SUBMISSION ON

Auckland Council: Southern Rural Strategy

1 December 2024

To: Auckland Council, Southern Rural Strategy
Name of Submitter: Horticulture New Zealand

Contact for Service:

Leanne Roberts
Senior Environmental Policy Advisor
Horticulture New Zealand
PO Box 10-232 WELLINGTON
Ph: 027 546 1655
Email: leanne.roberts@hortnz.co.nz

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 Auckland Council for the opportunity to submit on the draft Southern Rural Strategy and welcomes any opportunity to continue to work with Auckland 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

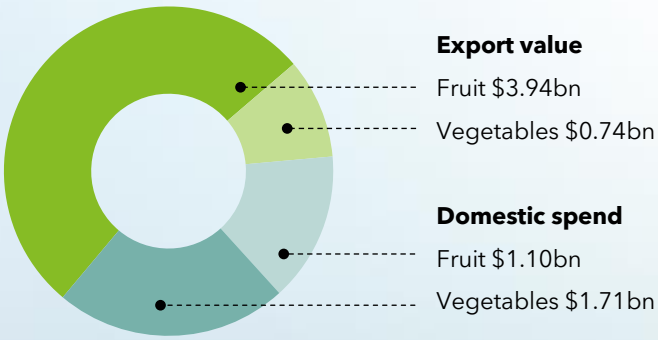
HortNZ represents the interests of approximately 4,200 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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.



Industry value $7.48bn

Total exports $4.67bn

Total domestic $2.81bn

Source: Stats NZ and MPI

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 3

Submission

1. Horticulture in the Auckland Region

The Auckland region is an important part of the national food production system. Of significance, there is the Pukekohe growing hub which plays a critical role in the domestic supply of vegetables to support the population of New Zealand[1].

There are approximately 7602ha of horticultural land in the region. Of this, 4946ha are in commercial vegetable production. In addition, there are 848m^2 of indoor greenhouse production,[2] the largest concentration of greenhouse activity in New Zealand. This is of regional, if not national, significance. There is a large degree of diversity in crops produced, with horticultural operations producing onions, potatoes, kiwifruit, avocado, leafy vegetables, brassicas, lettuce, pumpkin and carrots.

There are a large amount of cross-boundary interactions with Waikato Region where many Pukekohe vegetable growers also have some of their operations located.

2. National issues and the Auckland productive region's role

2.1. Food Security

The Paris Agreement speaks to a 'fundamental priority of safeguarding food security' and taking climate action in a manner that does not threaten food production.[3] Food security is a nationally important issue which needs to be addressed at a strategic level.[4] We have 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.

The Auckland region plays a critical role in the national domestic supply of fruit and vegetables. The Pukekohe area, in particular, is recognised for its productive capacity. The unique soils and climate provide an ideal environment for year-round growing. Māori have had a long history of cultivation, with Pukekohe recognised as a key productive area that supported a robust economy with crops being traded with other communities outside the region[5]. Auckland still maintains a high degree of crop diversity with a climate that is ideal for growing a wide range of horticultural crops[6].

The recent NZIER report "Making the economic case for vegetable production in New Zealand" outlines that vegetable growing needs to be recognised as a national priority as this is the only way that the volume and variety of vegetables we currently enjoy can

[1] Proposal_A4
[2] Fresh-Facts-2024---Online-Version.pdf
[3] ADOPTION OF THE PARIS AGREEMENT - Paris Agreement text English
[4] NZIER-report-Making-the-economic-case-for-vegetable-production-in-NZ-FINAL.pdf
[5] Heritage resources: Heritage (doc.govt.nz)
[6] Auckland ClimateWEB.pdf (niwa.co.nz)

continue. Pukekohe is nationally significant for its role in producing vegetables for the population of New Zealand, and any reduction in area will have a flow-on effect to consumers through an increase in price of fresh vegetables. [7]

This last season has seen a good supply nationally of fresh fruit and vegetables, as there have been optimum growing conditions and few significant weather events this last season. However, prior to this, the price of NZ grown fresh fruit and vegetables had been steadily increasing as a result of weather events and the COVID-19 pandemic causing shortages in supply[8]. This can be attributed to labour shortages, increased costs in compliance, increased costs of horticultural supplies as well as freight and energy costs[9]. This also speaks to the volatile nature of pricing caused by supply and demand forces in the fresh produce industry.

