

SUBMISSION ON

Updated Future Proof Strategy 2024 - 2054

19 February 2024

To: Waikato Regional Council

Name of Submitter: Horticulture New Zealand

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OVERVIEW

Submission structure

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Our submission

Horticulture New Zealand (HortNZ) thanks Waikato Regional Council for the opportunity to submit on the Updated Future Proof Strategy and welcomes any opportunity to continue to work with Waikato Regional Council and to discuss our submission.

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

HortNZ wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

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.



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.



Submission

1. Horticulture in Waikato

The Waikato Region has long-been an important part of the national food production system. Research into pre-European Māori gardening practices have supported the long history of cultivation in contemporary production hubs such as the Waikato and Pukekohe areas, with evidence of soil modification such as the extraction of gravels and sand from below the soil surface to improve soils for certain crops.¹

There are significant areas of horticulture within the sub-region covered by the Future Proof Strategy. This is regionally and nationally significant in the domestic food production system. There are large pockets of high-class soils (as defined in the Waikato Regional Policy Statement) / Highly Productive Land (as defined in the National Policy Statement for Highly Productive Land 2022), strategically placed near the Auckland and Hamilton markets.

There are more than 6,116ha of horticultural activity in the Waikato region (predominantly vegetables); the most abundant crops include onion, potatoes, carrots, broccoli (and other vegetables), asparagus, berryfruit and kiwifruit.² Based on 2014 figures, the Waikato region produced 32% of the country's onions, 28% of tomatoes and 19% of potatoes.³

Agricultural Production Census 2017 data reported that there were 4,035 hectares of 'horticultural land and land prepared for horticulture' in the sub-region:

- 3466 ha in Waikato District
- 844 ha in Waipa District
- 25 ha in Hamilton City.⁴

There is a significant area of vegetable growing around Tuakau and Pokeno - extending from the boundary with the Auckland region, and south of the Waikato River. This is part of the area termed the 'Pukekohe Hub'. Vegetables and fruit crops are also grown elsewhere throughout the sub-region.

There are locational reasons why the rural sector is so productive in Northern Waikato related not just to the quality of soil but also access to freshwater, transport linkages, post-harvest facilities, access to labour, the proximity of the market and a diverse land parcel structure.

¹ Furey, L (2006). *Maori gardening: an archeological perspective*. Department of Conservation retrieved: [Maori Gardening: An archaeological perspective - Louise Furey \(doc.govt.nz\)](https://www.doc.govt.nz/doc.govt.nz/publications/maori-gardening-an-archaeological-perspective)

² Freshfacts, 2020 (<https://www.freshfacts.co.nz/files/freshfacts-2020.pdf>)

³ <http://www.hortnz.co.nz/assets/Media-Release-Photos/HortNZ-Report-Final-A4-Single-Pages.pdf>

⁴ Agricultural Production Census 2017 Final Results by Territorial Authority. Statistics New Zealand.

Pukekohe Hub

The Pukekohe Hub straddles the Auckland Region and Waikato District boundaries; a significant portion including Tuakau, Pokeno, Aka Aka, Te Kohanga, Onewhero and Pukewaka is located within north Waikato. HortNZ commissioned Deloitte to undertake an analysis of the contribution of the 'Pukekohe Hub', this report⁵ found that:

- The Hub's horticulture industry directly contributes approximately \$86 million per annum, in value-added terms, to the regional economy.
- The Hub's horticulture industries indirect contribution, reflecting expenditure on intermediate inputs such as agriculture support services, water, machinery, feed, fertiliser and seed, is \$175 million per annum, in value-added terms.
- The Hub employs 3,090 full time equivalents, and 90% of the produce grown in the Hub is for the domestic market.
- The Hub contributes to the social fabric of the community.

2. Horticulture and horticulture needs

2.1. Land use, water and horticulture needs

It is the view of HortNZ and growers that the Future Proof Strategy (FPS) is an opportunity for Waikato Regional Council to work closer with the horticultural community and industry to create a plan that enables production activities to occur while providing for population growth and development.

Growers have been making progress on the uptake of good practices - particularly in the Pukekohe catchment⁶ where HortNZ has been actively supporting growers prepare for Freshwater Farm Plans (FWFP)⁷. The practice adoption has been tracked through HortNZ's Growing Changes project and has been highlighted throughout the current Plan Change 1 process. HortNZ believe FWFP and the use of industry programmes to support the uptake of Best Management Practices will be fundamental to achieving improvements in environmental outcomes.

