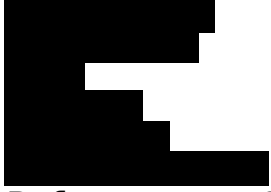


# Your submission to Proposed National Policy Statement for Highly Productive Land

as above, N/A (Jennifer Lindsay Kelly)



## Reference no: 1

### Clause

What are the values and benefits associated with existing food growing hubs and how can these be maximised?

### Notes

Soils need to be explicitly identified and classified according to their composition and nutrient content, which are of serious value to our primary industries.

### Clause

What are the values and benefits associated with highly productive land?

### Notes

The value of highly productive land is in both the economic and nutritional value and benefits it provides for the nation. It is vital for the physical health of the nation, which is currently not as good as it should be. New Zealand also has the ability to be one of the "food baskets" of the world. Our primary industries as a food producer have long been the financial backbone of New Zealand. By adding value here, as well as exporting, our economy can thrive through providing employment and goods for the domestic market and export trade.

### Clause

Does the RMA framework provide sufficient clarity and direction on how highly productive land should be managed? Why/why not?

### Notes

Not currently because already too much of the premium horticultural land i.e. surrounding Pukekohe has been built on and zoned for residential development. Growers have been priced out of the market, when wanting to expand.

### Clause

Does the RMA framework provide sufficient clarity on how highly productive land should be considered alongside competing uses? Why/why not?

### Notes

As above and papers on elite soils were sent to the previous government to no avail. The theory is there but the RMA framework is not strong enough nor strictly, or uniformly required to be followed by local governments.

### Clause

How are values and wider benefits of highly productive land being considered in planning and consenting processes?

### Notes

They aren't, and explicit directives are required.

### Clause

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

### Notes

Pukekohe Hill, which contains unique, premium soils should not have been built on in recent years. Another example is land around Te Kauwhata that was part of the early Dept of Agriculture's Experimental Farm 1892- and later Agricultural Research Station then Hort Research until 1990 has been subdivided in the last decade. This is where the government's first viticulturalist was employed in 1901 and fruit farms were balloted in 1911. Trains took grapes, for which the area is still remembered, to Auckland daily. Orchards thrived until the 1980s. Why would the land have been seen fit for subdivision and not food production? - Market forces. No adequate legislation or foresight in place to properly protect highly productive land. (Soil tests early last century may not equate to today's.) The desire for housing providing a way for personal and collective desired capital gain, instead of long-term national benefit from produce through health, export and tourism benefits.

### Clause

How should highly productive land be considered when planning for future urban expansion?

### Notes

The use of the most highly productive land for future urban expansion needs to be embargoed for the long term health and well-being of the nation's people and the environment. The proximity to large population centres and ease of transportation needs to also

be a prime consideration. Sustainability is a key word here.

**Clause**

How is highly productive land currently considered when providing for rural-lifestyle development? Can you provide examples?

**Notes**

It isn't obviously or consistently. No forethought seems to go into the long-term viability. Karaka is an example of lifestyle properties with vast lawns cum gardens on productive land, providing no economic return other than growth in private capital value. Commuter traffic is particularly bad here with four lanes currently merging into two. Huge amounts of money have been wasted on roading and are lost in time and air pollution. The land's productivity has been lost forever, as consequently have some related local employment and export opportunities.

**Clause**

How should highly productive land be considered when providing for rural-lifestyle development?

**Notes**

Very carefully. If the productivity is of the highest ranking then it should not be permitted. Lesser rankings can be zoned accordingly. A rural lifestyle should necessitate realistic plans for niche market employment or production e.g. fruit, special crops or animal breeding. It should not be about selfish dreams, which are out-grown as children no longer want a pony and feeding a few steers becomes a chore. Zoning needs to be done scientifically according to soil types. The practice of removing topsoil and changing land contours when subdividing also needs looking into. - Is it really best practice, who says and why???

**Clause**

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

**Notes**

This is, and will likely be, the main contention in Pukekohe, where a successful change will be considered to affect recent residents. Education of both parties is the only solution.

**Clause**

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

**Notes**

We have the scientific knowledge to produce and use methods or sprays that are not carcinogenic or otherwise toxic on crops. Animal odours are natural and have to be accepted but should only be in close proximity to houses for comparatively short periods. Pet (dog) issues are generally managed through local government laws.

**Clause**

Do you agree that there is a problem? Has it been accurately reflected in this document?

**Notes**

Yes. App A, Table 4, Option 8.1 1NPS is good. An NPS required as it is a national responsibility and good governance. It is in the nation's long term interest.

**Clause**

Are you aware of other problems facing highly productive land?

**Notes**

Areas of it are being reduced.

**Clause**

Which option do you think would be the most effective to address the problems identified in Chapter Three? Why?

**Notes**

Table 1 Option 1 NPS because it looks to be the most effective and expedient.

**Clause**

Are there other options not identified in this chapter that could be more effective?