Consumers are price driven, and the consequence of high production costs of New Zealand produce or weather events causing supply shortages, is that retailers will look to importing produce or substitutes to meet consumer expectations of price. Importing fresh fruit and vegetables produced in other countries that can otherwise be grown in New Zealand increases carbon leakage due to freight and supports less climate-friendly growing and environmental practices in other countries. This is one reason why it is important for regional councils to consider their local role in the national production of horticultural crops for our population.

2.1.1. WEATHER EVENTS AND THE IMPACT ON DOMESTIC FOOD SUPPLY

Vulnerabilities in our domestic food supply network have been highlighted during recent weather events with availability of fresh New Zealand grown produced being impacted by the recent rain events[10], and Cyclone Gabrielle causing damage to key horticultural growing areas such as Pukekohe, Northland, and the East Coast regions of Gisborne and Hawkes Bay[11].

The timing of these events also increased the scale of impact, as many seasonal crops were in their harvest period. Considerable investment into growing the crop was lost, along with the product and flow-on impacts to employment, health and safety.

The recovery in some areas from these events is likely to be long, and the ongoing supply of fresh fruit and vegetables vulnerable during this recovery. Covered crops as pointed out above, aren't exposed to the same vulnerabilities, so while they require a certain level of carbon in their production, they provide a more secure growing environment which is less likely to be disrupted due to extreme weather events.

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[7] NZIER-report-Making-the-economic-case-for-vegetable-production-in-NZ-FINAL.pdf
[8] Fruit and vegetables drive up annual food prices | Stats NZ
[9] Food prices are up, but the cost to grow it has skyrocketed | Stuff.co.nz
[10] Auckland storm event 9 May 2023 rapid analysis (knowledgeauckland.org.nz)
[11] Cyclone Gabrielle's impact on the New Zealand economy and exports - March 2023 | New Zealand Ministry of Foreign Affairs and Trade (mfat.govt.nz)

3. Horticulture needs

3.1. Land use, water and horticulture needs

It is the view of HortNZ and growers that the Southern Rural Strategy (SRS) should primarily plan for how production activities will be provided for to support the growth in population the Auckland Future Development Strategy signals. The key areas the SRS focuses on have high presence of primary industry, and, in particular, the nationally significant horticultural production area of Pukekohe.

The Pukekohe ICMP project was established in recognition of the freshwater quality issues and impacts from commercial vegetable production in the area and the need to ensure vegetables can be produced. This has been a multi-year discussion with Manawhenua, PVGA, HortNZ, Auckland and Waikato Regional Councils and central government. This has resulted in the establishment of the Te Tautara o Pukekohe Trust[12] who administers $5.6 million to 11 projects that have been funded out of the process. This collaborative and local-led approach to addressing the need for vegetables production to occur while addressing freshwater quality issues is innovative and has been a collective effort to identify issues, projects and way to work together to improve freshwater quality.

Freshwater use and access is important to consider in the context of the SRS. Short rotational cropping is dynamic in both use of water and location, and semi-permanent tree crops orchards, such as kiwifruit, have requirements for post-harvest facilities to be located near orchards and farms to ensure produce is safe and washed in accordance with food safety and market regulations. The Franklin Water Demand Study, attached as Appendix 1, highlights the future freshwater needs of the horticulture sector in the area. As land use classes are naturally occurring and a finite resource, it is important to consider land availability, capability and access to freshwater together to ensure development is occurring in such a way that it does not adversely or prevent horticultural production.

3.1.1. IRRIGATION

Water takes for irrigation of horticultural crops are used to supplement rainfall. Irrigation is used more frequently in the summer months when rainfall is lower and typically less through the winter months. Irrigation of crops is matched to crop demand, and it is important to note that over-irrigation of a crop can be as problematic as underwatering a crop. Many factors influence how much water a crop will require, including type of crop, stage in growth cycle, climatic conditions, etc.[13] Generally, growers work within their local climate and environment to ensure crops receive adequate water to produce a marketable yield. It is important to note that water demand on a parcel of land is variable as short-rotational vegetable cropping practices mean soil health is managed by ensuring crops are rotated across different parcels of land to reduce soil, pest and disease pressure. Different crop types have different water and nutrient requirements.[14]

[12] About – Te Tautara o Pukekohe
[13] CHAPTER 2: CROP WATER NEEDS (fao.org)
[14] Importance of Crop Rotation (bayer.com)

3.1.2. POST-HARVEST WATER REQUIREMENTS

Growers need to work within food safety and market requirements to ensure produce is safe and fit for human consumption.[15] Part of food safety frameworks which are incorporated into commercial accreditation programmes such as New Zealand Good Agricultural Practice (NZ GAP) is the requirement to test water for contaminants such as *E. coli*. It is important that water used to wash produce is of a quantity and standard to ensure produce is clean and safe for consumers before it makes it to market. In addition to water testing and food safety processes within an operation, produce sold through retailers and markets is subject to random testing to provide consumers with confidence that the produce they purchase has been grown and produced in a way that it is safe to eat.

