



Proposed National Policy Statement for Highly Productive Land

Once complete please email to soils@mpi.govt.nz.

A link to the online submission tool is available at www.mpi.govt.nz/HighlyProductiveLand.

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Questions for submitters

The questions for submitters that are included throughout the discussion document are provided below. We encourage you to provide comments to support your answers to the questions below. You do not have to answer all questions for your submission to be considered.

The page numbers mentioned below indicate where further information about the question is located in the discussion document.

Answers:

I am very pleased to see that the issue of productive lands and their protection is being considered by central government; I commend this incentive.

I have not had time to read the extant consultation documents, with implications concerning urban sprawl and other non-production uses of fertile land. However I have some intuitive issues that I want to raise here, as follows (the grey background colour of the table is distracting):

Section 3.2: Urban expansion on to highly productive land [page 24]

How is highly productive land currently considered when providing urban expansion? Can you provide examples?

I have deep concerns for the loss of the highly fertile volcanic soils of the Auckland Region. I spent my childhood in Auckland so am well aware of how valuable a quarter acre section was in terms of home orchards. My health depended on the abundance of (organically grown) fruits available year round, including myriad citrus through winter. We had golden queen peaches, crisp pears, grapefruit, oranges, lemons, granny smith apples, grapes, passion fruit, figs, and a veggie garden. The bees were very busy too, with all that fruit to pollinate as well as the clover carpeting the lawn, and a tearful me so many times a summer as vinegar and bicarb was dabbed onto stings to assuage my indignation and swelling feet. Auckland is still bright orange through winter with backyard citrus but less and less so as urban intensification increases. This highly important use of fertile urban land is being lost, forgotten and under-valued with urban intensification. The agricultural productivity of the central Auckland volcanic field has essentially been lost now, but I am pleased that the surrounding, less productive, but still highly prized and valuable soils, are being considered for protection against potential, and detrimental, loss to intensive urbanisation. One solution to the loss of backyard orchards is to create urban intensification around parks, where the parks are central to the residential infrastructure. The



parks will be hubs of orcharding and veggie gardens, with play areas intertwined. Travelling through the United Kingdom many years ago I saw vast, residential estates, intertwined with wide, open grassed areas. Those areas were cultural dead zones where only monoculture grass grew, and the wind gathered speed. We can do better than that by providing cultural spaces where indigenous and other wild species are given consideration in tree'd and flowering urban environments.

Section 3.4: Reverse sensitivity [page 26]

How should the tensions between primary production activities and potentially incompatible activities best be managed?

From my viewpoint it is not so much the incompatible activities around productive lands but the reverse.

When I bought my half acre section 30 years ago I was surrounded on 2 sides by pastoral beefstock farming. That was not a problem for me. However it intensified over the ensuing years into dairy to the extent that there is now an almost continuous sick smell of ammonia, silage, nauseating diarrhoea in the air around me. A cattle race has been created abutting my property and it too often stinks and effluent washes off and into my property. Myriad farm machinery uses it to access the newly-created 50ha farm area on a formerly regenerating acid, peat terrace. Tractors and their trailers, huge diggers, noisy quad bikes, all belch diesel and petrol into my formerly organic garden as they pass along the race. A bund was put up along my other boundary, plugging the natural drainage out of my property and into the farm, so now I have a swimming pool in my property whenever it rains. Then there's herbicide and pesticide spray drift, which drift has constraints in place on paper but in practice is not heeded at all. I asked at my local medical surgery for my blood sample to be taken to test for herbicide after an aggressive assault on weeds using a high pressure hose in the vicinity of my property. I waited several weeks for results, and when I finally rung I was told, "Oh, no, we don't test for herbicides, you need to go to a professional service for that, and testing is very expensive". Defeat by suppression and oppression. Local council pampers the farmer and his production over my residential concerns.

There needs to be strong direction to protect residents from the adverse effects of dairy intensification.



How can reverse sensitivity issues at the rural-urban interface best be managed?

1. From a productive land angle, there needs to be clear spatial lines drawn up to protect productive land. Further urban intensification needs to occur preferentially in marginal lands.
 2. From a residential angle there needs to be minimum spatial buffers in place between residential properties and dairying activities.
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Section 5.2 Purpose of the proposed National Policy Statement [page 34]

Should the focus of the National Policy Statement be on versatile soils or highly productive land more broadly? Why/why not?

An unfortunate problem with dairy intensification is that it has encroached into marginal lands which in earlier times had been cleared but were not productive due to infertile soils, and thus very often left to regenerate. Those marginal lands have often been too acid to support primary production but can be highly fertile in terms of indigenous land cover and habitat. Now, with the easy availability of synthetic fertilizers, not least synthetic nitrogen, those marginal lands have been turned into pastorally productive lands, with a very high cost to the natural environment, including waterway pollution and loss of yet more indigenous habitat, and spread of pest weeds and vermin. If there was national direction to protect versatile soils then marginal lands may have had more chance of protection also.

Should the focus of the National Policy Statement be on primary production generally or on certain types of food production activities? Why/why not?

Into the future, as a species, we will come to rely on the use of meat less and less, so to future-proof productive land, horticulture and livestock production need to be addressed separately.



Policy 5: Reverse sensitivity [page 47]

How should the National Policy Statement direct the management of reverse sensitivity effects on and adjacent to highly productive land?

Please see my answer to section 3.4, which says

1. From a productive land angle, there needs to be clear spatial lines drawn up to protect productive land. Further urban intensification needs to occur preferentially in marginal lands.
2. From a residential angle there needs to be minimum spatial buffers in place between residential properties and dairying activities.

Specific questions

Appendix A: Criteria to identify highly productive land [page 41]

Should there be a default definition of highly productive land based on the LUC until councils identify this? Why/why not?

LUC is a highly valuable categorization of land that has a long and strong history of identification of land classes, resulting in a robust, reliable classification system. The LUC provides easy identification of highly productive land, and the classes that encompass highly productive land should become the default, with regional considerations encapsulated.



Specific questions

Policy 5: Reverse sensitivity [page 47]

How can the National Policy Statement best manage reverse sensitivity effects within and adjacent to highly productive land?

Please see my answer to section 3.4, which says

1. From a productive land angle, there needs to be clear spatial lines drawn up to protect productive land. Further urban intensification needs to occur preferentially in marginal lands.
2. From a residential angle there needs to be minimum spatial buffers in place between residential properties and dairying activities.

Also,

3. there needs to be buffering between productive and industrial lands, which buffering includes spatial and air-pollutant discharge.

Frida Inta

10th October 2019.