

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

And: *Turner Shares Limited*
Submitter

And: **Ministry for Primary Industries**
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Submission on Proposed National Policy Statement for Highly Productive Land

Dated: 10 October 2019

1. This submission is on behalf of Turner Shares Limited in relation to Ministry for the Environment and Ministry for Primary Industries proposed National Policy Statement for Highly Productive Land. Turner Shares Limited will gain no competitive advantage through the lodgement of this submission.
2. Turner Shares Limited owns land at 111 Farm Park Road in Glenbrook, at the source of the Waitangi Stream, this land is managed and cultivated by Farm Park Produce Limited, a fully owned subsidiary of Turner Shares Limited.
3. Farm Park Produce Limited is a vegetable growing business, devoted to growing, packing and distributing fresh produce throughout New Zealand. Farm Park Produce supplies predominantly leeks, parsley and rhubarb and has also supplied spring onions in the past. All of Farm Park Produce's vegetables are marketed through Fresh Direct Limited. The business has implemented good management practices such as bunding and cleaning out outfall ponds. Due to the type of crops being grown, there is a longer rotation so there is less disturbance of the soil.
4. 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

entire parcel of land currently cropped by Turner Shares Limited is currently in productive use, however there are varying soil types across the land, confirmed by a 1954 Soil Map of the area¹. Under the current definition of Highly Productive Land, only certain parts of the farm would be considered to be 'highly productive'. The reliance on the Land Use Capability system as an interim measure is, on this basis, considered to be unsuitable.

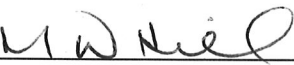
5. It is considered that the definition of Highly Productive Land **must take into account all essential criteria that make up a viable production unit**. These include soil type, size, topography, productivity, sustainability (specifically regarding the requirement for rotational cropping to avoid the build-up of soil pests and diseases), suitably consented irrigation water, reverse sensitivity, ability to utilise nutrients, economic viability and avoidance of biosecurity threat, and natural disasters. Unless all essential elements are in place to enable a viable production operation to be undertaken, it is perverse to restrict land use options.
6. It is also considered that the NPS-HPL must be looked at in the context of other proposed regulation. In particular:
 - the proposed National Environmental Standard for Freshwater (NES-FW) which essentially caps CVP to a limited area, despite a growing domestic population to feed.
 - the proposed National Policy Statement for Freshwater Management (NPS-FM) which identifies catchments that require rapid reduction in nitrates. These align in many cases to areas of land that are considered to be highly productive and used for CVP. Required nitrate reductions in some of these areas are as high as 80%. Reductions of between 30% and 50% are common and even at these rates of reduction, it is considered likely that many CVP businesses in these catchments will be unable to run a productive operation at the scale required to make the business viable.
7. The proposed National Policy Statement for Highly Productive Land (NPS-HPL) proposes to essentially 'lock' land into productive use, in order to prevent the valuable soil resource being fragmented or lost to urban expansion. However, if the land cannot viably be used for production, but cannot be used for any other use, the landowner stands to lose both their equity and their livelihood. Commercial vegetable production will reduce as a result and food may need to be imported to meet the growing fresh produce requirements of our country.
8. Pukekohe and the surrounds, in particular, provide a hub for commercial vegetable production (CVP) which significantly contributes to meeting the fresh produce demands of the domestic market² and is likely to be significantly adversely impacted by the cumulative effects of proposed regulation including the NPS-HPL, NPS-FM and NES-FW.
9. Pukekohe is unique within New Zealand as it presents favourable climatic conditions for the growing of crops, enabling winter production. In the north, crops are constrained by disease pressures, and further south may be subject to frosts.
10. Deloitte's acknowledged the significance of this location in providing for our national fresh vegetable consumption in 'New Zealand's Food Story – The Pukekohe Hub', August 2018 and confirmed that this area contributes to 26% of the nation's value of production of vegetables.
11. We urge you to thoroughly consider the definition of highly productive land. We also ask that you address the implications of restricting land use change in the context of other proposed legislation.

¹ General Survey of New Zealand (1954) *New Soil Bureau Bulletin 5*.

² Deloitte's New Zealand's Food Story 'The Pukekohe Hub' Prepared for Horticulture New Zealand, August 2018

12. We do not consider that regional councils are adequately resourced to cater for additional mapping requirements, again compounded by the excessive resourcing requirements imposed by numerous pieces of legislation currently proposed.
13. 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.
14. 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.
15. We support policies to reduce reverse sensitivity issues. For example, requiring effective buffers at the rural boundary and within a developer's site.
16. An alternative option not considered within this discussion document but generally preferred by the growers in our area would be a National Environmental Standard specific to Commercial Vegetable Production.

Signed:



Michael Hill