

4. I support the adoption of a National Policy Statement for Highly Productive Land (NPS-HPL), on the basis that this will discourage inappropriate use and fragmentation of finite land that is suitable for commercial vegetable production (CVP). I do not however consider that soil (and to some degree topography) should be the only considerations in determining highly productive land. There are a number of factors that make up a viable productive unit. The reliance on the Land Use Capability system as an interim measure is, on this basis, considered to be unsuitable.
5. It is considered that the definition of Highly Productive Land **must take into account all essential criteria that make up a viable production unit**. These include soil type, size, topography, productivity and productive capacity, sustainability (specifically regarding the requirement for rotational cropping to avoid the build-up of soil pests and diseases), suitably consented irrigation water, reverse sensitivity, ability to utilise nutrients, viability and avoidance of biosecurity threat, and natural disasters. Unless all essential elements are in place to enable a viable production operation to be undertaken, it is perverse to restrict land use options.
6. It is also considered that the NPS-HPL must be looked at in the context of other proposed regulation. In particular:
 - the proposed National Environmental Standard for Freshwater (NES-FW) which essentially caps CVP to a limited area, despite a growing domestic population to feed.
 - the proposed National Policy Statement for Freshwater Management (NPS-FM) which identifies catchments that require rapid reduction in nitrates. These align in many cases to areas of land that are considered to be highly productive and used for CVP. Required nitrate reductions in some of these areas are as high as 80%. Reductions of between 30% and 50% are common and even at these rates of reduction, it is considered likely that many CVP businesses in these catchments will be unable to run a productive operation at the scale required to make the business viable.
7. The proposed National Policy Statement for Highly Productive Land (NPS-HPL) proposes to essentially 'lock' land into productive use, in order to prevent the valuable soil resource being fragmented or lost to urban expansion. However, if the land cannot viably be used for production, but cannot be used for any other use, the landowner stands to lose both their equity and their livelihood. Commercial vegetable production will reduce as a result and food may need to be imported to meet the growing fresh produce requirements of our country.
8. Pukekohe and the surrounds, in particular, provide a hub for commercial vegetable production (CVP) which significantly contributes to meeting the fresh produce demands of the domestic market¹ and is likely to be significantly adversely impacted by the cumulative effects of proposed regulation including the NPS-HPL, NPS-FM and NES-FW.
9. Pukekohe is unique within New Zealand as it presents favourable climatic conditions for the growing of crops, enabling winter production. In the north, crops are constrained by disease pressures, and further south may be subject to frosts.
10. Deloitte's acknowledged the significance of this location in providing for our national fresh vegetable consumption in 'New Zealand's Food Story – The Pukekohe Hub', August 2018 and confirmed that this area contributes to 26% of the nation's value of production of vegetables.

¹ Deloitte's New Zealand's Food Story 'The Pukekohe Hub' Prepared for Horticulture New Zealand, August 2018