

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

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## Reference no: 25

### Clause

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

### Notes

Existing food growing hubs have beneficial values through: Access to available irrigation water, suitable climates which are generally frost free with regular rainfall, suitable topography and soil structure where the soils can be repeatedly cultivated, access to transportation, access to labour. The existing hubs can be maximised through national and regional protection for primary rural production and national, regional and district policy protection from inappropriate use and development. Enable food security for successive generations.

### Clause

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

### Notes

Highly productive land provides better returns on investments through: higher yields per hectare from vegetable production, secure access to irrigation water, less chemical and nutritional inputs from the use of agrichemicals and fertilisers due to better soil structure and climatic conditions, less environmental effects from reduced chemical and fertiliser inputs, repeat and sustainable cultivation practices and the long term sustainability for future production.

### Clause

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

### Notes

No. The RMA requires the management of highly productive land at regional and district council level. Regional and district council's have objectives and policies which are not governed at a national level. The regional and district councils do not have a mandate to protect highly productive land at a central government level. All regional and district councils have differing objectives and policies for the use and development of the highly productive land.

### Clause

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

### Notes

No. Regional and district councils are responsible for setting objectives and policies at a regional level. The regional and district council objectives and policies are reviewed under regional plan changes.

### Clause

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

### Notes

There is not enough consideration given to the values and benefits of highly productive land at regional and district council planning and consenting processes. Regional and district councils need a National Policy Statement protecting the inappropriate use and development of highly productive land for setting their objectives and policies in planning and consenting processes. Regional and district councils need to consider the primary production on highly productive land as a regional and national significance for the economy. Regional and district councils need to consider the loss of highly productive land as a significant effect to the environment and a threat to national food security.

### Clause

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

### Notes

Urban expansion has priority over highly productive land. Affordable housing takes preference over food security. Example: Belmont residential subdivision in Pukekohe was approved under the Special Housing Area Act. The Belmont residential subdivision is built on class 1 LUC soils.

### Clause

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

### Notes

Highly productive land should be awarded national significance status for food security. Food security should take preference over future urban expansion.

**Clause**

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

**Notes**

Highly productive land is not considered in the planning and consenting processes for rural-lifestyle development. Most regional and district councils allow dwellings and commercial sheds to be built on highly productive land. Regional and district councils do not set conditions which would preclude rural life-style living on highly productive land. Regional and district councils do set policies and grant consent for specific non rural activities to locate and operate on highly productive land. Example: multiple land use consents granted at 41 & 53 Eden Road Pukekohe. All consented activities at these addresses are located on class 1 LJC soils.

**Clause**

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

**Notes**

Highly productive land should be considered a permitted activity for primary production without the need to consider an assessment of environmental effects on rural life-style development. Primary production should not need to consider the adverse amenity effects and values of rural life-style developments.

**Clause**

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

**Notes**

Primary production should be considered a permitted activity within regional and district councils without conditions imposed other than best management practice.

**Clause**

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

**Notes**

No further life-style development to be consented by regional and district councils. Regional and district councils to set policies for primary production as permitted activities without conditions and without the need for an assessment of environmental effects. Buffer zones to be set between residential and rural zoning.

**Clause**

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

**Notes**

Yes. Yes this document comprehensively reflects all the issues concerning primary production on highly productive land.

**Clause**

Are you aware of other problems facing highly productive land?

**Notes**

Effects on the environment for farm nitrogen capping and fresh water policies around best management techniques for sediment control and nutrient run-off into healthy waters.

**Clause**

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

**Notes**

National Policy Statement. All regional and district councils will be required under the NPS to set unified regional policies and objectives for the protection of highly productive land.

**Clause**

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

**Notes**

The pros for a National Policy Statement are the duration for which the National Policy Statement has effect.

**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 land. Highly productive land defines primary production in context more specifically. Versatile soils is more ambiguous.

**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. Food production is a matter of national significance. New Zealand needs food security through food production.

**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.

**Clause**

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

**Notes**

Smaller parcels of land under four hectares should not be considered unproductive land and not excluded from the NPS. Excluding smaller parcels of land under four hectares would encourage regional and district councils to grant consent for these smaller parcels of land as rural-lifestyle developments with a net result of further fragmentation and loss 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**

No. Some future urban growth is already earmarked for development on highly productive land. By releasing the NPS for the protection of highly productive land these highly productive land parcels could be reallocated protection status from future development.

**Clause**

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

**Notes**

Nationally.

**Clause**

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

**Notes**

Food security. Investment in technology and infrastructure. Financial security. Farm generation succession.

**Clause**

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

**Notes**

By using the LUC (Land Use Capability) classification system. All regional and district councils must recognise and incorporate the LUC classification system into their district plans, policies and objectives.