Freshwater use and access is important to consider in the context of the FPS as short rotational cropping is dynamic in both use of water and location. 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.

⁵ New Zealand's Food Story. The Pukekohe Hub. Deloitte. 2018.

<https://www.hortnz.co.nz/assets/Environment/National-Env-Policy/JR-Reference-Documents-/Deloitte-Pukekohe-Food-Story-Final-Report.pdf>

⁶ [Fresh produce and freshwater \(arcgis.com\)](#)

⁷ [Freshwater Farm Plans | Horticulture New Zealand – Ahumāra Kai Aotearoa \(hortnz.co.nz\)](#)

2.1.1. 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.⁸ 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.⁹

2.1.2. POST-HARVEST WATER REQUIREMENTS

Growers need to work within food safety and market requirements to ensure produce is safe and fit for human consumption.¹⁰ 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 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.

2.1.3. NATIONAL POLICY STATEMENT FOR HIGHLY PRODUCTIVE LAND

The National Policy Statement for Highly Productive Land (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 NPS HPL raises some questions about certain types of primary production and where to locate these. The NPS HPL directs intensive primary production activities such as soil-less production of greenhouse crops away from LUC 1, 2 or 3 land, however Ministry for the Environment guidance on the NPS is clear that these activities must be planned and provided for^{11,12}. The complexity for a greenhouse operation is that it requires access to the same markets, transport route and horticultural support services as a traditional soil-based operation. Growers planning for the future may 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.¹³ There

⁸ [CHAPTER 2: CROP WATER NEEDS \(fao.org\)](#)

⁹ [Importance of Crop Rotation \(bayer.com\)](#)

¹⁰ [2019-07-24-Guidelines-for-Fresh-Produce-Food-Safety-2019-WEB.pdf \(hortnz.co.nz\)](#)

¹¹ [National Policy Statement for Highly Productive Land | Ministry for the Environment](#)

¹² [National-Policy-Statement-Highly-Productive-Land-Guide-to-implementation-March-2023.pdf \(environment.govt.nz\)](#)

¹³ [LeaderBrand | Grow Regions](#)

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.

2.1.4. NATIONAL DIRECTION AND SUPPORT FOR HORTICULTURE

The NPS HPL provides a clear direction about how to protect Highly Productive Land for land-based primary production. The NPS HPL 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.¹⁴ While this legislation has been repealed, the recognition of the vulnerability to our domestic food supply and the role of horticulture being recognised as critical for supporting the health and 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 2035.¹⁵ 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 post-election transition, 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 Future Proof Strategy will inform other planning documents and have a direct impact on land use.

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 low emissions economy; and
- Regional growth and development: how we feed the growing population and support populations through employment opportunities.

The FPS needs to provide structure and guidance on how regions will grow and where urban and housing development will occur. There needs to be balance between development of land and production on the land to support the population. The FPS needs to balance the NPS UD with the NPS HPL to ensure production and urban development are considered together.

¹⁴ [404 Not Found - New Zealand Parliament \(www.parliament.nz\)](http://www.parliament.nz)

¹⁵ [Growing together 2035 - Aotearoa Horticulture Action Plan \(February 2023\) \(mpi.govt.nz\)](https://mpi.govt.nz/growing-together-2035-aotearoa-horticulture-action-plan-february-2023/)

Land is a finite natural resource that needs to be managed to meet the needs of people now and those of future generations. In our view, 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.

Policies to manage ad-hoc urban and lifestyle development are essential to maintain 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 HPL that was unavailable for horticulture because it had a house on it increased by 54% from 2002 to 2019.¹⁶

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 returned 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.

The Waikato Regional Policy Statement development principles states that new development should be directed away from high class soils and primary production on those high class soils.

HortNZ has been an active participant in the Proposed Waikato District Plan. Through that process it was evident that decisions made under the current Future Proof Strategy had cut across the values of highly productive land and rezoned nationally significant primary production land around Tuakau for urban use.

More recently decisions on Proposed Waikato Regional Policy Statement Change 1 (National Policy Statement on Urban Development and Future Proof Strategy Update) were released. Through that decision, the NPS HPL has been reflected in changes to the WRPS.

HortNZ do not consider it acceptable to continue to support the loss of highly productive land to urban use in the Waikato 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.

¹⁶ Our Land 2021. Ministry for the Environment.

