

UPDATED FUTURE PROOF STRATEGY - Submission Form



The Future Proof Strategy is a 30 year growth management and implementation plan for the Hamilton, Waipa and Waikato sub-region. The Strategy is essential to managing growth in a staged and co-ordinated way while addressing complex, cross-boundary planning issues.

The Future Proof Strategy has been updated and public feedback is now being sought. This submission form seeks to capture your feedback so it can be considered before Strategy is finalised. All submissions must be received by 5pm (Friday) November 12, 2021

Have your say

This submission form enables you to have your say on the updated Future Proof Strategy. You can make a submission by:

- Using this online form
- Downloading a hard copy of this form and posting it:
Attn Future Proof, Waikato Regional Council, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
- Emailing this form: futureproofcoordinator@waikatoregion.govt.nz

Your details (please complete):

Full name: _____

Name of organisation (if applicable): _____

Street address: _____

Phone: _____ Email: _____

Your feedback:

1. Future Proof vision

Does the vision outlined on page 17 of the Strategy describe the sort of communities we want for ourselves and future generations? Do the Guiding Principles (pages 18-19 of the Strategy) reflect what is important to you as we plan for the future of the sub-region?

2. Growth management

Do you support the transformational moves (see pages 36-37 of the Strategy) and will they help us to realise the vision of our communities?

3. Implementation programme

Will our implementation plan (see pages 97-109 of the Strategy) help us achieve the Future Proof Strategy vision? What, if anything, is missing?

4. Please add in any further comments you wish to make

Are you happy for your name and/or the name of your organisation to be released to the public in association with this submission? (tick one)

☐ Yes

☐ No

Do you wish to speak to your submission? Hearings are likely to be held in December 2021 in Hamilton.

☐ Yes I wish to be heard.

☐ No I do not wish to be heard.

All submissions must be received by 5pm, (Friday) November 12 2021

PRIVACY STATEMENT:

Submissions under the Local Government Act 2002 are public documents. They are made available in reports to the Future Proof Implementation Committee and to members of the public on request. Personal information will be used for administration purposes and as part of the consultation process. You have the right to correct any errors in personal details contained in your submission.

SUBMISSION

SUBMISSION ON
Updated Future Proof
Strategy

12 November 2021

To: Future Proof Implementation Committee

Name of Submitter: Horticulture New Zealand

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OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: HortNZ's submission on the Updated Future Proof Strategy

Our submission

Horticulture New Zealand (HortNZ) thanks the Future Proof sub-committee for the opportunity to submit on the Updated Future Proof Strategy and welcome any opportunity to discuss our submission further.

HortNZ wish to speak to this submission.

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 6000 commercial fruit and vegetable growers in New Zealand, who grow around 100 different crop types and employ over 60,000 workers.

There is approximately 120,000 hectares of horticultural land in New Zealand - approximately 80,000 ha of this is fruit and vegetables. The remaining 40,000 ha is primarily made up of wine grapes and hops, which HortNZ does not represent.

It is not just the economic benefits associated with horticultural production that are important. The rural economy supports rural communities and rural production defines much of the rural landscape. Food production values provide a platform for long term sustainability of communities, through the provision of food security.

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 the sub-region

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) strategically placed near the Auckland and Hamilton markets.

There is 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.¹ Based on 2014 figures, the Waikato region produced 32% of the country's onions, 28% of tomatoes and 19% of potatoes².

Agricultural Production Census 2017 data reported that there was 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.³

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.

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 report found that:⁴

- 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

¹ Freshfacts, 2020 (<https://www.freshfacts.co.nz/files/freshfacts-2020.pdf>)

² <http://www.hortnz.co.nz/assets/Media-Release-Photos/HortNZ-Report-Final-A4-Single-Pages.pdf>

³ Agricultural Production Census 2017 Final Results by Territorial Authority. Statistics New Zealand.

⁴ 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>

- The Hub contributes to the social fabric of the community

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.

1.1. Key issues for horticulture

1.2. Future proofing food security

Food security is a nationally important issue which needs to be addressed at a strategic level, it is integral to human health.

Growing of vegetables for domestic supply is integrated with vegetables grown for export in crop rotations. We also 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. Fruit and vegetables are essential for the human health of New Zealanders.

Regulatory pressure is preventing the expansion of vegetable growing from keeping up with population growth. This is predicted to result in increased cost for consumers, with tangible health consequences.