Post-harvest facilities are an important part of the produce supply system that support fresh fruit and vegetables being prepared for consumption after being harvested from the paddock. These need to be provided for within the SRS to support production on highly productive land.

3.1.3. NATIONAL DIRECTION AND SUPPORT FOR HORTICULTURE

The National Policy Statement for Highly Productive Land (NPS HPL) provides a clear direction about how to protect highly productive land for land-based primary production. The NPS HPL, as currently drafted, does not distinguish between LUC 1, 2 or 3 land as needing different levels of protection and treats these classes equally in recognition of the productive capacity of this land.

Minister Parker's letter to regional councils sent in April 2023 sought information about how vegetable growing is being provided for in NPSFM plans.

The National and Built Environment Act select committee reports recommended the NBA must provide direction on enabling supply of fresh fruit and vegetables.[16] While this legislation has been repealed, the recognition of the vulnerability to our domestic food supply and the role of horticulture as critical for supporting the health needs of the population is unchanged.

In addition, the Aotearoa Horticulture Action Plan seeks to provide a framework to grow the value of the horticulture industry to $12 billion by 2035.[17] This is a 'quadruple helix' strategy that involves a combination of effort between industry, government, Māori and growers.

While we are in a time of regulatory change, HortNZ believes there is clear support for the horticulture industry and ensuring domestic vegetable production is provided for when developing plans and documents that guide the future of regions. HortNZ is mindful that the SRS will inform other planning documents and have a direct impact on land use.

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[15] 2019-07-24-Guidelines-for-Fresh-Produce-Food-Safety-2019-WEB.pdf (hortnz.co.nz)
[16] 404 Not Found - New Zealand Parliament (www.parliament.nz)
[17] Growing together 2035 – Aotearoa Horticulture Action Plan (February 2023) (mpi.govt.nz)

If the ultimate higher purpose is to create plans for the future that help guide development and how our population will be housed, where they will grow and be supported, it is critical the following are considered:

- Climate change adaptation and opportunities;
- Land use change;
- Horticulture's potential and role in transitioning to a low emissions economy; and
- Regional growth and development: how we feed the growing population and support populations through employment opportunities.

The SRS needs to provide structure and guidance on how regions will grow and support the growing population. There needs to be balance between development of land and production on the land to support the population. The SRS should be providing the plan on how rural production will be prioritised to support the growing population and development outlines in the Auckland FDS.

3.1.4. NATIONAL POLICY STATEMENT FOR HIGHLY PRODUCTIVE LAND

The NPS HPL came into effect October 2022. The NPS HPL is a blunt tool to manage appropriate use of land deemed highly productive (LUC 1, 2 & 3), primarily through the requirement of Councils to map and zone highly productive land and manage the subdivision, use and development of this land.

The recent amendments to the NPS HPL make it clear that greenhouses are an appropriate activity to be located on highly productive land[18]. This is important to consider in the Auckland context with a large covered cropping industry in the region. Some of these operations will be considering how to address upgrades to their infrastructure or relocation and new construction as their facilities either reach the end of their useable life or expansion is required.

Newer, innovative approaches to growing may also see growers look to incorporate greater levels of environmental protection into their operation to provide support and protection of crops from weather events. This may be in the form of covered crop protection structures or investment into complete environmentally controlled greenhouse operations.[19] There is likely to be a challenge to the traditional approach to horticulture with growers incorporating greater levels of technology and automation into their operations to support better environmental practice and crop production.

Land is a finite natural resource that needs to be managed to meet the needs of people now and those of future generations. Sustainable food production is the primary value associated with this resource.

Highly productive land is made up a combination of natural and physical resources, and these together with social, legal and investment decisions define the potential productive capacity of land.

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[18] 3.2 (aa) NPS-HPL-with-2024-Amendments.pdf
[19] LeaderBrand | Grow Regions

Productive capacity of highly productive land depends on good planning and policy decisions to support its use. Signalling a blanket-rule approach to creating riparian planting buffers of 10 – 20 m either side of waterways, including intermittent streams, will result in a significant loss of productive land, impact growers' ability to operate irrespective of what other erosion and sediment loss measures they have in place.

