NPSFM 2020, however risks not capturing the full context. The amendment to (b) is sought to recognise that the NPSFM 2020 provides for the long-term visions for freshwater to be intergenerational. The changes to the NRP may only be one step along that journey in some cases (e.g. there can be interim target attribute states). Target attribute states and environmental flows and levels must be set in a way that will achieve the long-term vision.	Amend Policy 12, to refer more generally to the regional plan implementing the requirements of the NPSFM 2020, Or if the policy approach remains, amend (b), *Achieve,* ***or contribute to achieving****, the long-term visions for freshwater*

		Limit setting must have regard to the long-term vision.	
Policy 15	Support in part	It is noted that the RPS does not include definitions for earthworks or vegetation disturbance – this would assist in providing clarity to the policy.	Retain, however consider providing definitions for earthworks or vegetation disturbance.
Policy 17	Oppose in part	In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, HortNZ seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people. It appears to contextualise Te Mana o te Wai in the region – HortNZ consider growing fruit and vegetables for New Zealanders is part of providing for the health needs of people. HortNZ suggest an amendment in this context. The phrasing at the beginning of the policy suggests this is limited to policies, rules or methods – a more general 'in managing freshwater' statement is suggested and/or wordings that provides clarification as to how this be implemented. In respect of the second priority of Te Mana o Te Wai, HortNZ consider that growing fruit and vegetables for domestic consumption is necessary for the health needs of people and relates to freshwater management. HortNZ seeks an amendment which recognised and provides for this within the hierarchy of obligations expressed in this policy. In addition: • In terms of the items listed, these are broadly framed; HortNZ seeks that these are 'ring-fenced' to drinking	Amend, *Regional plans shall* ***in managing take and use of water and discharges to freshwater*** ~~***include policies, rules and/or methods that***~~ *prioritise****s*** *the health and wellbeing of the waterbody and freshwater ecosystems first, and then prioritise*~~***s any take and use of water*** *from any river or groundwater source provides sufficiently*~~ *for the health needs of people*~~*, including:*~~ *The health needs of people include:* *(a) the taking of water by any statutory authority that has a duty for public water supply under any Act of Parliament* ***for drinking water or other essential health need****;*

		water (or other essential human health needs) – recognising that public water supplies also support commercial activities. • Fruit and vegetables are essential for the human health of New Zealanders. Horticulture produces healthy food to support the essential health needs of people. Food production, food supply and food security must considered alongside other uses for essential human health. HortNZ's view that the health needs extend beyond just water takes.	*(b) the taking of water for reticulation into a public water supply network* ***for drinking water or other essential health need;*** *(c) the taking of water for community* ***drinking water*** *supplies; and* *(d) the taking of water for marae.* ***(e) food production that contributes to domestic food supply.***
Policy 18	Support in part	Many clauses reflect the NPSFM 2020 direction – e.g. clauses (a), (f), (g), (h). Where the references differ, or are framed differently, this may create interpretation issues. While clause (c) reflects Policy of the NPSFM (in respect of natural inland wetlands), how does this interface with the exclusions/exemptions provided for under the NPSFM? It is also noted that whether the NPSFM was intended to, or will apply to coastal wetlands is still subject to change. There is a grammatical error in clause (g), where protecting and protected are duplicated. Support promoting storage in (l), however seek this applies to water storage broadly. Clause (e) more stringent that Policy 7 NPSFM of the RMA which reads" The loss of river extent and values is avoided to the extent practicable." The proposed change is missing 'to the extent practicable' – it is unclear why/whether this is intentional.	In lieu of listing (c) to (h), refer to the NPSFM 2020 more generally, E.g. *x. as required to give effect to the NPSFM 2020* Amend (g) to correct grammatical error; Amend (e) to add to the extent reasonable practicable, *(e) avoiding the loss of river extent and values to* ***the extent practicable;*** Amend (l), *Promoting the installation of* ***~~off-line~~*** *water storage.*