3. Comments on the Updated Future Development Strategy

3.1. Section A - Background and context

A3. GUIDING PRINCIPLES

There is confusion in the updated Future Growth Strategy regarding the value of Highly Productive Land and how this is reflected in the guiding principles. The NPS HPL is clear on the definition of Highly Productive Land being all LUC 1, 2, 3 land. LUC 1, 2 and 3 is a nationally significant resource, hence the gazettal of a National Policy Statement in 2022. This signals a need for caution on how this resource is managed and planned for.

The updated Future Growth Strategy makes a distinction of LUC 1 (Waahi toitu) from LUC 2, & 3) Waahi toiora. At present, from a regulatory context, we look to the Waikato Regional Policy Statement (WRPS) which treats LUC 1, 2 and 3 as a single entity. If the updated Future Growth Strategy is confirmed as proposed, then there will be an inconsistency with the NPS HPL and WRPS that will create challenges in implementation now and likely dictate a redrafting of the WRPS in the future.

The updated Future Growth Strategy states in 3.1 an intent (in the context of protection of the natural environment), to protect waahi toitu (LUC 1) and allow development on waahi toiora (LUC 2 & 3). However, 6.1 (in the context of Emission Reduction & Climate Change), states an intent to protect highly productive land (LUC 1, 2 & 3) for highly productive farming from rural lifestyle and encourage a compact urban form. HortNZ suggest that a review of the guiding principles should consider how perspectives have changed or developed in recent times and a better structure to this section address the above conflict and recognition of other related matters.

A matter of note is the regional, national and international recognition of food security. The global pandemic has highlighted the importance of New Zealand's domestic food production system and its ability to feed New Zealanders, our Pacific Island whanau and other countries.

Prior to Covid-19, projections around New Zealand's expected population increase and annual food volumes available for consumption in New Zealand show that domestic vegetable supply will not be able to sustain our future population consumption needs.¹⁷

Already many New Zealanders, are struggling to meet the recommended daily intake of 3+ vegetables and 2+ fruits a day. In 2018/2019, only 33.5% percent of New Zealand adults and 49.9 percent of children met the recommended daily fruit and vegetable intake. Reasonably priced, healthy food is essential for human health.¹⁸

While supportive of the principles addressing affordable & sustainable resource use, HortNZ consider the principles and FPS would be improved through explicit recognition

¹⁷ Horticulture New Zealand. (2017). [New Zealand domestic vegetable production: the growing story.](#)

¹⁸ https://minhealthnz.shinyapps.io/nz-health-survey-2019-20-annual-data-explorer/#/w_869093ed/#!/explore-topics

of food security. The provision of food security sitting aside housing and water as essential for human health.

Furthermore the 6.1 as proposed is an uncomfortable fit under the heading 6 Emission Reduction & Climate Resilience. The purpose of the NPS HPL as per Objective 2.1 differs from that expressed in this strategy through this guiding principle.

Outcome sought:

Add new guiding principles as follows:

Food Security

1. Protect highly productive land for land-based primary production by avoiding rural lifestyle and urban rezoning except as provided in the NPSHPL.
2. Food production, food supply and food security relate to essential human health needs which are to be provided for through the allocation and sustainable management of natural and physical resources.
3. Enable and encourage land use change to lower emission food production systems.

A4. CONTEXT

The context rightly identifies the relevance of the NPS HPL and implications for the strategy but in linking to a strategy that embodied protecting waahi toituu (LUC 1) and allowing development on waahi toiora (LUC 2 & 3) is inconsistent with the National Policy Statement.

A5. CHALLENGES AND OPPORTUNITIES

Climate change and ongoing environmental deterioration

The discussion under this section refers to a need to better preserve high-quality soils. It is not clear what the relationship is to climate change, except possibly soil erosion. As a section covering both challenges and opportunities, the strategy would benefit by discussing the opportunities land use change might bring.

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.¹⁹ 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 -

¹⁹ [Ināia tonu nei: a low emissions future for Aotearoa » Climate Change Commission \(climatecommission.govt.nz\)](https://climatecommission.govt.nz/ināia-tonu-nei-a-low-emissions-future-for-aotearoa)

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.

Outcome sought:

Amend Climate Change and Ongoing Environmental Deterioration to discuss the positive outcomes that can occur via a transition to low emissions food production activity. This is not a solution to the issue of climate change but a positive contribution to mitigating the effects.

3.2. SECTION B - Our growth management approach

B1. OVERVIEW

The overview statement of a compact and concentrated settlement pattern approach is supported but would be improved by noting that a benefit is in access to rural resources.

