

# 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

Contribution to the economy of an often marginalised rural and regional district. Hubs support ongoing social and cultural connections for whanau, farmers, food producers working and living on these lands for generations. Supports ongoing food security for local and national markets. Optimisation requires Improving transport networks including by rail, road, air and water for Kaipara's food and primary producers. Also need to urgently address climate change impacts and the potential inundation of fertile floodplains with salty water or water shortage because of increased droughts and impacts from extreme weather impacts. More training and educational opportunities needed for youth to support jobs in the food production industry and improve primary production practices and encourage a sustainable future in Kaipara. More support provided to Māori kaitiakitanga and food production businesses. Extensive education and awareness raising of developers, surveyors to improve their appreciation for HPL especially in coastal settlements like Mangawhai.

### Clause

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

### Notes

Recognition of importance of local food production to regional, national and international food security. Ongoing opportunity to improve food production practices at a local and regional scale. Continued opportunity to build on existing food production knowledge and experience in Kaipara. Ensures future generations consider land use capability and need to protect areas for food production. Also supports existing rural amenity values held in high regard in rural communities of Kaipara.

### Clause

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

### Notes

In general we agree with the problem statement as there is evidence fragmentation and urban sprawl is encroaching on HPL, especially in Mangawhai in Kaipara. More consideration is needed on the adverse impacts of climate change on highly productive lands and what RMA requires if there is a need to set aside other currently less productive lands for future primary production. This is especially important in the Kaipara should HPL in Ruawai be lost to flooding and sea level rise etc.

### Clause

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

### Notes

No, including forestry in primary production may lead to perverse outcomes, especially if soil degradation results and food crops are due to unforeseen climate change events or as a result of bad growing seasons.

### Clause

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

### Notes

In Kaipara district as part of comprehensive District Plan review through constraints and opportunity spatial mapping for key urban development areas. The Kaipara Kickstart PGF project is focused on developing future innovative and diversification of HPL use in Kaipara, including improved water storage and transport networks. New provisions will be developed for the District plan to clearly delineate rural production zone from rural lifestyle zone and control use through permitted or non complying activities.

### Clause

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

### Notes

As per above through spatial planning and mapping areas that are HPL in Kaipara as less suitable for urban development.

### Clause

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

### Notes

Mapped and protected in regional and district plans, policies and strategies.

**Clause**

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

**Notes**

By determining lifestyle property size and what land use activities are permitted in a rural lifestyle zone.

**Clause**

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

**Notes**

What makes land productive and viable could depend on a range of factors depending on what crop or food is being produced and whether it is for local, regional, national or international consumption. Important to look at source of water, health of soil and surrounding natural vegetation and biodiversity, weed and pest control, transport networks, labour supply, climate change threats, associated educational and training facilities, population growth in an area.

**Clause**

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

**Notes**

Education on zoning and establishment of buffer zones especially ecological corridors. District plan provisions.

**Clause**

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

**Notes**

Buffer zones.

**Clause**

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

**Notes**

Yes this is a problem, more attention to climate change threats and opportunities especially where HPL are likely to be lost to sea level rise and salt water intrusion as in Ruawai.

**Clause**

Are you aware of other problems facing highly productive land?

**Notes**

Climate change, poor transport links, education and training not available to build local youth capacity, ageing farming demographic and lack of succession planning or lack of interest by next generations to work the land, legislative and institutional barriers preventing Māori land development, city retirees moving to coastal and rural settlements.

**Clause**

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

**Notes**

More broadly to ensure Class 1,2 &3 lands lost to climate change adverse impacts are able to be replaced with other classes of land that with improvements, innovative practices, technology or a range of other actions can successfully provide future crops or food.

**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, future proofing with strategic planning is supported. However it is important to describe/define what a strategic planning process will entail. District plans are reviewed every 10 years and are very slow to address cultural, social, economic and environmental changes and priorities. Whilst a good tool to support the protection and optimisation of HPL they are not the most efficient. Scope is somewhat unclear. Whilst there seems to be an inherent focus on cropping land (class 1-3 soils), the definition of primary production includes plantation forestry. This may lead to forestry being 'enabled' on HPL and / or areas of high producing grassland better used for food production. Forestry is not under the same threat from fragmentation / urban expansion as high quality soils are and has far more options in terms of location / land quality.