Policy FW.1	Support in part	This provision refers to 'registered water suppliers and users' in the body of the policy, but 'municipal water supplies' in the explanation. The use of the term 'registered water suppliers' means that the scope of the policy is potentially very broad - light of recent changes to the drinking water statutory framework e.g., Water Services Act, which has changed who is a 'drinking water supplier' – however the policy appears to be most relevant to Council supplies.	Amend Policy FW.1, to use consistent and clear language (municipal water supplies, or other term with similar meaning), *Regional plans shall include policies, rules and/or methods to reduce demand of water from* ***~~registered~~ municipal*** *water suppliers and users, including:*
Policy FW.2	Support in part	As above.	Amend Policy FW.2, to use consistent and clear language (municipal water supplies, or other term with similar meaning), *District plans shall include policies, rules and/or methods to reduce demand of water from* ***~~registered~~ municipal*** *water suppliers and users, including where practicable:*
Policy 29		Support using a risk-based approach, this is valid both in determining natural hazard risk and in the management response – for example, a non-habitable farm buildings for example are less of a risk compared to new residential development. The direction of avoiding all subdivision, use or development in areas where hazards and risks are assessed as high too extreme may be too onerous in all circumstances.	Amend clause (d), *include objectives, polic****ie****s and rules to avoid subdivision,* ***or inappropriate*** *use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.*

Chapter 4.2 Regulatory policies – matters to be considered			
Policy IM.1	Support in part	HortNZ support a more consistent and efficient approach to resource management that includes partnership with mana whenua / tangata whenua. HortNZ's support this being focused on the plan-making level and governance, so that values inform the plan approach. In respect to consent applications, this clause needs to be appropriate to the size/scale/significance of the consent.	Consider providing further clarification in respect to partnering with mana whenua / tangata whenua at the consenting level.
Policy CC.13	Support in part/oppose in part	As previously noted need to be clear on the definition of 'agricultural greenhouse gas emissions' so that it is clear what will be assessed. This policy does not address the scale at which the assessment occurs; HortNZ seeks this is at the region (or if appropriate, whaitua scale). This is important to retain land flexibility while also driving towards lower emissions. If this is applied in a way which is too 'absolute' resulting in unintended consequences - for example, land use change between similar emissions land uses (such as grapes to applies) may otherwise be unnecessarily restricted despite overall positive outcomes. There could also be impacts on for example, food supply. HortNZ also seem a more 'enabling' approach. Climate Change Commission analysis in Ināia tonu nei: a low emissions future for Aotearoa shows that even without new technologies, Aotearoa can reduce agricultural emissions through efficiencies on farms,	Amend, *When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to:* *(a) reducing gross* ***agricultural*** *greenhouse gas emissions as a priority where practicable, and* *(b) where it is not practicable to reduce gross* ***agricultural*** *greenhouse gas emissions, achieving a net reduction in*

		and by switching some pastoral land to forestry and horticulture. Land use change to horticulture should therefore been provided for. This is important for meeting national direction around highly productive land and also emissions reduction. The policy and/or explanation could add further context to what tools will be used to support this assessment. The policy should have a limited applicability, from when the RMA enables such considerations (noting that this date will have passed once the RPS changes becomes operative) and only until such time as the regional plan specifically addresses greenhouse gas emissions, as the RPS directs.	*greenhouse gas emissions, and* *(c) avoiding any increase in gross* ***agricultural*** *greenhouse gas emissions* ***at the region [or whaitua] scale.*** ***(d) providing for land use change to horticulture.*** Include, ***This policy does not take effect until November 2022 and will cease to apply once Policy CC.5 has been implemented through the regional plan.***
Policy 40	Support	The considerations are generally consistent with the NPSFM direction.	Retain
Policy 41	Oppose	HortNZ question whether this policy is necessary, because: • Environmental outcomes and target attribute states in (a) are not yet set, presumable also suspended sediment limits under NPSFM • Earthworks is currently managed by regional and district plans, and there is direction elsewhere (in the RPS changes) directing the management in these plans – when they come through apply to consenting.	Delete Policy 41

