

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

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### Clause

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

### Notes

Significant food growing hubs are located either close to major urban areas such identified in the NPS Urban development or adjacent to major transport corridors. The nature of the land includes the physical attributes of the soils and climate. This allows efficient movement of inputs for production as well as products from points of production to centres for consumption, processing, storage, manufacturing, and export. Further investment in the development of these hubs increases the productivity of the sector while maximising the natural advantages of the highly productive land they are located on.

### Clause

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

### Notes

Existing food production hubs have allowed the investment in infrastructure and support industries such as post-harvest and packing facilities, storage, logistics hubs, specialist merchants/suppliers as well as encouraging the development of training and employment opportunities in not only food production but also essential associated industries.

### Clause

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

### Notes

The present RMA framework does not provide sufficient clarity on how highly productive land should be managed with reference to the need to protect it when compared with development. This is evident by the loss of such land types to residential development which extinguishes the ability of future generations to make use of the resource. The alienation of productive land by subdivision into lifestyle blocks, then into smaller and smaller units creates more than direct access to land it also increases the issues with reverse sensitivity on land use which has not changed. The present systems do nothing to account for those issues.

### Clause

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

### Notes

The pressures associated with land development are unfairly weighted against existing land users who face many hurdles to continue with productive land use; as well as many financial incentives to sell up or develop land on the urban margins, or on land with amenity values that are attractive to lifestyle blocks. There is no weighting on land to remain productive in terms of the production of goods that cannot be easily imported (Fresh fruit and vegetables) without significant cost or increased biosecurity risks

### Clause

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

### Notes

Often there is inadequate consideration of the values and wider benefits of highly productive lands remaining in production. These are more than direct economic value generated off the land, but can also include the total economic activity generated by productive use of the land in terms of wages/salaries paid, economic activity due to inputs or outputs and maintenance of the land, the biodiversity in the environment from mixed land use and complementary cropping etc etc.

### Clause

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

### Notes

Urban development onto highly productive land typically involves a number of stages. The first being the ability to subdivide into lifestyle blocks. Reverse sensitivity issues then make land use more difficult, then as more lifestyle blocks are established so existing block will be converted to more intensive development until mass development occurs and the cycle starts again.. The slow creep of this form of alienation of land from being productive and transferred to housing is inefficient and haphazard.

### Clause

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

**Notes**

Future urban expansion should be included onto spatial plans and measures such as housing and business capacity assessments should be used to signal when additional land for urban growth is released provided that infrastructure is available. Where possible highly productive land with good transport and water access should be the last to be developed into urban areas and consideration should be given to moving to less valuable land first. What makes highly productive land attractive for development is the low cost of ground works due to flat/easy contour and free draining/stoneless soils. These features make the land ideal for food production Simple calculations such as economic activity per ha would always class highly productive land as generating more activity than a built structure over a 50y life when there is available housing stock available for the population to take advantage of.

**Clause**

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

**Notes**

In the area around Gisborne city there are an increasing number of lifestyle blocks beginning to fill in between areas existing small production land holdings (Small orchards, berryfruit, etc) Some of these involve the clearing of the productive capacity of the land to become pasture which then becomes housing in further rounds of development.

**Clause**

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

**Notes**

Highly productive land should be avoided for rural-lifestyle development where possible. Spatial planning for a region or area should be identifying those areas that are off limits to the the due to the land values in play. The promotion of these types of development onto less desirable land should be key to reducing pressure on productive operations on highly productive land. Moves onto highly productive land could be triggered by the outcome of Housing and Business Capacity assessments.

