

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

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**Reference no:** 20

**Clause**

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

**Notes**

Less dependence on imports of food. Consider food growing as faring. Do not include non-food growing activities such as vineyards, forestry and similar as " (food) farming"

**Clause**

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

**Notes**

Self (NZ) control over quality assurance and any adverse effects on the environment, locally and nationally.

**Clause**

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

**Notes**

No. Why are vineyards not segregated as a non-food form of farming.

**Clause**

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

**Notes**

No. Highly productive should refer to value as a food source, not as a means of revenue gathering such as viticulture and forestry.

**Clause**

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

**Notes**

In Marlborough, and presumably elsewhere in NZ, vineyards are considered by MDC as just another form of farming. As there is no food value in viticulture generally, discriminate as a non food form of agriculture and limit the uncontrolled expansion of vineyards, especially to overseas corporates.

**Clause**

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

**Notes**

Consider a balance. Blenheim is a bad example of how not to incorporate urban expansion at the cost of lost productive land. In this particular case,productive (food) land has been lost to viticulture and more recently to urban and business expansion.

**Clause**

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

**Notes**

Primary importance. Self sufficiency in all food production except exotic and alcoholic products.

**Clause**

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

**Notes**

At government level initially. Local councils do not appear to have any say if viticulture expansion and its associated environmental problems in Marlborough is considered.

**Clause**

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

**Notes**

By government leadership and providing guidance for councils.

**Clause**

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

**Notes**

Agree, but include non-food production (viticulture etc) as a separate issue.

**Clause**

Are you aware of other problems facing highly productive land?

**Notes**

Yes. Marlborough, Auckland, Nelson Tasman for example have lost a lot over the 50 or so years I have lived here. My general observation.

**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**

Food production primarily.

**Clause**

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

**Notes**

Yes. It should not be left up to councils to extrapolate New Zealand's long term self sufficiency goals. They need better guidance and resources.

**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

**Clause**

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

**Notes**

Both

**Clause**

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

**Notes**

Self sufficiency in food . Better environmental controls.

**Clause**

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

**Notes**

Government and consultation in areas identified as highly productive and/or potentially highly productive. Non food production should be considered as a secondary issue.

**Clause**

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

**Notes**

Include rivers and in particular alluvial soils.NZ has a large number of braided river systems providing soils and water.

**Clause**

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

**Notes**

Self sufficiency in food. No cons if the "bigpicture" is considered in the early stages to identify an economic/social balance between competing issues. 9 population growth, food sullivan, shelter, industry..)

**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**

Yes. Forestry, viticulture, housing, environmental issues, transport etc

**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**

Talk to each other - in the interest of the long term survival of NZ population.

**Clause**

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

**Notes**

Primary importance

**Clause**

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

**Notes**

Redirect away from productive to less productive land.

**Clause**

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

**Notes**

Environmental controls through a "revised" RMA that addresses current and future issues. The existing RMA is 30 years old, in which time NZ population has increased significantly and in distribution.

**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**

Prioritize

**Clause**

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

**Notes**

Prioritize

**Clause**

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

**Notes**

A complete review of what constitutes farming for local food production / consumption. Exclude "farming" where the prime reason is export lead- viticulture and forestry for example. Overseas developments will mean that such industries will be less likely to compete long term using NZ's so called "clean green" image as a sales pitch.

**Clause**

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

**Notes**

Prioritise

**Clause**

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

**Notes**

Contaminate land.

**Clause**

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

**Notes**

Prioritise

**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**

More guidance

**Clause**

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

**Notes**

National, regional.

**Clause**

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

**Notes**

Most of it has already gone or is being developed for viticulture in Marlborough.

**Clause**

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

**Notes**

I think they already know, but viticulture gets better returns than food production.

**Clause**

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

**Notes**

Yes

**Clause**

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

**Notes**

Food production and water supplies. Transport to and from ( NI to SI eg)

**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**

No benefits. Marlborough is, I understand, already under water stress. Councils cannot predict weather (eg 2018) which puts all farming and the population at risk

**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**

Yes

**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**

Mandate

**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**

Mandate

**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. through a revised RMA

**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 Benefits of scale

**Clause**

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

**Notes**

RMA and Building Act

**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**

Maybe define who you mean by decision makers. Marlborough has been at the mercy of large overseas companies in the viticulture and forestry fields

**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. The whole of NZ long term is vulnerable

**Clause**

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

**Notes**

A clear listing and definitions on what is "productive food land" important to the well being of NZ population long term - not short term financial gain.

**Clause**

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

**Notes**

No Even domestic gardens become important under adverse conditions. Earthquake in CCH limited fresh fruit and veg supplies to Marlborough; small community allotments in UK after 2nd World War enabled poorer people to get fresh produce.

**Clause**

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

**Notes**

Yes

**Clause**

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

**Notes**

Could be a mandatory standard such as a NZ Standard or eg; a group of standards such as ISO 9000 quality management standards.

**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**

Immediate. It is already too late in some areas of NZ

**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**

Start asap, finish asap