

Your submission to Proposed National Policy Statement for Highly Productive Land

Craig Ross, **Craig William ROSS**

Manawatu
New Zealand

Reference no: 28

Clause

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

Notes

Supplying fresh vegetables and fruit to New Zealanders and exporting surpluses overseas - using LUC Class 1 & 2 (& 3e for the Pukekohe area) Land with versatile, high quality soils, in particular. When the RMA replaced the Town & Country Planning Act in 1991, there has practicably been little or no protection of economically viable areas (that are predominantly around urban areas) of our most versatile soils for food production. NZ'ers have not heeded the lessons from history for the future where civilizations have eventually failed because of their mismanagement of their best food-producing lands and need to conserve these for the growing world population: e.g., "Out of the Earth: Civilization & the Life of the Soil" by Daniel J. Hillel 1991: The Free Press, Macmillan Inc. NY; "Soil & Humanity: Culture, Civilization, Livelihood & Health" by K. Minami.2009: Soil Science & Plant Nutrition 55(5): 603-615; "Food Security in a Changing Climate" by R. La 2013: Ecohydrology and Hydrobiology 13:8-21. "Feed or Feedback: Agriculture, Population Dynamics, & the State of the Planet" by A. Duncan Brown 2003: International Books, Utrecht, The Netherlands; "Feeding a World Population of More than Eight Billion People: A Challenge to Science" J.C. Waterlow, D.G. Armstrong, L. Fowden, R. Riley (eds) 1999.

Clause

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

Notes

Highly productive land LUC classes 1 & 2 (& 3e for the Pukekohe area) in NZ tend to mostly surround urban areas, thus are close to the biggest areas of population. The key here is vegetable production (market gardening). Class 1 & 2 land/ high quality versatile soils close to markets require less resources (e.g., water supply/irrigation, drainage, fertilizers, tillages, transport, labour) to produce sustainable, intensive vegetable production than poorer quality land/soils (Classes 3 & >). They are also in short supply (5% of NZ's land) &, according to Rutledge et al.)2010:"Thought for Food: Impacts of Urbanisation trends on soil resources available in New Zealand" In Proceedings of the NZ Grasslands Assoc. 2010. Vol, 72. p 241-246) "If '(peri &) urbanisation' trends continue, a large proportion of LUC Class 1 and 2 lands could be lost to agricultural production over the next 50-100 years." So these lands are endangered with respect to future intensive vegetation production. The end result being the NZ will need to rely more and more on imported fresh vegetables (& possibly fruit). A very unfortunate future for a food-producing nation!

Clause

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

Notes

No - precedence is that Council's around the country have different approaches in their Plans. Developers and individuals have gained urban and lifestyle block developments irrespective of whether it's Class 1 & 2 land. This has led to the extinction of significant areas of Highly Productive Land to urban and lifestyle developments over the 28 years of the RMA - that's the reality. Andrew & Dymond 2013 reported that 10.5% of LUC Classes 1 & 2 Land was extinguished from actual or potential food production by urban and lifestyle developments over an 18 year period (1990 to 2008). These losses of our best soils for vegetable production become cumulative over time.

Clause

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

Notes

No - priority seems to be given to short-term economics, connectivity of urban and peri-urban infrastructures and the pressing need for housing for our population growths around urban areas, in particular. Which also tend to be where Class 1 & 2 Land is concentrated.

Clause

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

Notes

Well down the list of priorities.

Clause

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

Notes

Patchy - until recent changes to the Palmerston North City Plans, urban expansion and lifestyle developments were allowed onto Class 1 & 2 Land when there viable alternative areas on poorer quality land on Class 3 Land on higher terraces. Urban encroachment on market garden land around Pukekohe is well documented. The best market gardening land around Christchurch City has gradually been urbanized or divided into smaller blocks when there is ample stony and shallow soils in the vicinity for subdivision. The Rolleston Development is to be applauded!