Outcome sought:

Amend Compact and Concentrated as follows:

The benefits of a compact and concentrated approach to growth and development include greater productivity and economic growth, better use of existing infrastructure, improved transport outcomes, enhanced environmental outcomes, greater social and cultural vitality, more opportunities for place-making and community connectedness, regeneration of existing urban areas, and preservation of the rural environment natural environment (as per the principles) and ~~enablement of sustainable rural resource access to rural resources.~~

B2. TANGATA WHENUA

HortNZ supports an approach which is enabling of mana whenua as they continue on their post-settlement development journeys. HortNZ is mindful that the FPS should not have any unintended consequences that limit the ability of mana whenua to utilise land resources for production purposes.

HortNZ would like to acknowledge the long history of production in Waikato that has been one of the key commodities that supported the pre-colonisation economy of trade

across Aotearoa.²⁰ Horticulture has been an essential part of the Waikato identity as long as there has been settlement in the area.

B3. WAAHI TOITUU AND WAAHI TOIORA

HortNZ strongly opposes the distinction made in the strategy to separate LUC 1 from LUC 2 and 3 soils for the purposes of a growth strategy. There is no policy basis for this in the existing Waikato District, Waikato Regional or national planning frameworks. Furthermore, the approach is directly contrary to the Waikato Regional Policy Statement which considers by definition and policy that NPS HPL.

The Future Proof Growth Strategy has deliberately, and outside of a Resource Management Act Schedule 1 process, defined a hierarchy of Highly Productive Land without policy or scientific evidence. This has been done to enable a growth management agenda that would compromise regionally and nationally significant rural production land. HortNZ is highly concerned with this agenda and the suggestion that this strategy will then inform changes to the Regional Policy Statement and thereby lower order planning documents.

For the horticultural food production sector there is no distinction between LUC classes 1, 2 and 3 in terms of its critical need to support the production system. As much food is produced on LUC classes 2 and 3 as class 1.

In the case of commercial vegetable production, the activity operates a rotational system across LUC classes 1, 2 and 3 that is necessary for sustaining soil health and productivity. We provide the following analysis of short rotation cropland highlighting that the majority of this land is LUC classes 2 and 3. If this land is put into alternative use (urban, rural lifestyle) then food cannot be produced.

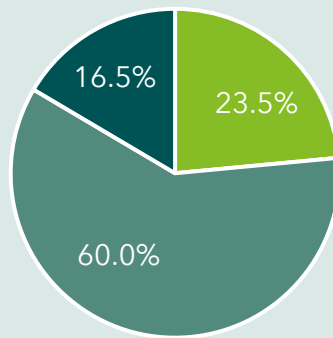
ANALYSIS OF EXISTING CROP LAND ACROSS LUC 1, 2 AND 3

Appendix A includes an analysis of the area of short rotation cropland data (Land Cover Database version 5.0) as a proxy for existing vegetable growing land in the sub-region across LUC classes 1, 2 and 3.

This indicated that in the sub-region, of the approximately 7,500 hectares of short rotation crop land on LUC 1-3 land, the majority of this (76.5%) is located on LUC classes 2 and 3 (refer to figure below).

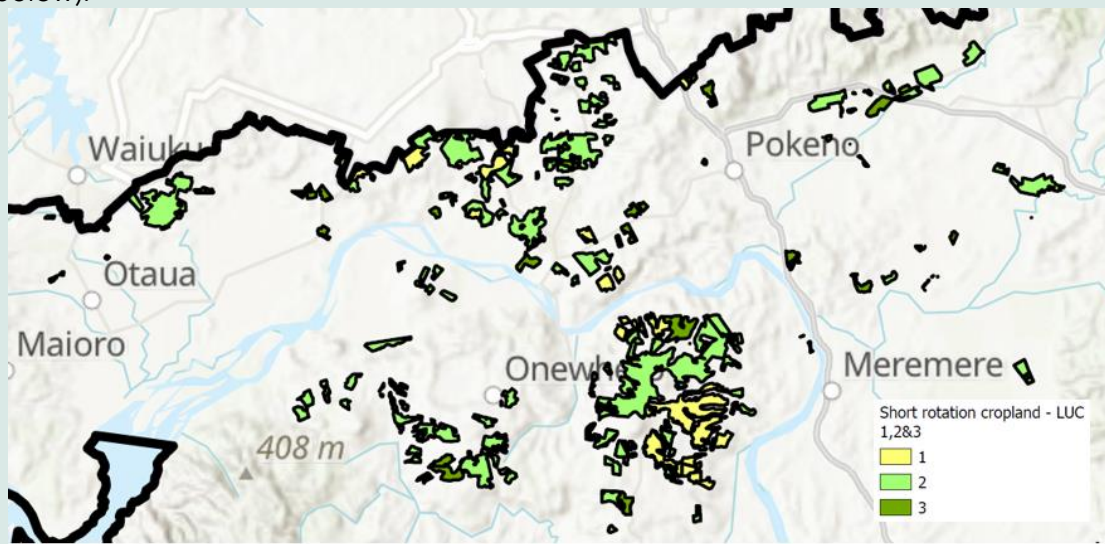
²⁰ Furey, L. (2006) [Maori Gardening: An archaeological perspective - Louise Furey \(doc.govt.nz\)](#)