**Clause**

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

**Notes**

Provided that rules regarding discharges to air, water etc are being followed there should be no grounds for neighbours to object to activities on highly productive land. It may be necessary to include onto LIM reports that the land is adjacent to food production areas and that activities such as crop spraying, machinery work, fallow land etc can occur under existing land use provisions. Changing land use due to reverse sensitivity should be an economic decision by the land owner and not a forced choice due to a potentially vexatious neighbour. Consideration should also be given to changing planning rules to establish margins between productive land and residential use to reduce the opportunity for reverse sensitivity to occur. (Cycleways, reserves, community gardens etc)

**Clause**

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

**Notes**

Spatial planning would identify the highly productive lands and shape development to avoid those areas. TLAs could also include note on LIM reports regarding the existing uses of adjacent properties to include conventional horticulture, agriculture, or similar. Developments adjacent to highly productive lands could only be allowed subject to covenants being attached to the titles regarding a responsibility not to object to activities lawfully undertaken.

**Clause**

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

**Notes**

Yes this issue has been accurately reflected.

**Clause**

Are you aware of other problems facing highly productive land?

**Notes**

Access to freshwater resources, Nutrient budgeting limits for nitrogen, reverse sensitivity to noise/ spraying/ use of herbicides/ types of crops grown /crop rotation issues /land management issues such as stubble burning etc.

**Clause**

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

**Notes**

National Policy Statement due to the ability to insert aspects directly into plans to give effect to the most important aspects of the policy while allowing local authorities time to complete the full implementation of a new NPS

**Clause**

Are there other pros and cons of a National Policy Statement that should be considered?

**Notes**

Cons are that NPS expectations will take some time to be implemented and the different exposures of local authorities to housing pressures will shape what actions occur. This can be addressed by the NPS -UD reinforcing the key issues for highly productive land use.

**Clause**

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

**Notes**

None

**Clause**

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

**Notes**

NPS should focus on the broader issue of highly productive land due to the additional aspects of land value that are included with land that includes climate, access to water, transport hubs etc. To focus only on soils is to neglect that for land to be productive it will require inputs such as fertilizer, water, labour etc.

**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**

Primary food production has unique aspects that must be considered within resource use planning. Fruit and vegetable production require that the plants are feed and watered sufficiently to provide for bountiful yields. To ignore this factor will result in more land being needed to provide current food outputs let alone provide for population expansion. For vegetable and cropping production it is important that production can move across the landscape to avoid damaging the soil while maintaining the benefit of highly productive land.

**Clause**

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

**Notes**

Support that the scope of the NPS is on land planning issues. This approach provides some long terms stability especially in a hierarchy of tools where spatial planning allows for engagement on the future development plans before detailed planning where this NPS would have effect.

**Clause**

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

**Notes**

Significant area of land are under threat due to existing plans around major urban areas and unless some review of these plans was undertaken it is possible that large expanses of land will be lost to food production. To mitigate this risk the tools available to insert NPS statements directly into policy statements and plans without using the schedule 1 process should be considered. Given that the NPS will restrict land use the impact of less consultation in the short term from a lack of process will be offset by the improved protection of highly productive land.

**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**

Areas that are identified as future urban development should be covered in the NPS but areas already included in district plans as residential, industrial, or commercial could be exempted if the local council wishes and work has already commenced on the development of the land. Exemptions due to parcel sizes should not be included due to the ability to have highly intensive and high value production on land which is possible with future novel crops and production methods. The focus is preserving the future productive capacity of the land and this must take into account that future production methods and crops may be different to what is presently undertaken. Any land parcel exemptions would create a perverse incentive to alienate parcels into the exempt size and then develop them. This would then create reverse sensitively issues which risks other aspects of the RMA to be used to restrict operations on highly productive lands.

**Clause**

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

**Notes**

The NPS should apply nationally but the objectives should be already set to target areas under high pressure. This will mean areas with less pressure have more time to adapt to the change in regulatory settings.

**Clause**

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

**Notes**

The ideal outcome is that highly productive land is valued above buildings due to the food growing and life sustaining properties of the land. This value includes the economic activities due to supply of direct and indirect inputs into the products off the land and the subsequent processing and handling of those products. In doing so the future generations will understand that some decisions were made to accommodate the need to feed soils to maintain production while also allowing some production to be lost in order to serve community development needs

**Clause**

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

**Notes**

Using existing information such as LUC, climate data, S-Maps from Landcare research. Our local authority already has LUC as a GIS Layer and this can be further developed to allow analytics on individual land parcels

**Clause**

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

**Notes**

The proposed criteria are broadly based but local authorities are not experts in primary production and crop selection. Especially when precision horticulture and agriculture will alter production methods in the future. This will also influence the size of land to support primary production. A similar comment can be made about climate influences as production methods and climate requirements may change for crop and production methods in the future. ie the thought of Central Otago being a grape growing area 40yrs ago was unthinkable.