Policies to manage ad-hoc urban and lifestyle development are essential to maintain the highly productive land resource for future generations. Highly Productive Land is a finite resource and intergenerational asset that is under threat in New Zealand – most significantly due to urban development, as reported in 'Our Land 2021', which states that the area of highly productive land that was unavailable for horticulture because it had a house on it increased by 54% from 2002 to 2019.[20]

There are many elements that contribute to the productive capacity of land, but land itself is the primary aspect. When land is fragmented or urbanised it is seldom retuned to productive uses.

The values of highly productive land and potential costs and benefits of enabling and/or allowing urban expansion onto highly productive land should be specifically considered as part of the process of identifying areas that may be appropriate for future expansion. The impact of losing that land to primary productive use is a matter that should be specifically investigated, and those findings then considered, alongside other relevant matters, when decisions about areas that are potentially suitable for future urban expansion are made.

HortNZ do not consider it acceptable to continue to support the loss of highly productive land to urban use or development in the Southern Auckland area when a National Policy Statement is in place and other options are available to address urban growth needs. The food security of the region and nation should not be compromised.

4. Draft Southern Rural Strategy

As a stated sub-set of Auckland Council's Future Development Strategy, HortNZ is supportive of the general approach taken by Auckland Council outlined in the principles.

There is a strong emphasis on prioritising and supporting primary production in the principles. However, the remainder of the SRS falls short of providing for these principles to be given effect to.

The SRS is an opportunity to plan for the production required to support the growing population and recognise the significance of areas such as Pukekohe and the role they play in the national food network.

For the most part, the latter part of the strategy reforms and outlines what policies are in place but offers no real guidance on how the primary production sector will be supported and enabled. The strategy is an extension of existing urban growth policy as it applies to southern rural located towns and settlements. This is not a strategy that describes the

[20] Our Land 2021. Ministry for the Environment.

current or future state of primary production in Auckland nor the challenges and opportunities.

4.1. Introduction

The introduction sets the scene for the document. It is important the right context is provided to give meaning to why the strategy has taken the approach it is. With the challenges of population increases and housing, the rural areas, and the rural south in particular, will provide support for these growing populations. Auckland is New Zealand's most populous city, and much of the economic activity in the region comes from activities within the city. Relatively, the rural area of the region covers a larger area, has a smaller population proportionately compared with the urban area and requires different considerations to enable this area to be functional into the future compared with a highly dense urban area.

The Deloitte Pukekohe Hub report captures the challenges of ensuring Auckland and Waikato create the right settings to ensure food production can continue to support the national food network while planning for a growing population locally and nationally. The alternative will result in constraining the growing area and undermining the national food supply, which will have very real impacts on New Zealand as food supply is diminished[21].

HortNZ are interested to know what data, information and analysis were used in conjunction with feedback to inform the draft SRS. In particular, we are interested to understand what productivity data informed the assumptions in the draft.

4.2. Part 2: Context

4.2.1. ECONOMY AND INDUSTRY

HortNZ is unsure about the accuracy of the data in this section. The significance of the horticulture sector in the Southern Rural Area is not reflected given its national significance. Nationally, the Horticulture sector's value is $7.48bn[22]. This is the combined value of both export and domestic earnings, as well as representative of total earnings across fruit and vegetable sectors. Pukekohe provides the right combination of climate, soils and infrastructure needed to support horticulture. While Pukekohe is one of the key vegetable production areas nationally, the horticulture sector would form a small part of Auckland's total economy – belying its importance for our national health and domestic fresh food requirements.

Statistics NZ data on which industries contribute to the Auckland regional GDP do not highlight any primary sectors in the top 5 contributing industries, and identify the contribution of forestry, fishing, mining and agriculture as 0.03% rather than the 3% stated in the proposed SRS[23].

The recent NZIER report outlines the challenges to policy makers when considering development and freshwater policy, costs to growers and consumers of policy or plans that restrict or constrain vegetable production, and the benefits and trade offs that may

[21] Pukekohe Hub | Primary Sector | Deloitte New Zealand
[22] About us | Horticulture New Zealand – Ahumāra Kai Aotearoa
[23] Which industries contributed to your region's GDP? | Stats NZ

be required. What the report highlights is loss of space or policies that constrain vegetable growing, especially in key areas such as Pukekohe will likely result in impacts on supply and an increase in price to the consumer for vegetables[24].

