

From: [Sir William Birch](#)
To: [Highly Productive Soils](#)
Cc: [Mark Wheeler](#); [Stefni Baigent](#)
Subject: FW: Submission on NPS - HPL
Date: Thursday, 10 October 2019 5:09:36 PM
Attachments: [Picture \(Device Independent Bitmap\) 1.jpg](#)
[Picture \(Device Independent Bitmap\) 2.jpg](#)
[Picture \(Device Independent Bitmap\) 3.jpg](#)
[Submissions.html](#)
[Capture.PNG](#)
[Capture - ME - Land use map.PNG](#)

Hi MPI,

Just correcting my comments about the soils in the Karaka referred to in my comments in the email below. The Land Use Map published by Market Economics is correct. I was misinformed regarding the soils on the Karaka. They are in the main class II and III on the LUC Map N49 and correctly shown on the ME map. Would you please note my earlier email accordingly.

Many thanks.

Kind regards,

Bill Birch
Sir William Birch FNZIS RPSurv



www.birchsurveyors.co.nz

From: Sir William Birch
Sent: Thursday, 10 October 2019 4:54 PM
To: soils@mpi.govt.nz
Subject: FW: Submission on NPS - HPL

Sending again

Kind regards,

Bill Birch
Sir William Birch FNZIS RPSurv



www.birchsurveyors.co.nz

From: Sir William Birch
Sent: Thursday, 10 October 2019 4:51 PM

To: sols@mpi.govt.nz

Cc: Mark Wheeler [REDACTED] Stefni Baigent [REDACTED]

Subject: Submission on NPS - HPL

To MPI

The comments below are in addition and part of the attached template.

“The major concern of the submitters is that a further National Policy Statement in addition to those for Fresh Water and Urban Development Capacity (NPS – UDC) is adding a further layer of regulation over the farming sector which is already suffering from over regulation. There is already confusion with the Waikato Regional Council regulating through PC1 to stop the conversion of high quality soils from pasture farming to cropping and this proposed NPC wanting to protect high quality soils for cropping!! The question being asked is “what are we protecting versatile soils for when PC ! will not allow us use for horticulture?”

The fact is that the 1984 LUC maps are not suitable for identifying highly productive land that should be protected. The geomorphology of the New Zealand landscape is complex and the boundary definitions between different land classifications is not precise. A close study of Map N 47 South Auckland for example confirms that the Karaka area contains land that has been classified substantially as class 4. However throughout this district there are various segments of the land that are class 2 and 3. This is characteristic of the New Zealand countryside. Most districts in NZ will have a mixed variety of land classes with indistinct boundaries and of various shapes and sizes.

In my submission on behalf of several Karaka land owners, I suggest that the NPS – HPL be folded into the NPS on UDC as it is on the fringes of the growth urban areas that the issue mainly arises. It would be much simpler for all parties if it was addressed as part of the population growth issue.

There are some areas where Highly Productive Land is under significant threat as a result of population growth pressures forcing the expansion of the urban areas and this should be the focus of the discussion paper. This essentially around the high growth urban areas and it is those areas that should be the focus of this exercise.

The protection of Highly Productive Land from urban development is necessary and it is important to have processes in place for this to be achieved. To achieve this Regional and District Councils should be requested by Government to consult with the food producing industries and property owners within their regions to identify the high productive land areas that are worthy of protection. The food producing industries are in the best position to identify the land areas and the economic and physical components which make these areas special for food production and therefore for protection. The Regional Councils can then use the powers under Schedule 1 of the RMA to protect these area. This can be achieved by folding into the NPS – UDC the necessary tools required by the Regional Councils without the need for a further complex National Policy Statement.

I note that in the Cabinet Paper on this subject that Treasury expressed concern in Para 8 (Copy

attached)around the NPC generating the risk of a conflict of policies and I agree. This risk will be mitigated by folding HPL into the UDC National Policy Statement.

I also note that in the paper by Market Economics it is suggested that Regional and Local Councils could use a process for identifying areas of HPL similar to that used for identifying Significant Natural Areas (SNA's) within their respective districts. It is an interesting thought although the HLP identification would be much more complex and have greater implications

It should be noted that much of the comment and concern about development of versatile soils around Pukekohe and elsewhere is misinformed in the sense that the recent Auckland Unitary Plan carefully avoided any Future Urban Zoning encroaching on areas of highly productive land. The recent housing developments on the cropping soils west of Pukekohe are a result of legacy decisions by previous councils made 10/15 years ago.

I note with concern also that the Land Use map published in the Market Economics's report is somewhat misleading in respect of the Karaka area (see attachment) in that it appears to suggest that the soils in Karaka are HPL whereas according to LUC map N48 the dominant soil classification in Karaka is class IV as noted earlier.

Yours sincerely,

Kind regards,

Bill Birch
Sir William Birch FNZIS RPSurv



www.birchsurveyors.co.nz

