

## **ATTACHMENT B**

to

## **SUBMISSION ON A PROPOSED NATIONAL POLICY STATEMENT FOR HIGHLY PRODUCTIVE LAND**

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**By:**

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**To:**

**Ministry for Primary Industries,  
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### **An alternative way to identify highly productive land**

Sections 5 and 6 of my submission seek changes to the identification procedure::

- \* Designation of LUC Classes 1 & 2, together with some designated LUC 3 & 4 units (class subdivisions), and perhaps a few designated LUC 5 & 6 units - at NZLRI 1:50,000 scale - as “areas which will or may contain highly productive land”,
- \* Identification of highly productive land within these areas - by new mapping at 1:10,000 - 1:5,000 scale in accordance with NPS - HPL Appendix 1 criteria - just when and where a local authority receives applications to urbanise or lifestyle land within these areas.

The proposed changes should not be taken as indicating that I advocate a land use capability framework for the NPS - HPL. They constitute - based on personal experience of mapping LUC at property scale - what would be a practical alternative to a massive fixed time-frame mapping programme (likely to prove unachievable), if MPI's preference remains to identify highly productive land within a LUC framework.

I am also conscious that the proposed changes may be viewed by MPI's policy analysts as a reactive approach to protecting highly productive land. A proactive alternative may be to abandon the LUC-based approach, and instead adopt the concept of “terroir” (mentioned in Section 6.4 of my submission) i.e.

- \* Designate an entire geographical area as “highly productive land”, on the grounds that it's a landscape with soils and climate which demonstrably enable high-value food production at least in part (with potential for expansion onto the rest),
- \* Allow urban or lifestyle conversion of land within such an area, only where detailed

mapping demonstrates the site does not meet NPS - HPL Appendix A criteria.

There's already a public perception that certain landscapes around New Zealand are of high value for food production. A few examples are vegetable-growing districts in South Auckland and Hawkes Bay, fruit-growing districts in Nelson and Otago, avocado-growing districts in the Bay of Plenty and Northland, grape-growing districts nationwide. To define these landscapes as "terroirs" for the purpose of NPS - HPL, the questions which would need answered are :

- \* How might their boundaries be fixed for planning purposes?
- \* How might less well-known examples be identified?

If a "terroir"-based approach is adopted, I'd suggest that each regional authority might set up a working party composed of food producers - nominated by local growers' organisations - to answer the questions. Technical support to such a working party might be provided by a regional authority planner, a soil scientist, and a climatologist - provided all three are thoroughly familiar with the region and have good rapport with the growers.

Some reference to LUC classification might still be made, either in course of designating "terroirs", or when mapping sites to determine whether or not they meet Appendix A criteria. However it would become a component in a "terroir"-based approach, rather than a framework for identifying highly productive land.

While making these suggestions, I emphasise that I am now retired so am not looking to take up a technical support role. A number of experienced soil scientists - whether in the crown research institutes, local authorities or in private practice - are well able to identify the LUC and soil components of "terroir" in the Auckland region and elsewhere.