



Proposed National Policy Statement for Highly Productive Land

Submission Template


We would like to hear your views on the proposed National Policy Statement for Highly Productive Land (NPS-HPL).

Please feel free to use this template to prepare your submission. Once complete please email to soils@mpi.govt.nz.

You can also make a submission using the online submission tool. A link to the online submission tool is available at www.mpi.govt.nz/HighlyProductiveLand.

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Are you submitting on behalf of an organisation? Yes [] No []

If yes, which organisation are you submitting on behalf of?

Farmr Ltd

Submissions are public information

All or part of any written submission (including names of submitters) may be published on the Ministry for Primary Industries' website, or the Ministry for the Environment's website. Unless you clearly specify otherwise in your submission, the ministries will consider that you have agreed to have your submission and your name posted on their websites.

Specific considerations

1. Vegetable growers depend on highly productive land and other resources to grow food for New Zealanders and for export.
2. Growers are affected by complaints when urban and lifestyle development and sensitive activities locate close to their operations. These complaints can reduce the ability of growers to use their land for growing food.
3. We support policy for a planned approach to urban and lifestyle development.
4. When planning urban and lifestyle development, we support a policy to maintain the productive capacity of Highly Productive Land.
5. The productive capacity of Highly Productive Land should be measured by the economic, social and cultural contribution of the land.
6. The productive capacity of land is dependent on natural and physical resources such as soil, climate, water and infrastructure. It is also dependent other factors including nutrient allocation policy and labour.
7. Maintaining the productive capacity of land must consider all relevant factors.
8. Some land with good soils and a favourable climate, may not be highly productive because of other constraints. For example: due to fragmentation. The National Policy Statement for Highly Productive land should not prevent urban or lifestyle development, on land that is not highly productive due to significant constraints. Constraints could include, but not limited to, access to water, buffer limits (size), cross boundary effects (noise), access to land (roadways and vehicle size) and harvest period constraints (hours of operation).
9. We support activities that enhance the productive capacity of Highly Productive Land being located on Highly Productive Land. For example, greenhouse growing, packing sheds, post-harvest facilities, distribution infrastructure may enhance the productive capacity of outdoor growers.
10. We support using incentives to improve the productive capacity of land, and in some cases, this could provide for the development of land identified as Highly Productive Land. For example, transferable development rights (TDR's) in exchange for title aggregation for reverse fragmentation, and TDR's for significant ecological enhancement.
11. We support policies to reduce reverse sensitivity issues. In most cases the grower has been on the land before the encroachment of urban development. It therefore stands that any development of a reverse sensitivity mitigation should be part of the subdivision activity. For example, requiring effective buffers from sensitive activities at the rural urban boundary and **within** a developer's site.
12. We support policies that place critical planning support for new sensitive activities, such as schools or places of worship, being developed on highly productive land, where the use would impact on the productive capacity of neighbouring Highly Productive Land.
13. We request that the proposals for HPL are considered in conjunction with the current reviews of NPS-FW and NES-FW to ensure there is no conflict between the purposes of each of these documents. In their current forms, the combined result of these policies could cause the restriction and prevention of vegetable growing as well as prevention of development of HPL. This will likely leave growers in an untenable situation and if this were the case growers would need to be provided with a solution if they were unable to use their land for primary production of vegetables, or develop/sell the land to the next best land use.
14. Crop rotation is an essential part of a good growing operation. Restricting the ability to change crop types, utilise HPL in different ways would significantly degrade current HPL and would increase occurrences of avoidable issues in crops such as brassica clubroot, onion white rot and onion smut, potato cyst nematode as well as other pest or disease incursions into NZ.

General considerations

Vegetable growers are stewards of the land and often are part of families that have been growing for more than five generations. They are very passionate about growing fresh healthy food in the best possible way for their communities and regions. Vegetable growers add a positive contribution to the community and the economy. The best way to grow vegetables and fruit is on the best land. Vegetable production has occurred in close proximity to population centres for many years. Over time, the increase in New Zealand's population has resulted in urban creep. In many cases this has caused highly productive land (HPL) used for vegetable production to be repurposed into housing for growing urban centres. This has seen the transition of well-established rural communities into smaller urban centres and satellite towns of large cities. In recent times, pressure to urbanise HPL through sub-divisions, houses, industrial parks and schools has highlighted the tension between creating housing and accommodation of a growing population and the ability to grow produce to feed this same population. Once urban planning is located next to horticulture, the productive capacity of the land is diminished. In this case, the pragmatic solution is to consider a land change to fit the dominant use. This is not an advocacy for land use change for LUC 1-3 class land. Just a need for clear planning of land next to urban development. Growing vegetables profitably requires a number of natural and man-made elements. There are also regulatory elements from Central and Regional Government.

The natural elements are water, soil and temperature / climate. The man-made elements for successful Commercial Vegetable Production (CVP) are infrastructure, markets and operations.

The regulatory elements are leading to constraints for CVP and stem from National Policy Statements such as the NPS-FW and NES-FW. The current review of these documents **may** lead to a cap on CVP, and place restrictions (to varying degree depending on catchment limits) on nutrient discharge and use. These reviews will likely lead to **minimum** standards and Regional Councils around NZ may impose stricter rules while giving effect to these National Policy Statements and National Environmental Standards.

It also signifies a step change for the current consenting pathway (under the RMA) for CVP at a regional level. In the past most CVP around NZ has been a **permitted** activity but the sector is facing increasing regulation leading to **controlled, restricted discretionary, discretionary and non-complying** activity status.

At a Regional and catchment level this is being experienced by vegetable growers ie; under Horizons One Plan and Waikato PC1 which has placed restrictions on Land Use Change to CVP, seeks to limit discharge of nutrients, does not allow for any intensification from a lower land use such as forestry or pasture to CVP. There is also uncertainty about Land Use Consent versus Discharge Consent and does not give certainty to growers about a clear consenting pathway for CVP.

Regulatory constraints are increasingly leading to restrictions on access to water for irrigation of crops grown under CVP.

All of these elements will have an effect on the productive capacity of the land. Where urban development is planned next to productive land the net result is a change in one or more of the elements. For example, the spraying of crops next to houses or other common growing practices will likely result in tension between urban dwellers and vegetable growers. This in turn **may** place limits on the operations of the CVP activity.

Any change in one of the elements could reduce the productive capacity of the land. If this happens to be the case it may be prudent to change the land use from CVP to other land uses which **may** include urban or commercial development. Vegetable growers support good planning to allow CVP and Urban intensification to coexist.

Furthermore, the inability to implement good growing practices such as crop rotation due to CVP being restricted under the proposed reviews NES-FW will likely cause degradation to soil health and potentially over intensification of CVP in order to maintain production. This is the opposite of what is trying to be achieved by the HPL NPS. Vegetable growers also ask the government to give consideration to the outcome of the reviews of NPS-FW and NES-FW currently being consulted on, in regards to the consideration of HPL proposals. We recognize that these are separate documents however their combined impact, particularly the Freshwater NES, could result in the disruption of vegetable production in New Zealand. There is a danger that large tracts of HPL could be left unable to be sold/developed or used for horticultural production if both NPS -FW and NES-FW are implemented in their most restrictive forms.

Vegetable Growers from all over NZ are facing increasing regulatory constraints with little if any consistency between different regions. Growers are seeking a pathway that enables long term certainty and investment, helps underpin innovation and succession, and continues to develop the science and technology that creates better environmental outcomes while recognising the importance of the cultural, social and economic benefits that our sector provides.