Short rotation crop land - % on LUC 1, 2 and 3



■ LUC 1 ■ LUC 2 ■ LUC 3

The bulk of the existing vegetable growing land in the sub-region is within the Waikato District (part of this being part of the 'Pukekohe Hub'). Within this district, 19.7% of short rotation crop land is located on LUC 1, 62.6% on LUC2 and 17.8% on LUC 3 (as shown below).



HortNZ opposes the approach that has been taken to Waahi Toituu and Waahi Toiora in respect of highly productive land being reclassified/separated out as proposed.

Outcome sought:

That there be no reclassification of Highly Productive Land in a manner inconsistent with district, regional and national policy and that the same protectionist principles are applied to LUC 1, 2 and 3, that avoids inappropriate subdivision, use and development (including rural lifestyle use and urban expansion) on this scarce resource.

Alignment of the FPS with the NPS HPL.

B4. RESPONDING TO CLIMATE CHANGE

Climate change is both a national and global challenge. Many communities are considering what climate change impacts will mean for them. It is important to note that climate change will have an impact on the types of activities that may be suited to an area, both presenting challenges and opportunities.

Research has illustrated the connection between eating patterns, climate change and health outcomes, eating more plant-based foods and minimising food waste were one of the most important ways individuals could reduce their personal climate footprint while also having health gains and health system savings²¹. This research reported annual diet-related emissions reductions of between 4 percent (following NZ dietary guidelines) to 42 percent (waste-free vegan diet), the latter being equivalent to one-fifth of the current emissions reduction needed to meet New Zealand's commitment under the Paris Climate Agreement.

There is a need to actively consider how an increase in horticultural production can support and overall increase in fresh fruit and vegetable consumption and help meet New Zealand's climate change goals. The Waikato region has a high proportion of LUC 1, 2 and 3 land predominantly located from North of Te Kuiti up to Waiuku²², including the nationally significant Pukekohe vegetable production area²³. While there are changes to climate anticipated, the land use class of areas of land will remain the same.

The Aotearoa Horticulture Action Plan (AHAP) seeks to provide a framework to grow the value of the horticulture industry to \$12 billion by 2035.²⁴ The AHAP has been developed in collaboration with government, industry and growers. A critical outcome area of the AHAP is to grow sustainably and the plan has emphasis on both sustainability and climate change mitigation. The AHAP has built on previous efforts, including 'fit for a better world' plan is to support a transition to a low-emissions economy and growing the value of the horticulture industry.

A reduction in carbon emissions is one aspect of planning for climate change, the other aspect is looking for opportunity and supporting the transition needed to achieve overall climate change adaptation. Areas of land that may be deemed unsuitable for housing development due to the risks of climate change, may still be suitable for other production purposes. This could be for short-rotational cropping, or orcharding for example.

There is a need to ensure roadways and transport routes are suitable for the transportation of fresh produce to population centres, markets and distribution hubs. When considering how to increase walking, cycling and micro mobility, also consider how the basic human health needs, such as fresh produce, will be transported and made available to local populations.

²¹ [Healthy and Climate-Friendly Eating Patterns in the New Zealand Context | Environmental Health Perspectives | Vol. 128, No. 1 \(nih.gov\)](#)

²² [Land Use Capability » Maps » Our Environment \(scinfo.org.nz\)](#)

²³ [Pukekohe Hub | Deloitte New Zealand](#)

²⁴ [Growing together 2035 - Aotearoa Horticulture Action Plan \(February 2023\) \(mpi.govt.nz\)](#)

Outcome sought:

That Directive 4.1 is retained, and amended to include reference to all LUC 1, 2 and 3 land (Waahi Toituu and Waahi Toiora).

Support the inclusion of reference to enabling and creating sensible network to support the transportation of goods and produce from rural production areas into main population centres and distribution hubs.

