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



## Reference no: 38

#### Clause

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

Currently the RMA framework seems to allow Councils to consider protection of highly productive land as a lower priority and not consider cumulative effects. Richmond is currently expanding at one of the highest rates in NZ and one of the easiest places to expand into is the Waimea plains which are covered by Class A soils. Those plains are being developed for single-storey, low-density, housing and commercial use. That is sacrilege. If all buildings were required to be multi-storey, it would consume these plains at a much lower rate. Germany, Holland, Denmark and Scandanavia know how to do this. We need to take a leaf out of their book. We do not want to be forced to buy in vegetables from overseas where they may be of dubious quality. If air travel gets reduced in the future, buying fresh veges from overseas may not be an option.

#### Clause

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

#### Notes

Highly productive land must be considered highly important to protect and only allow urban encroachment in these areas if there are sufficient similar soils and water for irrigating those crops for future generations in areas within 20km or so from the site. Councils must plan higher density of urban development to reduce urban expansion into these areas.

#### Clause

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

## Notes

I have experienced urban expansion covering very large areas of versatile, elite, highly productive soils in Canterbury and Nelson. There is no doubt in my mind that we will "wake up" to this issue big time in a few generations and say, we have made a major blunder and there is no going back.

## Clause

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

## Notes

Regional

## 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

Both should strongly require more efficient use of land with denser residential areas with multi-storey buildings. This will make public transport more efficient.

## 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

There needs to be some off-setting if subdivision is to go ahead on HPL. Economics has to favour protection of productive soils if they are in fact so rare in a region.

## 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. Opening this up to a democratic process is fraught and we will lose such land for decades while we wait for the policies to be ratified.

## 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

I don't know of any large scale rural industries that are causing this problem.

## 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

They need to have completed this process within 5 years

You have elected to withhold your personal details from publication.