Health costs of increases in vegetable process

Otago University has recently modelled the potential health impacts of increased vegetable prices. This study found that using the health costs of an increase in vegetable prices of 43 - 58 percent, (Deloitte, 2018) would be a loss of 58,300 - 72,800 Quality Adjusted Life Years and health costs of \$490 - \$610 million across the population.⁵

Along with providing for existing areas of horticulture (and continuing to enable their ongoing productive use), it is also important to protect the opportunity for commercial vegetable production on new sites. This requires suitable soils and climate conditions.

For example, the decision version of Waikato Regional Plan Change 1 specifically provides an opportunity to increase commercial vegetable growing (up to a maximum area) in defined sub-catchments on LUC 1 and 2 soils. This was provided for food security and responding to population growth and land lost to urban development. These sub-catchments are located in the Central Waikato, Lower Waikato and Waipa FMU.

Many fruit crops are also grown mainly for the domestic supply. It is important to retain access to suitable soils for horticulture.

1.3. Highly productive land

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.

⁵ <https://www.hortnz.co.nz/assets/Environment/Reports-research/The-health-and-health-system-cost-impacts-of-increasing-vegetables-prices-over-time.pdf>

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 2019.⁶

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. There is a limited supply of high class soil.

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.

The draft National Policy Statement for Highly Productive Land signals the intent to elevate the importance of high-quality rural production land, such as that found in Waikato, at a national, regional and local level.

HortNZ has recently 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. 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 being promulgated and other options are available to address urban growth needs. The food security of the region and nation should not be compromised.

1.4. Climate change adaption and mitigation

In the context of greenhouse gas emissions reduction targets, the Paris Agreement highlights the importance of food production and food security, recognising the “*fundamental priority of safeguarding food security ...*” and noting the need to adapt and foster resilience and lower emissions, in a manner that does not threaten

⁶ Our Land 2021. Ministry for the Environment.

Horticulture, and in particular fruit for export, presents an opportunity for current and future generations to produce more food in New Zealand with much lower emissions than animal agriculture.

2. Comments on the updated Future Proof Strategy

2.1. SECTION A – Background and context

GUIDING PRINCIPLES

HortNZ suggest that a review of the guiding principles should consider how perspectives have changed or developed in recent times. 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.⁷

Already many New Zealanders, are struggling to meet the recommended daily intake of 3 plus vegetables and 2 plus fruit 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.⁸

While supportive of the amendments/new principles addressing Sustainable Resource Use and Climate Resilience, HortNZ consider the principles and Future Growth Strategy would be improved through explicit recognition of food security.

Outcome sought:

Add as follows:

6 Sustainable Resource Use and Climate Resilience

Food production, food supply and food security relate to essential human health needs which are to be provided for through sustainable resource management.

CONTEXT

Figure 8 and the following context discussion identifies the relationship between the Future Proof Strategy and key documents. Government initiatives are listed but excluded is the progression of a National Policy Statement for Highly Productive Land. As advised by the Government, final decisions on the proposed NPS-HPL will be made by ministers and Cabinet in the first half of 2022. If approved by Cabinet, the proposal would likely take effect in the first half of 2022.⁹

Outcome sought:

Amend Figure 8 and add context discussion on the Government Initiative for a NPS-HPL.

⁷ Horticulture New Zealand. (2017). [New Zealand domestic vegetable production: the growing story.](https://minhealthnz.shinyapps.io/nz-health-survey-2019-20-annual-data-explorer/)

⁸ <https://minhealthnz.shinyapps.io/nz-health-survey-2019-20-annual-data-explorer/?w=869093ed#!explore-topics>

⁹ <https://environment.govt.nz/acts-and-regulations/national-policy-statements/proposed-nps-highly-productive-land/>

2.2. SECTION B - Our growth management approach

SECTION 1. OVERVIEW

The overview statement of a Compact and Concentrated settlement pattern approach is supported but would be improved by noting that a benefit is not the 'preservation' of the rural environment, but protection of the natural environment (as per the principles) and enablement of sustainable rural resource.

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.

SECTION 3. WAAHI TOITUU AND WAAHI TOIORA

HortNZ strongly opposes the distinction made in the strategy to separate LUC 1 from LUC 2 and 3 soils and to reclassify these as Elite (1) and Prime (2 and 3) for the purposes of a growth strategy. There is no policy basis for this in 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 all LUC1, 2 and 3 (Ille1 and e5) are high class soils and highly productive) and the progress of the National Policy Statement. The approach also conflicts with section 9 of the strategy.

