To: The Ministries for Primary Industries and for the Environment

Email: soils@mpi.govt.nz

Or post: NPS-HPL Submission Land and Water Policy Team Ministry for Primary Industries PO Box 2526 Wellington 6140

Name of Submitter: Trelawne Farm Limited



Date: 18 October 2019

Please note that this submission is made under a time extension granted for NZ Winegrowers.

Background:

Trelawne Farm Limited is a family owned business. The 183ha property is located 5km inland from Seddon on the south bank of the Awatere River. The land is fully irrigated supporting a range of intensive vegetable crops and an established 114ha vineyard. Guy Lissaman is the current chairman of the Awatere Water Users Group, representing AWUG on the Marlborough Environment Plan -Water Allocation Working Group and a past Board member on Marlborough Winegrowers Association.

Submission:

Proposed National Policy Statement for Highly Productive Land

We submit:

- 1. Growers depend on highly productive land for grape growing (viticulture) and food production for domestic consumption in New Zealand and for export.
- 2. Growers are affected by complaints when urban and lifestyle development is located close to their operations due to "reverse sensitivity". These complaints can reduce the ability of growers to use their land for grape growing and food production.
- 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 on other factors including water and nutrient allocation policy, and availability of 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, no or limited access to irrigation, unable to apply sufficient fertiliser.
- 9. 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.
- 10. Once a piece of land is turned from primary production to urban or residential development, it is unlikely to return to its primary production purpose. The loss of this primary production capacity should be considered in the scheme of planning urban expansion.
- 11. We support the location of activities that enhance the productive capacity of Highly Productive Land on that land. For example, wine making facilities, glasshouses, packing sheds, post-harvest facilities, and distribution infrastructure that enhance the productive capacity of outdoor growers. We also support the location of activities that support wine tourism on Highly Productive Land, for example: cafes, winery cellar doors, reception venues and boutique accommodation.
- 12. 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.
- 13. We support policies to reduce reverse sensitivity issues. For example, requiring effective buffers at the rural boundary and within a developer's site.
- 14. We support the establishment of methods to avoid reverse sensitivities at the interface between areas of highly productive land and adjacent rural lifestyle zones. Where the territorial authority is unable to avoid reverse sensitivities, the burden of mitigating the effects will rest on the urban or lifestyle land use and not the primary production land use.
- 15. 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:

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R. Guy Lissaman Managing Director -Trelawne Farm Ltd

Date: 18 October 2019