**Clause**

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

**Notes**

C. The size and cohesiveness of the area of land to support primary production should not be limited to larger parcels of land 4 hectares and greater. Smaller parcels of land less than 4 hectares could provide specialist types of intense vegetable production economically and sustainably. Smaller parcels of highly productive land could also be amalgamated together by adjoining properties to create larger parcels of highly productive land. By recognising smaller parcels of highly productive land less than 4 hectares remain productive would prevent further fragmentation of highly productive land.

**Clause**

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

**Notes**

The pros of prioritising highly productive land for primary production would guarantee food security at a national level for sustained primary production for intergenerations.

**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**

The National Policy Statement on Urban Development has the potential to conflict with the National Policy Statement on Highly

Productive Land. Councils need to recognise that urban development should be avoided around highly productive land and councils should consider that urban development is incompatible with primary production and to consider other options for urban development.

**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**

The National Policy Statement for Highly Productive Land and the National Policy Statement for Urban Development should recognise the two policies are incompatible with each other.

**Clause**

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

**Notes**

Highly productive land should maintain priority for protection over urban expansion.

**Clause**

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

**Notes**

To set policies and objectives to protect the productive capacity of highly productive land.

**Clause**

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

**Notes**

To restrict or prevent certain sensitive or incompatible activities not based on or related to rural production on or adjacent to 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**

The National Policy Statement should set decision-making guidelines that the productive capacity of highly productive land is to be protected and that the urban or rural lifestyle plan changes are incompatible with highly productive land and primary production.

**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 National Policy Statement decision-making guide should take into account the threat to national food security from the elimination in productive capacity of highly productive land when considering rezoning of highly productive land for subdivision and urban expansion.

**Clause**

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

**Notes**

In the interests of New Zealand's national food security planning.

**Clause**

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

**Notes**

The National Policy Statement is a mandate which all regional and district councils must incorporate into their policies and objectives for resource consents and planning.

**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**

Yes. The RMA process is too complicated and time consuming process. for immediate effect The NPS should bypass the RMA process.

**Clause**

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

**Notes**

No area of highly productive land should be excluded.

**Clause**

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

**Notes**

In the interests of New Zealand's national food security.

**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**

The objectives should include ; "inappropriate subdivision, use and development NOT BASED ON OR RELATED TO PRIMARY RURAL PRODUCTION" from occurring on highly productive land.

**Clause**

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

**Notes**

There are no cons.

**Clause**

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

**Notes**

National level. All councils at district and regional levels must use the same classification system relevant to highly productive land throughout the country to eliminate discrepancies in assessments from region to region.

**Clause**

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

**Notes**

Onsite analysis of soils.

**Clause**

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

**Notes**

Yes. To make sure no more interim loss of highly productive land occurs until the National Policy Statement is gazetted.

**Clause**

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

**Notes**

Key considerations are LUC classification, availability of irrigation water, topography and climate.

**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**

Benefits of future availability of water to highly productive land will enable sustainable and economic productive capacity of highly productive land.

**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. LUC 1+2 are more highly productive for intensive and financially lucrative vegetable cropping production.

**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**

Council must assess the effects of urban development on the risks to national food security from the potential loss of highly productive land to urban development.

**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**

By including a section in the National Policy Statement that: All regional and district councils must assess the effects and costs associated with a national food security risk with the loss of highly productive land to urban development.

**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**

By directing subdivision development away from areas of highly productive land.

**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. Amalgamation of small titles will allow highly productive land to be more efficient and manageable. Amalgamation of titles will also reduce reverse sensitivity from neighboring areas from occurring. Amalgamation of small titles will prevent further fragmentation and loss of highly productive land.

**Clause**

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

**Notes**

By the creation of buffer zones between primary production and urban residential, industrial and commercial zones.

**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.

**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**

Decision-makers must take into account the permanent loss of primary production to the economy, the effects on the environment and the national food security risks associated with the loss of highly productive land to urban development.

**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. Rural industries are a threat to the loss of highly productive land. Many industries claim by definition to be rural based industries. In reality only a small percentage of their business activities ( less than 50%) are primary production related. Restricting rural industries through council objectives and policies from locating and operating on highly productive land will ensure planners and consultants do not deceptively misinterpret urban industries as rural industries.

**Clause**

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

**Notes**

Policy 1. Appendix A: c. the size and cohesiveness of the area of land to support primary production should be omitted.

**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. Some smaller adjoining parcels of land could be amalgamated together to form a larger parcel of highly productive land.

**Clause**

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

**Notes**

Yes. Some regions and districts have a high percentage of highly productive land contributing to the primary producing industry and these areas should take preference over regions and districts with less percentage of highly productive land and not contributing as highly to the primary producing industry.

**Clause**

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

**Notes**

Councils to assist with implementation and focus efforts where the pressures on the highly productive land are greatest.

**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**

Councils should identify highly productive land under the LUC 1-3 classification system

**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**

2 years