4.2.2. NATURAL ENVIRONMENT

This section refers to the natural environmental features of the area covered by the SRS. The overview refers to highly productive soils, when this should be amended to highly productive land. HortNZ is interested to understand what the other important soil values referred to are. While there is a high concentration of LUC 1, 2 and 3 land in the SRS area[25], it is the combination of climate, soils and topography that make the Pukekohe area well suited for vegetable production. Other LUC of soil can also be productive in different ways; however, this is also based on the assumption that there are adequate resources such as freshwater and good planning decisions to enable the land to be used for productive purposes.

4.3. Part 3: Strategic Framework

The strategic response has been formed only in terms of population data and with no real consideration of primary production activity and what is required to ensure this can occur in the context of significant population growth. Employment and housing requirements are two considerations, but supporting and feeding the increase in population has not been given enough consideration.

4.3.1. VISION: AUCKLANDS SOUTHERN RURAL AREA GROWS AND CHANGES IN A WAY THAT PROMOTES LIVEABLE COMMUNITIES, RURAL PRODUCTION AND RESILIENCE

In the first column relating to rural form and growth, there is significant focus on ensuring rural business and residential growth is provided for. While section 1b specifies that the integrity of rural production and industries is protected, the document appears to treat these as ancillary or as a secondary consideration. Within the whole Auckland region, there is likely further opportunity for housing developments to occur in places other than the southern rural productive area. What is required to support the rural area is provision for activities that support production of crops ready for market, including post-harvest facilities, water for irrigation and preparation of crops to meet food safety standards and good transport networks that facilitate the transportation of produce to markets and distribution centres.

The second column is referring to supporting resilient rural communities. The question is how to provide and prioritise rural production in the SRS when it is a minor part of the Auckland economy by GDP yet encompasses a relatively large geographic area and is nationally significant for supporting a healthy population.

[24] NZIER-report-Making-the-economic-case-for-vegetable-production-in-NZ-FINAL.pdf
[25] Baseline Highly Productive Land » Maps » Our Environment

4.4. Principles

HortNZ is supportive of the approach in the principles. They provide an intent to ensure primary production is able to operate and production is prioritised in the main production areas the SRS relates to.

HortNZ would like to see inclusion of the requirement for facilities, such as post-harvest facilities, to be enabled and supported to ensure the produce is able to be washed and prepared for market. Post-harvest washing and preparation of produce is a time sensitive activity and necessary to ensure produce is able to meet consumer and food safety requirements.

In addition, it is also important to capture the need for other development that supports primary production, ensuring the SRS allows for greenhouse redevelopment or establishment is a priority for the SRS.

4.4.1. PRINCIPLE 1: ENSURE THAT THE FORM OF RESIDENTIAL AND BUSINESS GROWTH IS APPROPRIATE AND HAPPENS IN THE RIGHT PLACE, AT THE RIGHT TIME

The principle speaks to residential and business growth; however, it does not specify what rural business growth needs to be supported. Rural business needs are different from urban business requirements. Growers need to be able to have strong reverse sensitivity policies in place, consideration of how intensification at boundaries between urban and rural zones are managed to ensure they can produce and what other support and infrastructure needs they have to get produce from paddock to market. There needs to be consideration of where sensitive activities such as residential housing, and schools are situated and recognition that some of these activities conflict with primary production activities.

Principle 1b speaks to protecting the integrity of rural production and industries yet does not address the issues that come from competition for resources such as water, which are essential inputs for primary production and growing of crops. Competition for resources increases with urban intensification. This principle also refers to safe access for residential and rural production users, but highlights funding constraints. Increased small vehicle use in the southern rural area will result from an increase in population that commutes to the city centre for employment.

4.4.2. PRINCIPLE 2: STRENGHTEN RESILIENCE IN RURAL COMMUNITIES AND THE RURAL AREA

Rural resilience in the Auckland context is through the challenge of balancing the expansion needs of the country's largest urban centre with the production that occurs in a significant geographic area in the south of the region. Rural productivity and resilience are contingent on having the right infrastructure, including transport routes, in place to support production.

4.4.3. CLIMATE DISRUPTION

Land use change is an inevitable climate change impact and will also be one of the key responses to the effects of climate change. The RMA Amendment Act 2020 requires

Councils to have regard to the Emissions Reduction Plan 2022 which includes a focus area on transition to low emissions land use. The rate of future climate change will be determined by the response to it and land use change has a role in that rate of change.

