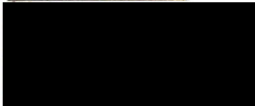


To: The Ministries for Primary Industries and for the Environment
soils@mpi.govt.nz

D Goettler
Brookdale Ltd



10.10.19

Proposed National Policy Statement for Highly Productive Land.

We submit:

1. We support policy for a planned approach to rural and commercial servicing which also further enhances food production and distribution capacity of highly productive land in the surrounding area.
2. The productive capacity of land is dependent on natural and physical resources such as soil, climate, available water and infrastructure, size, fragmentation and potential reverse sensitivities. Some land with good soils and a favourable climate, may not be so highly productive for food production because of other constraints, yet has potential to significantly enhance sustainability and productive capacity of the district and region. The National Policy Statement for Highly Productive land should not prevent rural and commercial servicing on land that is strategically positioned near rail and existing significant primary industry.
3. We support the location of activities that enhance the productive capacity of Highly Productive Land in the vicinity, on titles numbers NA107C/298, 39431, 608837 Brookside Rd Glenbrook, South Auckland.
4. We support using incentives to improve the productive capacity of land generally. In some cases, this could provide for the development of land identified as Highly Productive Land. For example, transferable development rights (TDR's) to appropriate receiver area, in exchange for title aggregation, and the proven mechanism of TDR's for significant ecological enhancement.
5. We support policies to reduce reverse sensitivity issues generally. For example, requiring buffers at the rural boundaries.
6. Any highly productive soil which is removed during any development, or provision of building, yard, accessways, can be relocated to a nearby HPL site to further enhance food production capacity at selected site.
7. The HPL provisions should not be given effect to immediately as may be proposed, however in any scenario, we request that this title is exempt from HPL designation, and remains ready to further service productive capacity in the surrounding area.

Dm Goettler
Brookdale LTD