

**From:** [Merv](#)  
**To:** [Highly Productive Soils](#)  
**Subject:** NPS-HPL submission  
**Date:** Tuesday, 8 October 2019 3:14:03 PM

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**To:** The Ministries for Primary Industries and for the Environment

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**Or post:** *NPS-HPL Submission  
Land and Water Policy Team  
Ministry for Primary Industries  
PO Box 2526  
Wellington 6140)*  
<!--[if !supportLineBreakNewLine]-->  
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**Name of Submitter:** Mervyn Harding

## **Proposed National Policy Statement for Highly Productive Land**

We submit:

<!--[if !supportLists]-->1. <!--[endif]-->Growers depend on highly productive land to grow food for New Zealanders and for export.

<!--[if !supportLists]-->2. <!--[endif]-->Growers are affected by complaints when urban and lifestyle development is located close to their operations. These complaints can reduce the ability of growers to use their land for growing food.

<!--[if !supportLists]-->3. <!--[endif]-->We support policy for a planned approach to urban and lifestyle development.

<!--[if !supportLists]-->4. <!--[endif]-->When planning urban and lifestyle development, we support a policy to maintain the productive capacity of Highly Productive Land.

<!--[if !supportLists]-->5. <!--[endif]-->The productive capacity of Highly Productive Land should be measured by the economic, social and cultural contribution of the land.

<!--[if !supportLists]-->6. <!--[endif]-->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 water and nutrient allocation policy, and labour.

<!--[if !supportLists]-->7. <!--[endif]-->Maintaining the productive capacity of land must consider all relevant factors.

<!--[if !supportLists]-->8. <!--[endif]-->Some land with good soils and a favourable climate may not be highly productive because of other constraints. For example, no or limited access to irrigation, unable to apply sufficient fertiliser

<!--[if !supportLists]-->9. <!--[endif]-->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.

<!--[if !supportLists]-->10. <!--[endif]-->We support the location of activities that enhance the productive capacity of Highly Productive Land on that land. For example, glasshouses, packing sheds, post-harvest facilities, and distribution infrastructure that enhance the productive capacity of outdoor growers.

<!--[if !supportLists]-->11. <!--[endif]-->We support using incentives to improve the productive capacity of land. In some cases, this could provide for the development of land identified as Highly Productive Land. For example, transferable development rights in exchange for title aggregation.

<!--[if !supportLists]-->12. <!--[endif]-->We support policies to reduce reverse sensitivity issues. For example, requiring effective buffers at the rural boundary and within a developer's site.

<!--[if !supportLists]-->13. <!--[endif]-->We support policies to prevent new sensitive activities, such as schools or places of worship, being developed on Highly Productive Land, where the use would affect the productive capacity of neighbouring Highly Productive Land.

Signature: *M. T. O. Harding*

Name: Mervyn Harding

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[REDACTED]

Date: 08/10/2019