Alignment of the FPS with the NPS HPL.

B7. CURRENT AND FUTURE GROWTH AREAS

The section lists a series of Growth Management Directives. Missing from the fourteen directives are any reference to avoiding highly productive land (or high-class soils) consistent with the Waikato Regional Policy Statement and the NPS HPL. Furthermore, the approach is inconsistent with section 9 of the strategy.

Directive 7.12 speaks to the need to manage reverse sensitivity conflicts. Reverse sensitivity is a major issue for growers and other rural production industries, felt most keenly at the rural-urban boundary interface, or where there is rural lifestyle development into production areas, where the conflict between production activities and urban lifestyle activities is most apparent. HortNZ believes planning and growth decisions need to take into account the increased issues to the rural production zone when the urban boundary is intensified, increasing the number of properties bordering the rural zones. There needs to be clear direction to enable production activities are prioritised to continue in the rural zone.

Outcome sought:

Add growth management directive to avoid urban development across highly productive land.

Amend 7.12 to include reference to enabling primary production activities

B8. GROWING A PROSPEROUS ECONOMY

The horticulture sector is a growing industry. With many strategies, plans and documents to support the continued growth and aspiration of doubling the value of the industry by 2035²⁵. Further to this horticulture is seen as one opportunity to support the economy, populations and work towards New Zealand’s climate change aspirations²⁶. Climate change and our changing populations present both challenges and opportunities that the horticulture sector is well-positioned to provide solutions for.

In addition to direct employment, there is opportunities for employment at many different skill levels - both on farm and in supporting industries. Opportunities for the

²⁵ [Aotearoa Horticulture Action Plan | Horticulture New Zealand – Ahumāra Kai Aotearoa \(hortnz.co.nz\)](#)

²⁶ [Economy and financial system | Ministry for the Environment](#)

economy in Waikato are wider than development of cities and can work within the existing rural character and environment of the Waikato area.

Outcome sought:

Include a directive to support and provide opportunities for horticultural development in line with national objectives and climate change adaptation.

B9. RURAL AREAS

Support recognition of the importance of the sub-region for food production and food security.

Outcome sought:

Amend introduction to elevate the importance of the sub-region for food production and food security as follows:

Highly Productive Land is protected for their productive potential including food production in recognition of the sub-region’s role in domestic food security and exports.

The growth management approach and specified directives require amending so that there be no reclassification of highly productive land in a manner inconsistent with district, regional and national policy and that the same protectionist principles are applied to LUC 1, 2 and 3 that avoids inappropriate subdivision, use and development (including rural lifestyle use and urban expansion) on this scarce resource.

The relevance of the National Policy Statement for Highly Productive Land for regional growth management needs to be acknowledged and consistent language reflected in the rural areas growth management directives in this section.

3.3. SECTION D - Implementing the Strategy and Settlement Pattern

D3. MONITORING AND REVIEW

Outcome sought:

Add new Key Performance Indicators for the rural environment including a specific indicator that considers the impacts on and loss of the finite and scarce sub-regional Highly Productive Land.

3.4. SECTION E - Appendices

HortNZ is significantly concerned with the existing interpretation of the WRPS by the Future Growth Strategy regarding Highly Productive Land and a suggestion that this strategy might then inform changes to the WRPS. Changes to reclassify the definition of Highly Productive Land or the suggestion that LUC 2 and 3 have a lower food production value than LUC 1 is wholly opposed by HortNZ and not evidence based.

E3. GLOSSARY

Outcome sought:

Delete references to LUC 1, 2 and 3 from Waahi toituu and Waahi toiora.

Include definition of Highly Productive Land.

Development a strategy that gives effect to the NPS HPL

Appendix A

Analysis of Short Rotation Cropland Across LUC 1, 2, 3

Sub-region (Waikato, Waipa and Hamilton City districts)

LUC	Hectares	Percentage (%)
LUC 1	1777.5	23.5
LUC 2	4545.4	60.0
LUC 3	1253.4	16.5
	7576.3	100.0

By territorial authority

Territorial Authority	LUC Class	Hectares	Percentage (%)
Hamilton City	1	30.4	39.3
	2	47.0	60.7
Waikato District	1	1286.4	19.7
	2	4092.1	62.6
	3	1161.4	17.8
Waipa District	1	460.6	48.0
	2	406.3	42.4
	3	92.0	9.6

Please see below - map of Short Rotational Crop-land LUC 1, 2 & 3 Waikato, Waipā and Hamilton City.

