

To: The Ministries for Primary Industries and for the Environment
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NPS-HPL Submission
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Proposed National Policy Statement for Highly Productive Land.

We submit:

1. Vegetable growers depend on highly productive land to grow food for New Zealanders and for export. The demand for exported produce has growth targets set by central government which could be partly undermined by the permanent loss of land of high value for food production caused by urban sprawl.
2. Unfortunately for many vegetable growers over the past 20 years, the production of vegetables has become uneconomic. Supermarkets will not buy from small growers. Sometimes the profit which may be made from vegetable growing on small areas may be selling land or subdividing when zoning is changed from rural to urban, or lifestyle. The cost of compliances including the Food Safety Act has further reduced the economic sustainability of vegetable growing. These factors have been part of the process of the sale of small titles of rural of high value for food production land close to urban areas.
3. Changing regulations and restrictions on subdivision of land may not necessarily result in the highly productive land being used for food production. The land areas close to urban areas, may be too small for the surviving growers who have had to become large scale to survive. Vegetable growing is no longer economically sustainable for small growers.
4. 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.
5. We support policy for a planned approach to urban and lifestyle development. That should include planning for satellite urban developments connected by rapid transport to cities, and this process would reduce the pressure on urban subdivision in areas close to cities. This technique has been highly effective in China where more than 300 million people have moved from rural areas to cities over the past 15 years,
6. When planning urban and lifestyle development, it needs to be taken into consideration that small areas of land are no longer economic to produce food. For that reason small areas of land adjoining urban areas should still be subdividable.
7. New Zealand does not have to be producing all of its food domestically and it is inevitable that with new free trade agreements that importation of food is part of that process. If vegetables and other food can be imported at a lower cost than domestic production it is naïve to think that importation of more food will not occur. Therefore the need for land to be used for domestic food production in New Zealand will reduce in the near future, as new free trade agreements take effect.
8. 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.
9. The use of labour is becoming uneconomic for vegetable production. Mechanisation is increasing. There is less need for food production to be based close to urban areas, as the cost of transporting food by road produced by farms with a high degree of mechanisation is less than the high cost of manual labour.
10. Maintaining the productive capacity of land must consider all relevant factors.

11. 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.
12. 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.
13. 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 subdivision rights in exchange for title aggregation. Another example may be the subsidisation of production costs of vegetable growing to prevent the loss of small areas of vegetable production to being sold for urban development. This subsidisation occurs in Europe, and takes many forms.
14. One example of meeting social needs for employment which relates to land sale for urban development may be the subsidisation of labour to ensure that employment of low skill labour is available close to urban areas This may help prevent food production of vegetables moving to greater distances away from urban areas and increasing the mechanisation of production This would reduce the pressure for current vegetable growers to sell land for urban development.
15. We support policies to reduce reverse sensitivity issues. For example, the subsidisation of the costs of effective buffers at the rural boundary and within a developer's site .
16. 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.

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