		Additionally, avoiding discharge where suspended sediment – it is not clear if this is a practicable option in all circumstances. Section 107 of the RMA also provides considerations for the grant of discharge permits.	
Policy 44	Support in part	For similar reasons as above – clauses (c) and (e) are too specific given NPSFM process for whaitua which set the environmental flows and levels, and take limits through the NPSFM 2020 process. In addition: • Take limits need to be set to meet environmental flows and levels, so there is not a need to include both; • Take limits will be set to provide for freshwater values, therefore it is not necessary to state the additional text.	Amend, *When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional plan to take and use water, Te Mana o te Wai must be given effect to**, and so that**: ~~particular regard shall be given to:~~* *(a) Māori freshwater values, including mahinga kai are provided for;* *(b) sites of significance, wāhi tapu and wāhi tupuna are protected;* ***(c) Where take limits have been set, take limits are achieved;*** ***~~(c) Environmental flows and levels, including variability of flows, are achieved;~~*** ***~~(d) Take limits are achieved that provide for flow or level variability, safeguard ecosystem health, provide for~~***

			~~the life cycle needs of aquatic life, and take into account environmental outcomes;~~ *(e) ~~whether~~ the applicant has demonstrated that the volume of water sought is reasonable and justifiable for the intended use, including consideration of soil and crop type when water is taken for irrigation purposes;* *(f) requiring the consent holder to measure and report the actual amount of water taken; ~~and~~* *(g) requiring the consent holder to adopt water conservation and demand management measures and demonstrate how water will be used efficiently; <u>and</u>* *<u>(h) there is consideration of alternate water supplies such as storage or capture of rainwater for use during the drier summer months</u>*
Policy FW.5	Support in part	Support regard being given to climate change impacts and development of water storage. However this policy should not just be limited to urban development.	Amend, *<u>Policy FW.5: Water supply planning for climate change</u> ~~***and***~~*

			~~urban development~~ *– consideration* … *(c) development of future water sources, storage, treatment and reticulation,* ***including water storage schemes****; and*
Policy 51	Oppose in part	Change consistent with elsewhere.	Amend, g) avoiding ~~inappropriate~~ subdivision, **inappropriate** use or development**,** and *hazard sensitive activities* where the hazards and risks are assessed as high to extreme; ~~in areas at high risk from natural hazards;~~

Policy 52	Support in part	Highly productive land is a natural resource that will need to be carefully managed with a changing climate so this land can continue to meet the reasonably foreseeable needs of future generations. With a changing climate we can expect the following impacts. Natural hazards pose a risk to food production and events can disrupt food supply – there may be situation where structural protection works or hard engineering methods are warranted.	Amend (c), *(c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development,* ***highly productive land with food security values****, regionally significant infrastructure or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best practicable option for the future;*
Policy 55	Oppose in part	New urban development beyond the region's urban areas should consider highly productive land, which is recognised elsewhere in the (operative) RPS.	Amend Policy 55, *(ii) the location, design and layout of the proposed development shall apply the specific management or protection for values or resources identified by this RPS, including:* … ***9. Protecting highly productive land from inappropriate subdivision, use and development***
Policy 56	Support in part	Support retaining the considerations in (a), however the policy could be more specific as to the type of development is trying to	Amend Policy 56 to provide clarity as to what it applies to,

		capture. The explanation to the policy previously stated that it relates to urban development and rural residential development, this clarity has been removed. HortNZ's interest is ensuring that primary production activities are appropriately provided for (and enabled) in the rural environment; this is important for meeting national direction around highly productive land and also emissions reduction. The policy intent in the Section 32 evaluation report indicates the focus of this policy is on urban development.	***This policy applies to urban development and rural residential development.*** OR, if the policy remains more general in application, amend to add: ***x. The use of highly productive land for food production is enabled.***
Chapter 4.4 Non-regulatory policies			
Policy CC.15	Support	Support improving rural resilience to climate change, including in promoting and supporting land uses that will reduce gross greenhouse gas emissions	Retain as notified.
Policy CC.16	Support in part	Support development of strategic climate change adaptation plans, seek some amendments to provide for water storage.	Amend to add, ***Options for water storage to promote resilience for rural and urban communities.***
Policy FW.7	Support	HortNZ support promotion and support of options for water attenuation and retention, such as groundwater recharge and water storage at varying scales. These will be important for climate change resilience.	Retain as notified

