

From: [Peter Nagels](#)
To: [Highly Productive Soils](#)
Subject: National Policy Statement for Highly Productive Land - SUBMISSION (by Peter Nagels, Auckland NZ)
Date: Tuesday, 8 October 2019 3:45:48 PM

My submission is as follows :

Preliminary comments / introduction - Intelligent people will understand that humans continually modify the natural environment (often described as 'development') and thus generate detrimental effects - but without really mitigating the effects.

There is no need to describe or debate the many resulting adverse effects, such as destruction of rich topsoils, erosion washing the exposed topsoils into watercourses and to the oceans, dumping of most topsoils into landfills, significant ground compaction and hardening of the earths surface, substantial formation of impervious surfaces, increased stormwater runoff and pollution, deterioration of water quality, loss of aquatic life in streams and rivers, unattractive or ugly urban sprawl, night time illumination of once rural areas, car dependency, air pollution, siltation of rivers and harbours, waste generation. And more.

These man-made effects are long term and irreversible and must contribute to global warming. But the loss of food producing agricultural land is really a tragedy for New Zealand. It is totally unnecessary and rather stupid. There are better options to accommodate population growth rather than sprawling over good fertile productive land, and covering the land with impervious surfaces. Why is such mindless subdivision of land approved in NZ..? Very few people respect and exercise custody for the surface of the earth.

SUBMISSION - Issues which this submission wishes to address.

1. Planning consents and AEE's - With development applications (subdivisions, resource consents), the AEE's submitted to Councils tend to be inexpert, inaccurate or simply overlook the most important externalities. As clarification, the AEE's are prepared by a consultant who is acting in the interests of their client i.e. a developer. Hence the AEE's will be incomplete. Why would a consultant state what the real effects will be..? and thus get offside with his client, the developer.

In my experience, the environmental effects are never challenged by Council staff, only minor effects related to traffic movements, noise and the like. The soil loss, loss of agriculture etc is brushed aside, because planners see that because that urban sprawl is allowed for in District or Unitary Plans - therefore it is legitimate, albeit senseless. However as background to District Plans, a s.32 RMA analysis is supposed to be carried out for District Plans. Some important matters - such as the environmental effects, long term food production loss etc - these matters are poorly accounted for - if at all. I reckon Town Planning strategists do not understand agriculture, nor infrastructure too well. Horticulturists and agriculturists are generally never consulted for District Plans, but must be. The current system is not good at consultation. The narrow-minded NZ mindset simply says lets have 'more sprawl'. Some politicians also say this.

My submission asks that AEE's for developments must be accurate and incisive, prepared with knowledge. The AEE's must demonstrate in some detail how the adverse effects will be comprehensively managed (if that is possible), and the AEE **NOT** done in a token manner. Horticultural and agriculture specialists must provide inputs on land quality. There must be integrity.

However when there is loss of rural land - the development or subdivision, the application

must be declined. There is far too much needless desecration of quality farmland, orchards and landscapes in NZ.

2. **District / Unitary Plans** - Matters relating to the protection of quality soils / excellent farmland / horticultural land must be specified in these Plans (residential subdivision of productive land to be a prohibited activity) and shown in all maps of the area. Urban limits must be defined. The hydrological alteration of catchments, loss of natural soil structure and permeability, significant increase in stormwater runoff need to be spelt out in District Plans. NZ is a high rainfall country.

3. **Quality decision making** - When it comes to changing the land use of highly productive land, (or good agricultural land for that matter), it would be appropriate that the high level decision makers (commissioners) have the capacity to make the tough decisions and not just acquiesce.

Intervention by our civic leaders (politicians, Council CEO's, watch dog groups etc) should also be possible - and enabled in future legislation - to reverse irrational decisions and allow sustainable agricultural solutions. It is not good enough to allow high ranking, highly paid Council executives, and similarly elected politicians to be asleep at the wheel while poor decisions in relation to land use are made in their area. That is irresponsible. There should be powers to override irrational land use decisions.

4. **Revoke current District / Unitary Plans** with land use plans that currently indicate future sprawl / destruction of rural land on the outskirts of towns and cities in NZ. Land Use decisions made since 2015 should be reviewed and revoked where possible.

5. **Saving the soil.** Rather than dump the enormous quantities of topsoil into landfills (the current practice), or let it wash away, the soils must be treated as a valuable resource. Some commentators will claim the topsoil gets saved, however that is wrong. In many places the topsoil is 0.5m to 1m deep, there is too much topsoil to recycle. The topsoil is often stockpiled into heaps which become sludge and therefore gets wasted. Some topsoil is salvaged, but the majority is dumped.

6. **Rise up NZ** - Towns and cities must start building up with medium rise buildings. Not outwards.

If possible, I would like to speak to this submission hearing.

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