Clause

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

Notes

Where there are viable choses, priority should be given the lower quality land / soils. e.g., Palmerston North urbanization and lifestyle developments should be preferentially directed to Class 3 land on the terraces, leaving Class 1 & 2 land for potential agricultural and horticultural uses. Auckland urban and peri-urban development should be direct to the north on poorer quality land and on poorer land south of the Pukekohe/ Bombay Hills area. The Pukekohe Area is unique in NZ - it is the only area where intensive market gardening (multiple crops and tillages every year) has been sustainably practiced for over 100 years. Its resilient soils and climate make it unique. On other Class 1 & 2 land in NZ, market gardening requires ley spells in pasture to recover soil structure and climate constraints limit multiple cropping in many other areas.

Clause

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

Notes

See above

Clause

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

Notes

Yes - but from the point-of-view of whether these are likely to be the beginning of a progression to urbanization and whether they become too small to be economically viable for significant food production enterprises.

Clause

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

Notes

By planning rules that avoid activities that are obviously incompatible.

Clause

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

Notes

Challenging - but there will always be a boundary between the urban and rural interface that creates interface sensitivities from both sides of the boundary.

Clause

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

Notes

Yes - mostly reflected in this document. BUT it focuses on the short-term. It needs to take a longer-term view - like Climate Change. What legacy are we leaving beyond our children, when the NZ population reaches 6, 7, 8 million. Will they have to rely on imported or hydroponic food or highly processed microbes or algae?

Clause

Are you aware of other problems facing highly productive land?

Notes

Absolutely - I've been involved in a number of Planning and Court Hearings on the subject!

Clause

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

Notes

A National Policy Statement that directs local authorities to protect highly productive land from urban and lifestyle development when there are alternative options for these development on poorer land. This is the best option as it places an emphasis for local authorities to pay more weight than previously. And can be implemented relatively quickly.

Clause

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

Notes

Obviously - as stated in the document.

Clause

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

Notes

No LUC Classes 1 & 2 & Class 3e for the Pukekohe area. Class 3 land represents about 10% of NZ's land area and is not in short supply. If Class 3 Land is universally included as worth protecting for primary production, then most of the Canterbury Plains should not be urbanized or be subdivided for lifestyle blocks. Clearly unpractical!

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

Should focus on intensive vegetable production (market gardening). Land for vineyard development is not in short supply and anyway, it is not an essential for our wellbeing, other than export earnings! Land suitable for fruit and nut trees is also not in short supply, although climate plays a more important role, as does water supply for irrigation. Certainly poorer quality soils can sustain fruit and nut trees. Maybe cases can be made to protect land suitable for fruit and nut tree cropping in some provinces.

Clause

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

Notes

Focus especially on targeted areas. Pukekohe for one! Hawkes Bay is another area. The Market Gardening lands around Christchurch and Oamaru. The flood plain Class 1 & 2 Lands in the Manawatu, Waikato, Nelson, Blenheim, Otago, Taranaki, Bay of Plenty, East Coast Regions.

Clause

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

Notes

That sufficient areas of highly productive land are conserved for actual and potential food production that allow for population growth into the 23rd Century.

Clause

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

Notes

Yes - by Regional Councils using existing information from Manaaki Whenua and MPI

Clause

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

Notes

Climate, Soils and Topography are the key criteria - as they are considered in the LUC Classifications. Areas that have been identified as future urban zones in district plans should be reviewed in light of the higher priority given the Highly Productive Land than under the RMA.

Clause

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

Notes

Already covered

Clause

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

Notes

The flexibility should be based on whether or not there are viable alternatives to directing urban and lifestyle developments onto LUC Class 3 or higher land

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

Focus on districts and major urban centres where there are moderate to high proportions of Class 1 & 2 Land , or Class 3 Land that is particularly important for intensive food production (excluding pastoral uses)

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

Timeframes look reasonable