

10 October 2019

Ministry for Primary Industries

Proposed National Policy Statement for Highly Productive Land

Submission via email: soils@mpi.govt.nz

Draft National Policy Statement for Highly Productive Land – Submission on behalf of T&G Global Limited

T&G Global Limited (**T&G**) welcomes the opportunity to make a submission on the proposed National Policy Statement for Highly Productive Land Discussion Document (**NPS-HPL**) submitted for public consultation in August 2019.

1. Introduction

T&G undertake horticultural activities. This includes growing under glass house cover, packing depots, transport of produce, accommodation of horticultural workers and general administration and office functions.

T&G is a Recognised Seasonal Employer (RSE) under the associated scheme and employs RSE workers.

T&G are generally supportive of the proposed NPS-HPL and acknowledge the need to protect highly productive land. T&G request the following amendments are required to the NPS-HPL as summarised below:

- Amend the definition of “Sensitive Activity” to exclude accommodation of seasonal and other horticultural or agricultural workers.
- Amend the definition of “Primary Production” to include all buildings and activities ancillary to the horticultural activities undertaken on site.

These are expanded on below.

2. Policy 5: Reverse Sensitivity and Interpretation “Sensitive Activity”

2.1 Support in Part

T&G support the inclusion of a policy to protect highly productive land from reverse sensitivity issues arising from sensitive and incompatible activities locating within and adjacent to areas of highly productive land subject to amendments to recognise minor dwellings as a typical and accepted feature of the rural environment.



2.2 Reasons

The potential for reverse sensitivity between primary production located on highly productive land and sensitive or incompatible activities which locate in close proximity need to be managed to ensure that land protected for productive use can be used efficiently for this purpose.

Notwithstanding T&G submit that accommodation of seasonal and other horticultural or agricultural workers within the rural environment is an important aspect of the continuing function of horticultural activities. The nature of such a use does not give rise to reverse sensitivity effects in the same way as other residential activities because rural workers are aware of, and familiar with the effects associated with rural production activities. T&G recommend that the proposed definition of “sensitive activity” is amended to recognise the need to accommodate seasonal and other horticultural or agricultural workers within the rural environment.

Relief Requested –

Interpretation

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Sensitive activity means an education facility, communication facility, residential activity, visitor accommodation, retirement village, health facility or hospital, marae.

Excludes:

Accommodation of seasonal and other horticultural or agricultural workers.

3. Interpretation “Primary Production”

3.1 Oppose

T&G oppose the proposed definition of “primary production” as it does not include all buildings and activities ancillary to the horticultural activities undertaken on site.

3.2 Reasons

The NPS seeks to provide for primary production on Highly Productive Land. The current definition of Primary Production includes the initial processing of commodities as an ancillary activity to the primary production, and provides for the land and buildings used for that processing. There are other activities that may be required to facilitate primary production on highly productive land such as logistics and general administration. Therefore T&G consider

that the definition should provide for all buildings and activities ancillary to the horticultural activities undertaken on site.

Relief Requested –

Interpretation

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Primary Production means:

a. Any agricultural, pastoral, horticultural, or forestry activities; and

b. Any buildings and activities ancillary to the listed activities in a);

~~b-c.~~ Includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a); and

~~c-d.~~ Includes any land and buildings used for the production of the commodities from a) and used for the initial processing of commodities in b)

~~e.~~ Excludes further processing of those commodities into a different product.

4. Conclusion

T&G thank the Ministry for Primary Industries for the opportunity to submit on the proposed National Policy Statement for Highly Productive Land. T&G generally support the proposed National Policy Statement subject to addressing the concerns outlined in this submission and amending the policy statement accordingly.

Yours Faithfully



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(Person authorised to sign on behalf of submitter)

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