



Proposed National Policy Statement for Highly Productive Land Submission Template

We would like to hear your views on the proposed National Policy Statement for Highly Productive Land (NPS-HPL).

Please feel free to use this template to prepare your submission. Once complete please email to soils@mpi.govt.nz.

You can also make a submission using the online submission tool. A link to the online submission tool is available at www.mpi.govt.nz/HighlyProductiveLand.

Contact details

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Are you submitting on behalf of an organisation? Yes [] No []

If yes, which organisation are you submitting on behalf of?

Southern Cross Growers Ltd

[Signature]

10.10.19

Submissions are public information

All or part of any written submission (including names of submitters) may be published on the Ministry for Primary Industries' website, or the Ministry for the Environment's website. Unless you clearly specify otherwise in your submission, the ministries will consider that you have agreed to have your submission and your name posted on their websites.

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

Proposed National Policy Statement for Highly Productive Land.

We submit:

1. We support policy for a planned approach to rural commercial servicing and/or lifestyle development which further enhances food production capacity 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, is not highly productive for food production because of other constraints, yet enhances productive capacity of the district and region. The National Policy Statement for Highly Productive land should not prevent rural commercial servicing or lifestyle development on land that is not highly productive due to proven constraints.
3. We support the location of activities that enhance the productive capacity of Highly Productive Land in the vicinity, on these fragmented land titles [REDACTED] at [REDACTED] Te Poi which provide farm servicing and distribution infrastructure that enhances the productive capacity of the balance of the farm and the region.
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 boundary and within a residential developer's site.
6. Approx 8ha would be a workable minimum size for a title to be considered for HPL designation, and the % of Class1-2 soil should be high.
7. Any highly productive soil which is removed during development, or provision of building, yard, accessways, would be relocated to a nearby HPL site to further enhance food production capacity at selected site.
8. 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 service productive capacity in the surrounding area.