**Notes**

Immediate action is needed. Some areas are already too urbanised. Prime soils close to large population centres need to be retained for food supply as much as possible, so contributing to global sustainability.

**Clause**

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

**Notes**

Highly productive soils are the most important but correct management methods need to be ensured. Versatile soils are also of value, so the key is in the scientific expertise in evaluation, and in the location relative to purpose.

**Clause**

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

**Notes**

It needs to cover both; our nutrition and export income are equally important for national wellbeing.

**Clause**

Do you support the scope of the proposal to focus on land use planning issues affecting highly productive land? Why/why not?

**Notes**

I think it is about as reasonable as it can be with the complexities that exist. Coming from a background of primary producers; preserving highly productive land is extremely important and an immediate priority.

**Clause**

What matters, if any, should be added to or excluded from the scope of the National Policy Statement? Why?

**Notes**

The Essential Freshwater programme certainly needs to be included in the scope.

**Clause**

Should future urban zones and future urban areas be excluded from the scope of the National Policy Statement? What are the potential benefits and costs?

**Notes**

No, damage has already been done, there should be areas of less productive soils within radius. The benefits could be that urban areas might become less dense with productive, not just recreational, green belts in a closer environs. This could enable a better understanding of urban and rural life.

**Clause**

Should the National Policy Statement apply nationally or target areas where the pressures on highly productive land are greater?

**Notes**

It should apply nationally but also immediately target areas where the pressures are greater e.g. Pukekohe hill area and surrounds, also areas in Hawkes Bay, Otaki, Wairarapa and Nelson to name a few.

**Clause**

What would an ideal outcome be for the management of highly productive land for current and future generations?

**Notes**

More, and clear, guidance on what is "appropriate" or "inappropriate" use of such land. The scientific evidence of the soil designation needs to dictate this.

**Clause**

If highly productive land is to be identified, how should this be done and by whom?

**Notes**

Regional Councils will have most of the information already and it will be accessible to District Councils. We have plenty of soil scientists and much research has already been done. A standard best practice formula may have to be agreed and publicised.

**Clause**

Are the proposed criteria all relevant and important considerations for identifying highly productive land? Why/why not?

**Notes**

Documentation so far makes sense.

**Clause**

What are the pros and cons associated with prioritising highly productive land for primary production?

**Notes**

What you have done looks excellent.

**Clause**

Do you think there are potential areas of tension or confusion between this proposed National Policy Statement and other national direction (either proposed or existing)?

**Notes**

Auckland's Unitary Plan is the biggest problem; with the soils on, and around, Pukekohe Hill already having been compromised. This needs to be halted as soon as possible.

**Clause**

How can the proposed National Policy Statement for Highly Productive Land and the proposed National Policy Statement on Urban Development best work alongside each other to achieve housing objectives and better management of the highly productive land resource?

**Notes**

With education and co-operation.

**Clause**

How should highly productive land be considered when identifying areas for urban expansion?

**Notes**

The mostly highly productive land should not be considered for urban expansion at all, but you have made a good start.

**Clause**

How should the National Policy Statement direct the management of rural subdivision and fragmentation on highly productive land?

**Notes**

Soil quality must dictate. The amalgamation of small lots for productive purposes should be permitted where practical and possible, due to soil quality and surrounding land use.

**Clause**

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

**Notes**

Buffer zones of light industrial or green belts.

**Clause**

How should the National Policy Statement guide decision-making on private plan changes to rezone highly productive land for urban or rural lifestyle use?

**Notes**

This is a potential minefield and the stuff of lawyers dreams. Tight regulation is required.

**Clause**

How should the National Policy Statement guide decision-making on resource consent applications for subdivision and urban expansion on highly productive land?

**Notes**

The above applies.

**Clause**

What guidance would be useful to support the implementation of the National Policy Statement?

**Notes**

Consistency should be evident and helps to demonstrate fairness. However there is a need for areas of NPS - UD and LJC near centres of both high population and transportation to be implemented as soon as possible, and stringently. Most regional councils in the areas of high concern should already have the necessary soil identifications, as will some district councils. Such a policy was needed at least 10 years ago. Delays of another two to five years will mean yet more crucial productivity will be lost.

**Clause**

How should the National Policy Statement best influence plan preparation and decision-making on resource consents and private plan changes?

**Notes**

If too impractical to apply nationally, legislation and targeting areas where the pressure is greatest is the best alternative.

**Clause**

Should the National Policy Statement include policies that must be inserted into policy statements and plans without going through the Schedule 1 process? What are the potential benefits and risks?

**Notes**

Without going through the Schedule 1 process because it is in the best interest of the nation for the long term. It will also limit wasting time with hearings and court cases. The risks are dissent from sub-division and developer interests.

**Clause**

What areas of land, if any, should be excluded from the scope of the proposed National Policy Statement? Why?

**Notes**

The parameters should be set so that no land should be excluded, unless National Parks or Reserves in perpetuity.

**Clause**

What level of direction versus flexibility should the objectives provide to maintain the availability of highly productive land for primary production?