**Clause**

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

**Notes**

Pro for the protection of highly productive land is that it can be used for current or future production of food or goods in an effective manner.

**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**

There is a tension between this proposed NPS and the NPS UD however a balance can be struck between the two to ensure that highly productive land is only released for development should the Housing and Business capacity assessment values fall below preset limits. This balances the needs for urban development but not at the cost of productive capacity of the land. Also the NPS UD needs to also encompass reverse sensitivity issues during implementation to minimise the risk of land be alienated for productive uses but neighbour concerns.

**Clause**

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

**Notes**

Spatial planning should have already foreshadowed areas that may be considered for expansion but only only Housing and Business capacity assessment values have triggered land release to facilitate development

**Clause**

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

**Notes**

Rural subdivision is a concern due to the issues that are created such as reverse sensitivity, fragmentation and subsequent alienation of productive activities off the land. Subdivision needs to be encouraged on alternative low value land where possible and again this links to the spatial planning that local authorities should complete in shape and inform choices regarding land use. Both suggestions of minimum lot sizes for subdivision along with the amalgamation of small titles would serve the interests of improving access to highly productive land, especially in areas where historic townships have not been created.

**Clause**

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

**Notes**

The NPS can manage reverse sensitivity effects by ensuring any developments on Highly productive land includes buffer strips and management plans for the development to mitigate the impact of spraying, cultivation, odour (field crops) and noise that can be generated by use of highly productive land.

**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**

Private plan changes should be rejected if not aligned with anticipated growth areas identified in spatial planning by the local authority. This should be inserted directly to minimise the risk of land being obtained before the NPS comes into full effect.

**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 NPS should be a backstop to the NPS UD in order to avoid development patterns that do not support effective use of urban infrastructure such as water, power, sewerage, transport corridors etc. Development in the peri-urban margins should not be allowed to gradually erode the areas of highly productive land available for use.

**Clause**

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

**Notes**

Advantages of identifying highly productive land spatially is that it would only need to be completed once

**Clause**

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

**Notes**

Regional identification would be most logical due to the resources needed and that the issues for the land are region in terms of water access, climate, etc

**Clause**

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

**Notes**

Unknown but much of the information for flat areas is already available in data that probably needs to be linked up

**Clause**

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

**Notes**

Erosion prone land may not be suitable for some production activities so a LUC of 3E and below. Limitations with LUC subclasses W,S and C can be mitigated by crop selection, production method and crop rotation.

**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**

The future availability of water needs to be considered when identifying highly productive land. As the water resource gets improved management it is possible that more areas can be developed into more intensive production. Precision horticulture can be a future with more production using less resources than at present and this future should no be ignored

**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**

Then range of crops that can be produced on each of the different classes, however all need protection in order to encourage the most effective use of each land type. There is little point in only protecting a single LUC class if it means lower input broad acre crops are grown on land which is naturally suited for intensive vegetable production.

**Clause**

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

**Notes**

The definition of highly productive land being 50% OR 4ha is clear and easy to interpret

**Clause**

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

**Notes**

The productive capacity includes the term most economic output is based on existing capacity of the land and ignores the ability to modify and improve this output with irrigation, structures or production techniques. This is an area where the NPS Fresh water will have an intersection.

**Clause**

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

**Notes**

Minimum threshold should be 1ha due to that some very productive enterprises on small scale can operate down at this level.

**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**

No issues with what has been included in the discussion document

**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**

For Gisborne it means the region would meet the 3 year limit. Given that the LJC is already mapped across the country there is no reason for Local authorities not to commence aspects of the NPS much sooner 2 years