**Clause**

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

**Notes**

Climate change considerations, constraints and opportunities informed by HPL risk and vulnerability assessments.

**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 they should be considered within a strategic policy and planning process where possible.

**Clause**

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

**Notes**

yes

**Clause**

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

**Notes**

Thriving local economy of Kaipara, supported Māori primary production businesses, adequate education and training for youth in Kaipara, strategic alignment of district, regional and national planning instruments, extensive awareness amongst developers of the need to protect HPL

**Clause**

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

**Notes**

Mapping and ground truthing by central government funded scientists in collaboration with local and regional government authorities, primary production industry and Mana Whenua

**Clause**

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

**Notes**

Yes, need to include climate change threats and opportunities also, especially when fertile alluvial soils are under threat of flooding and sea level rise.

**Clause**

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

**Notes**

Pros: provide food security at a number of market levels, supports local economies and rural functions Cons: ignores climate change threats and opportunities for primary production on soils/lands of less quality

**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 sure, would need to make sure urban capacity development is informed by constraints and opportunities mapping highlighting HPL resources and future productive lands to address climate change impacts. Certainly Auckland's growth and impact on HPL should not be underestimated in terms of this elevating the value and importance of Kaipara's HPL.

**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 the measuring and mapping of land use capacity is built into policies

**Clause**

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

**Notes**

As a constraint to urban expansion.

**Clause**

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

**Notes**

Support district and regional plans to make subdivision and fragmentation on HPL a non-complying activity

**Clause**

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

**Notes**

Buffer zones and education of neighbouring landowners

**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**

Create some high hurdles to jump and bottomline offsets consisting of like for like in same district

**Clause**

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

**Notes**

Provide direction whether local and regional government authorities need to implement a planning regime that prohibits subdivision and development on HPL

**Clause**

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

**Notes**

Clear timeframes for implementation, definitions glossary, guidance for private plan changes and resource consent applications, criteria relied upon to determine if land is HPL, information is relevant to Māori, description of cumulative impacts of loss of HPL in Aotearoa and across the globe -the big picture setting

**Clause**

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

**Notes**

Criteria for HPL identification in Appendix A are open to interpretation, some flexibility is supported but criteria and maps will be scrutinised by affected landowners so more certainty likely needed. Support identification of HPL at regional level, rather than just district scale, for consistency and process efficiency. Each district however will need to ground truth identified HPL as part of regional exercise. NPS must support ability for district councils to 'tweak' RPS maps of HPL provided consistency in methodology for identification. Our experience with previous mapping exercises eg Significant Natural Areas, Outstanding Natural Features shows it is inevitable that omissions / errors will occur at a regional scale.

**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, risk is community backlash. Benefit - stops floodgates opening where developers rush to put in private plan change or resource consent applications to subdivide HPL

**Clause**

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

**Notes**

Waahi tapu, archaeological sites,

**Clause**

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

**Notes**

Clear direction needed

**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**

Yes to provide certainty

**Clause**

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

**Notes**

Pros -provides better planning tools for future growth and infrastructure investment, can help to identify climate change threats and opportunities up front,

**Clause**

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

**Notes**

Regional for reasons stated previously but ground truthed at a local scale

**Clause**

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

**Notes**

GIS and land management expertise Costs of plan change process Engagement costs associated with working with our communities, Mana Whenua, affected landowners, primary producers, and developers

**Clause**

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

**Notes**

Workshop with councils the science behind the criteria and the mapping methodology to be used to identify HPL

**Clause**

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

**Notes**

Holistic approach is best bringing together natural physical components with the cultural and social components. Need to ensure climate change analysis applied also.

**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**

As per above comments, without water land unlikely to be productive. Landbanking opportunities to be considered in anticipation of water storage and capture.

**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.

**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**

Mapping and education of developers.

**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**

Make sure each share same definitions where relevant and timeframes for implementation align. Don't permit development to out trump food production.

**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**

No.

**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.

**Clause**

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

**Notes**

Infrastructure design and buffer 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**

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, leave no stone unturned.

**Clause**

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

**Notes**

Yes primary production and inclusion of plantation forestry. Strategic planning process needs better definition.

**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 this will become a legal argument to undermine value of HPL.

**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**

Colour code for HPL maps

**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**

yes

**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**

6 to 12 months