

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

And: **James Crisp Ltd**

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. This submission is on behalf of James Crisp Ltd in relation to Ministry for the Environment and Ministry for Primary Industries proposed National Policy Statement for Highly Productive Land. James Crisp Ltd will gain no competitive advantage through the lodgement of this submission.
2. James Crisp Ltd specialise in brand representation for food manufacturers, including sales, promotion, merchandising, logistics, warehousing, forecasting and reporting. In addition to this, James Crisp Ltd own properties in the Waikato region that are leased to Commercial Vegetable Growers. Two of these properties are in the Waikato river catchment and four properties are located within the Waihou-Piako river catchments.
3. We support the adoption of a National Policy Statement for Highly Productive Land (NPS-HPL), on the basis that this will discourage inappropriate use and fragmentation of finite land that is suitable for commercial vegetable production (CVP). We do not however consider that soil (and to some degree topography) should be the only considerations in determining highly productive land. There are a number of factors that make up a viable productive unit. The reliance on the Land Use Capability system as an interim measure is, on this basis, considered to be unsuitable.

4. We request that the HPL NPS is considered in conjunction with the proposed freshwater policy package to ensure that the intention of the NPS-HPL is not conflicted by the Freshwater proposals. As it currently stands, the combined result of these proposed policies could result in an inability to viably grow vegetables and may restrict land use options on a property that cannot achieve its productive capacity, especially through restrictions in essential elements such as water and nutrients.

Signed:



Henry Hall