

Your submission to Proposed National Policy Statement for Highly Productive Land

above, **Mike Patrick**

Tasman
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Reference no: 29

Clause

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

Notes

difficult, as land-use changes away from productive land (horticulture, agriculture) into for example dairying means less productive land, requiring more intense use, and therefore more use of fertilisers, water etc

Clause

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

Notes

We need to be able to feed ourselves! If we can't, we're at the mercy of those from whom we import food

Clause

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

Notes

no! The old Town & Country Planning Act specifically states that a matter of national importance was the protection of such land from inappropriate subdivision and use. Whilst s 5 of the RMA has a something similar, it's a wishy-washy statement (despite being in s 5), and doesn't seem to be given effect to in many areas around NZ - it's "traded off" against other competing uses such as urban and lifestyle block subdivision

Clause

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

Notes

no. see above

Clause

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

Notes

bugger all

Clause

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

Notes

often not much - look at the Waimea Plains here in Tasman

Clause

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

Notes

highly productive land should be retained for what it is. BUT of course, what happens when the land-owner wants to retire/sell?

Clause

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

Notes

not well at all. Prime examples all over the Tasman District. Neighbours' kiwifruit orchard a good case in point

Clause

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

Notes

of course it should!

Clause

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

Notes

see below

Clause

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

Notes

reverse sensitivity should never have entered the lexicon, let alone be accepted as a valid RMA consideration. get rid of it totally, not just with this issue. What ever happened to caveat emptor?? Amend the RMA in line with the T&CP Act

Clause

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

Notes

doesn't happen throughout NZ, but it very much is an issue down here (and in other areas where highly productive land occurs as a significant percentage)

Clause

Are you aware of other problems facing highly productive land?

Notes

the need for intensification, and hence need for more water, fertilisers, sprays, etc etc

Clause

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

Notes

NPS PLUS amending the RMA in line with the old T&CP Act

Clause

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

Notes

no comment

Clause

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

Notes

see above re amending the RMA

Clause

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

Notes

as broadly as necessary to ensure that we can feed ourselves

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

general, excluding intense dairying

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

exclude the proposed "out" for Councils, proposed Policy 3

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

separate NPS is it not?

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

NPS pretty much as proposed (but see above re Policy 3) along with amendment of the RMA

Clause

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

Notes

LUC, pity we still don't have the old Lands & Survey Dept! **NATIONALLY** classified, not by conflicted Councils!

Clause

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

Notes

yes

Clause

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

Notes

we need to be able to feed ourselves

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

not if you manage these interface issues properly. The main potential issue I see is between this proposed NPS and the proposed new freshwater agenda

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

ensure that Councils, and their retarded reverse sensitivity constituents can't prevent urban intensification within existing urban boundaries for a start!

Clause

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

Notes

taking priority. And getting rid of reverse sensitivity. See above

Clause

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

Notes

as per urban expansion into productive land - although if you "legislate" against an owner of productive land wanting to feather his retirement nest-egg with a subdivision, you may be landed with a compensation issue

Clause

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

Notes

get rid of the bloody concept, in TOTAL, not just in terms of this proposed NPS!

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

"guide" is too light a word - REQUIRE!

Clause

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

Notes

ditto

Clause

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

Notes

central government's big stick!

Clause

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

Notes

see above

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. see all of above

Clause

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

Notes

Stick to those areas of land classified as the top 3 -4 LUC classes as proposed

Clause

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

Notes

direction!

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

again, "guidance" is the wrong word - this is a proposed NPS, so it should be directive, surely

Clause

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

Notes

see all ove above

Clause

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

Notes

NATIONAL. I don't trust regional and especially district councils one iota

Clause

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

Notes

bugger all - we pretty much know them already

Clause

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

Notes

see above

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

no comment

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's up to you guys to sort this potential issue out (see above)

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

no comment

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

no comment

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

up to you guys to sort it out, but see above re councils and the reverse sensitivity issue

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

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 in part. But what about water and fertiliser use issues?

Clause

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

Notes

see above. Grrr.....

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

there should be no ability for trade-offs

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

depends upon what industries you're talking about. Forestry and dairying yep, other (chicken ranches, piggeries etc) OK

Clause

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

Notes

nope

Clause

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

Notes

define reverse sensitivity

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

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

pass

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

OK, LUC 1 and 2 in the first instance, immediately (they should have these data already).

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

one year