Policy FW.8	Support in part	Land use change is an option for reducing emissions.	Amend Policy FW.8, *(c) supporting primary sector groups and landowners in researching and promoting climate resilient* ***or lower emissions*** *land uses and pathways to move to new land uses.*
Policy 67	Support in part	Policy 67 previously includes (g) safeguarding the productive capability of the rural area. A mention of highly productive land is valid in terms of establishing urban environments.	Amend to add, **(g) recognising the values of highly productive land, including long-term for food production**
Chapter 4.5 Methods to implement policies			
Method FW.1	Support	HortNZ support the development of Freshwater Action Plans as part of the NPSFM 2020 approach, this should also involve communities.	Amend, *Prepare Freshwater Action Plans in partnership with mana whenua / tangata whenua,* ***and with communities*** *as required by the NPS-FM to contribute to achieving the target attribute states set in the NRP,*

Method 32	Support in part	HortNZ consider highly productive land to be of significant value. The NPSHPL 2022 will require a mapping exercise.	Amend, **x. identify areas of highly productive land**
Method 34	Support	Support the development of a regional water supply strategy, this could cover both urban and rural communities, a minor amendment is sought clarify that.	Amend, *d) secure sustainable water supplies for **urban and rural** communities across the region, preparing for climate change;*
Method CC.5	Support	HortNZ agree it is appropriate to review the approach to reducing agricultural greenhouse gas emissions, to align with national direction as there has been significant work undertaken through partnerships such as He Waka Eke Noa.	Retain
Method 48	Support in part	HortNZ support providing for water transfers, and the need to consider climate change. A minor amendment to (i) is sought to align with overall climate direction.	Amend, *(i) land use change to **lower emissions or** more climate resilient uses is promoted* And, correct grammatical errors in (c), (d), (g), (h) – in how they link to the "Review water allocation policy in the regional plan so that:" statement.

Method CC.8	Support in part	Support the general intent, land use change to horticulture is also an option for reducing emissions – amendment is sought to (c) to reflect this. Support (f), as it is important this this is aligned with other initiatives.	Amend, *(c) promoting and supporting actions to reduce agricultural gross greenhouse gas emissions and/or increase climate resilience,* ***including options for land use change to horticulture***
5 Monitoring the RPS and progress towards anticipated environmental results			
Anticipated environmental results (AER) Regional form, design and function	Support in part	As elsewhere, urban development needs to be carefully planned to protective the values of highly productive land.	Amend (5), *Urban expansion is carefully planned including occurring in locations and ways that are well connected, support the protection of freshwater ecosystems,* ***retain highly productive land*** *and improve resilience to the effects of climate change*

Appendix 3: Definitions			
Highly productive agricultural land (Class 1 and II land):	Amend definition	Amend the existing RPS definition, to be more consistent with the NPS for Highly Productive Land 2022, and the WRGF, to capture Land use classes 1-3.	Amend definition, *Highly protective agricultural land is Class I* ***~~and,~~*** *II land* ***and III*** *in the land use capability classes of the New Zealand Land Resources Inventory* Consequential amendment to Policy 59
New definition – Agricultural Green House Gas Emissions	New definition	To provide clarity to the policy direction relating to agricultural greenhouse gas emissions.	Add definition, ***Agricultural Green House Gas Emissions means methane from ruminant animals, and nitrous oxide from animal waste and nitrogen in fertiliser.***
Hazard sensitive activity	Oppose in part	It is not clear what scale of activity might be invertedly captured by 'hazardous facilities', whereas major hazardous facilities is a term defined through regulations e.g. Health and Safety at Work (Major Hazard Facilities) Regulations 2016.	Amend, • ***~~hazardous facilities and~~*** *major hazardous facilities*