

In the matter of: Proposed National Policy Statement for Highly Productive Land

And: **B.Das and Sons Limited**

Submitter

And: **Ministry for Primary Industries**

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Submission on Proposed National Policy Statement for Highly Productive Land

Dated: 07 October 2019

1. We support highly productive land to be protected to grow food for local and international markets unless constraints impact the growth of vegetables.
2. If growth constraints exist and the HPS land is not viable, development can be considered on the land.
3. Resources such as water, infrastructure, soil types and climates should be factored in when protecting soils.
4. Land which is highly productive (LUC1-3) but has constraints such as water restrictions, slope, erosion, and runoff and are already surrounded by housing should be considered for urban and lifestyle development.
5. Riparian buffers should be included when new development begins between the rural production and residential development zones. Riparian zones should be factored into the residential and not the rural production zoning. Buffers include setbacks from the road and/or plantations to mitigation rural noise and spray drift.
6. HPS (LUC1-3) Land which is currently zoned Future Urban or Residential should stay as that zoning as it has been incorporated into the council's development capacities.
7. LUC 1-3 Land which is zoned rural production should be protected unless constraints such as water, soil type, slope, runoff, access, micro climates and other relevant factors that hinder the growth of food.

8. Small pieces of land which have a LUC1-3 (i.e. 1-5ha) maybe considered for residential zoning as it may not be viable or cost effective to grow on that block of land.
9. Council should not look at LUC 1-3 alone when determining analysis and recommendations (Factors such as slope angle, erosion, water quantities etc.) should be factored in.
10. Council and Government need to engage with Horticultural NZ, Pukekohe Vegetable Growers Association and other vegetable grower committees
11. Council decisions should not be made solely on data, and should engage growers and consultant with them
12. Key factors to identifying highly productive soils should not be determined by the LUC data alone. Other factors such as nutrient retention, water, location, soil types and micro-climates should be incorporated into decision making and planning.

Signed: HBhula

Harsad Bhula