We note that diversification to horticulture presents an opportunity to reduce emissions while increasing food production, as identified by the Climate Change Commission.[26] The report *Ināia tonu nei: a low emissions future for Aotearoa* includes the assumption (in the demonstration path) that nationally, 2,000 ha of land will be converted to horticulture per year from 2025 and notes that the Commission expect this could increase if "barriers – such as water availability, labour, supply chains and path to market – are addressed". Opening more opportunities for conversion to lower emissions production systems and land uses, including horticulture, is listed as a critical outcome. The advice also notes that further land use change from livestock agriculture into horticulture and forestry (from 2021, additional 3,500 ha per year converted from dairy) would be required to meet the more ambitious end of the 2050 methane target if new technology does not come through.

Opportunities such as diversification of land use to horticultural subsets such as orcharding need to be elevated and included as the opportunity for the SRS to plan for.

4.4.4. PRINCIPLE 2D: SUPPORT A STRONG RURAL ECONOMY

The rural economy in Auckland contributes 0.03% of the total GDP[27]; however, Auckland Council needs to consider not only the monetary value of an activity, but the national significance. 80% of all vegetables grown in New Zealand are for the domestic market, this means they are destined for tables in New Zealand households. The majority of vegetables are grown in Pukekohe, Horowhenua and Canterbury, with Pukekohe being the largest production region by volume[28].

The challenge for Auckland Council in the SRS is how to provide for a strong rural economy when most of the economic activity is generated within the Auckland City. Vegetable growing is a small significant part of the economy that impacts all New Zealanders. As New Zealand is geographically isolated, this means there is limited ability to import the volume and variety required to meet our population's needs[29]. Furthermore, commercial vegetable growing typically operates with smaller profit margins and on the fringes of larger urban centres, meaning there is increased competition for resources, land availability, and need for infrastructure to support the rural production activities.

While the NPS HPL provides protection for highly productive land, it falls short of enabling the productivity of that land by providing for key inputs such as freshwater. The recent amendments to the NPS HPL make it clear that greenhouse developments are appropriate activities on highly productive land. In the SRS area there is a considerable greenhouse industry with many greenhouse operations needing to consider replacement of older greenhouse infrastructure or how to expand. A significant proportion of greenhouse activity is in the Future Urban Zone. One way the SRS can assist with

[26] Ināia tonu nei: a low emissions future for Aotearoa » Climate Change Commission (climatecommission.govt.nz)
[27] Which industries contributed to your region's GDP? | Stats NZ
[28] NZIER-report-Making-the-economic-case-for-vegetable-production-in-NZ-FINAL.pdf
[29] NZIER-report-Making-the-economic-case-for-vegetable-production-in-NZ-FINAL.pdf

supporting a diverse range of industry in the area is to provide direction on where and how these activities can be provided for. Auckland Council have a development contribution policy that excludes greenhouses. This is a deliberate policy approach to attract and retain this regionally significant activity. This is a strategy that should be carried forward to support diverse rural production in the future.

4.5. Spatial response

HortNZ is concerned that the spatial response does not reflect the intent of the principles outlined in the SRS.

The SRS is a document that sits within the Auckland Future Development Strategy and should primarily be focused on ensuring production is supported and enabled in rural areas.

The Auckland FDS covers a large area, much of which has better opportunity for providing for extra population growth. HortNZ is concerned that intensification at the rural urban boundary will result in reverse sensitivity issues and prevent growers from being able to make use of productive land.

Of note, HortNZ is also concerned that other planning processes and approaches, such as those signalled in the NPSFM planning documents relating to riparian planting and erosion and sediment control, will further erode and undermine the productivity of the Southern Rural Production Area. HortNZ does not believe there is adequate consideration by Auckland Council about the total impact of decisions made in different plans and policies are having cumulatively on the productivity of the region.

Regionally, Auckland has many other areas that can support further intensification that are not centred in the key rural production areas.

4.5.1. PUKEKOHE AND WAIUKU

Pukekohe is a rural support hub, and it is the heart of the horticultural and rural production area supporting the rural area. It is critical that good transport networks support growers to get fresh produce from the farm and post-harvest facilities to market. Fresh produce has a short shelf-life and the majority of distribution centres, including the port are based in Auckland City.

It is important the SRS enables supporting activities, such as post-harvest facilities and efficient transport to support rural production.

HortNZ is also concerned that any increases in population will cause further competition and challenges for rural production to access key inputs, such as freshwater to enable production.