**Notes**

Future zones need to be re-thought: The objective is to provide direction, not flexibility.

**Clause**

Should the objectives provide more or less guidance on what is "inappropriate subdivision, use and development" on highly productive land? Why/why not?

**Notes**

As above; direction, not merely guidance, is needed.

**Clause**

What are the pros and cons of requiring highly productive land to be spatially identified?

**Notes**

I don't see any cons about having soils correctly identified when it comes to ensuring the best use of them in the long-term interests of both the nation's and global sustainability.

**Clause**

Is the identification of highly productive land best done at the regional or district level? Why?

**Notes**

The Regional soil classification does it. LUC 1 & 2 are preferable but at district level, away from main population centres LUC 1,2,3 may be practical.

**Clause**

What are the likely costs and effort involved in identifying highly productive land in your region?

**Notes**

I believe that the soils have already been identified already by the Regional Council and are used, but not obviously, by the District Council.

**Clause**

What guidance and technical assistance do you think will be beneficial to help councils identify highly productive land?

**Notes**

There should already be appropriately qualified people employed by councils, or appropriately qualified consultants readily available. Not to mention tertiary institutions with the expertise. Better publicity would be beneficial.

**Clause**

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

**Notes**

Yes definitely, good governance is about providing leadership.

**Clause**

What are the key considerations to consider when identifying highly productive land? What factors should be mandatory or optional to consider?

**Notes**

You have it in 5.4.

**Clause**

What are the benefits and risks associated with allowing councils to consider the current and future availability of water when identifying highly productive land? How should this be aligned with the Essential Freshwater Programme?

**Notes**

It does need to be aligned with the Essential Freshwater Programme. Pity the two couldn't have been collaborated better.

**Clause**

Should there be a tiered approach to identify and protect highly productive land based on the LUC class (e.g. higher levels of protection to LUC 1 and 2 land compared to LUC 3 land)? Why/why not?

**Notes**

Absolutely and obviously!

**Clause**

How can this policy best encourage proactive and transparent consideration of highly productive land when identifying areas for new urban development and growth?

**Notes**

The proposed seems realistic, but not as stringent as I'd prefer.

**Clause**

How can the proposed National Policy Statement for Highly Productive Land best align and complement the requirements of the proposed National Policy Statement on Urban Development?

**Notes**

The answer is in the soil designation. The most productive not to be built on. - New thinking, sustainability.

**Clause**

Should the National Policy Statement provide greater direction on how to manage subdivision on highly productive land (e.g. setting minimum lot size standards for subdivisions)? If so, how can this best be done?

**Notes**

Yes! Agreed scientific consensus involves facts whether disliked or not.

**Clause**

Should the proposed National Policy Statement encourage incentives and mechanisms to increase the productive capacity of highly productive land (e.g. amalgamation of small titles)? Why/why not?

**Notes**

Yes, but where appropriate.

**Clause**

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

**Notes**

Through green belts and good farming practices, using our own innovation and education.

**Clause**

Should these policies be directly inserted into plans without going through the Schedule 1 process (i.e. as a transitional policy until each council gives effect to the National Policy Statement)? What are the potential benefits and risks?

**Notes**

Yes. This was answered previously.

**Clause**

How can these policies best assist decision-makers consider trade-offs, benefits, costs and alternatives when urban development and subdivision is proposed on highly productive land?

**Notes**

The highly productive land cannot be replaced once built on. The combined benefits need to be considered as outlined.

**Clause**

Should the policies extend beyond rural lifestyle subdivision and urban development to large scale rural industries operations on highly productive land? Why/why not?

**Notes**

Yes because the best soils are our "gold" and a sustainable future needs to be our goal.

**Clause**

Do any of the draft definitions in the National Policy Statement need further clarification? If so, how?

**Notes**

I commend and appreciate your efforts. Thank you!

**Clause**

Are there other key terms in the National Policy Statement that should be defined? If so, how?

**Notes**

I can comprehend it and would only be more stringent, which is impractical.

**Clause**

Should there be minimum threshold for highly productive land (i.e. as a percentage of site or minimum hectares)? Why/why not?

**Notes**

Yes, it is our nation's treasure.

**Clause**

Do you think a planning standard is needed to support the consistent implementation of some proposals in this document?

**Notes**

Consistency must be mandatory.

**Clause**

If yes, what specific provisions do you consider are effectively delivered via a planning standard tool?

**Notes**

The soil testing needs to be done to and by the same specifications.

**Clause**

What is the most appropriate and workable approach for highly productive land to be identified by councils? Should this be sequenced as proposed?

**Notes**

The shortest timeframes possible. Three to five years is too long when this was needed 10 years ago. As already stated there needs to be an embargo on the most crucial area(s) around Pukekohe.

**Clause**

What is an appropriate and workable timeframe to allow councils to identify highly productive land and amend their policy statements and plans to identify that land?

**Notes**

The above applies. Two years sounds maximum, if not immediately workable