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 that will enable a growth that would compromise regionally and nationally significant rural production land. HortNZ is highly concerned with this approach 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.

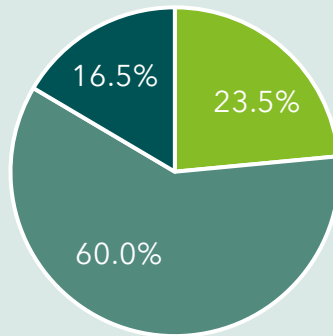
In the case of commercial vegetable production the activity operates a rotational system across LUC classes 1, 2 and 3 that is necessary for sustaining soil health and productivity. We provide the following analysis of short rotation cropland highlighting that the majority of this land is LUC classes 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.

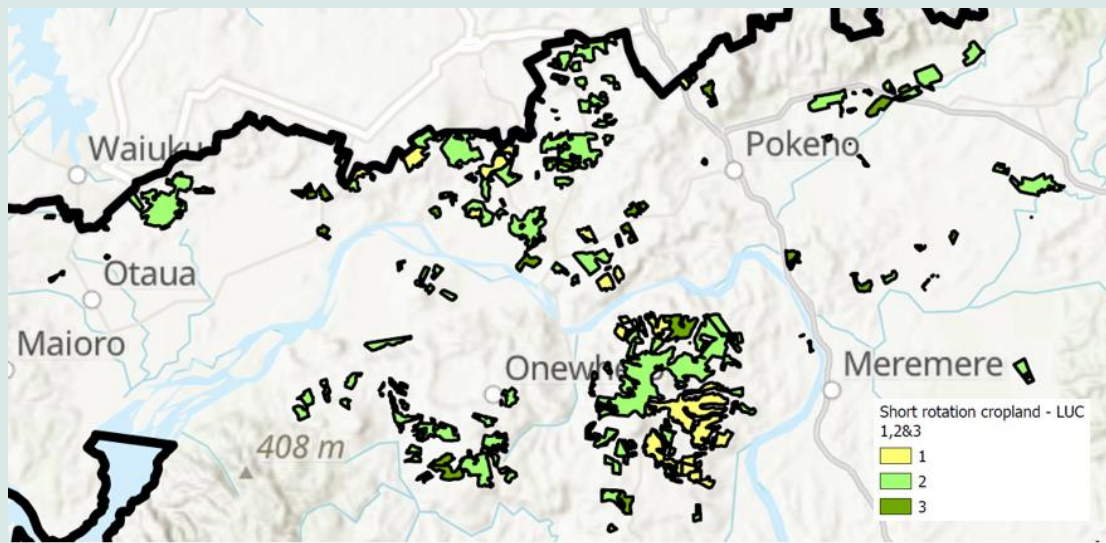
This indicated that in the sub-region, of the approximately 7,500 hectares of short rotation crop land on LUC 1-3 land, the majority of this (76.5%) is located on LUC classes 2 and 3 (refer to figure below).

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 (on LUC 1-3) 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.

SECTION 7. CURRENT AND FUTURE GROWTH AREAS

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

Map 8 identifies possible future urban encroachment areas for further investigation. To the west of Tuakau a substantive area of 'possible future urban enablement area for further investigation or other decisions' is identified. That area is known highly productive land. The area is also identified in the 'Pukekohe Hub'. HortNZ oppose the identification of this area in this context.

Outcome sought:

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

Remove from Map 8 the area west of Tuakau identified as 'possible future urban enablement area for further investigation or other decisions'.

SECTION 9. RURAL AREAS

The introduction has a focus on economic matters and would be improved by noting the importance of the sub-region for food production and food security.

While supportive of the background discussion, the text fails to link the sub-regional importance of food production to food security.

Outcome sought:

Amend introduction to note 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.

Amend the Background as follows:

The value of food production is increasing and will continue to increase internationally as demand from developing countries increases. The protection of land for food production and its role in domestic food security is an important sub-regional issue given high class soils are being lost to urban and rural-residential development.

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 progress of a National Policy Statement for Highly Productive land needs to be acknowledged as are reforms in other sections.

2.3. SECTION C - Meeting demand

It reads that there will be excess sufficiency in Tuakau and Pokeno (in the medium and long term), the reasons for this are not clear?

2.4. SECTION D - Our implementation programme

SECTION 4. 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.

2.5. SECTION E - Appendices

HortNZ is significantly concerned with the existing interpretation of the RPS by the Future Growth Strategy in regard to highly productive land and a suggestion that this strategy might then inform changes to the RPS. 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.

Appendix A

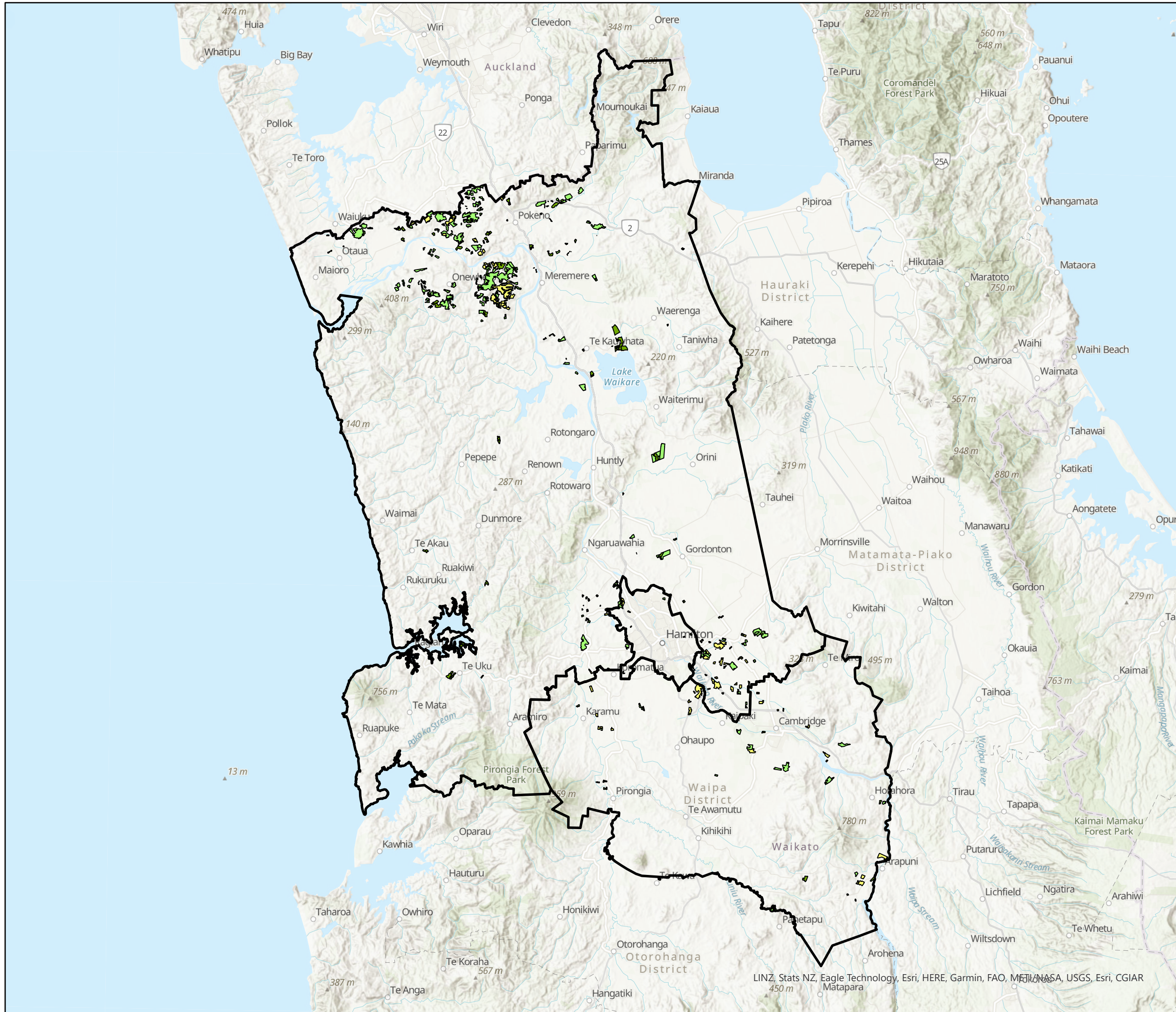
Analysis of Short Rotation Cropland across LUC 1, 2, 3

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



Waipa, Waikato & Hamilton City Districts

Short rotation cropland - LUC 1,2&3

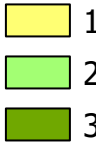


Figure 1 - Short Rotation Cropland on LUC 1,2&3 Land

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