

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

Juliet Johnson, **New Plymouth District Council (Juliet Johnson)**  
Private Bag 2025  
New Plymouth 4340  
Taranaki  
New Zealand

## Reference no: 40

### Clause

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

### Notes

We generally support the introduction of an NPS for the protection of Highly Productive Land as it will allow Councils to undertake best practise planning. However, we also support the possibility that the NPS-HPL could be merged with the NPS-UD, as there are strong overlaps between the two NPS's. At the least greater consideration of the relationship of these NPS's needs to be given. At a general level we support the exclusion of all urban land and future urban zones identified in district plans from the NPS. We also support the exclusion of industrial, commercial, special purpose (including Māori Purpose) and open space zones. We note that the costs and benefits analysis of the NPS is not particularly positive and that the discussion document notes its limitations. The discount rate is also quite high. We would like to see further work done on the analysis, together with a consideration of climate change effects. We consider that for the NPS to be effective mapping is required. However, we acknowledge that the mapping exercise required by the proposed NPS-HPL will be costly and complex. However, we do consider this work to be a 'one-off' exercise and beneficial over the long term. National funding and/or resourcing assistance is required to undertake this work and regional funding models targeted at those areas most impacted. There is some concern that the other factors used for identifying highly productive land (size of land parcels, water availability and access) should not be used to include areas of less productive land (ie: LUC classes 4-8). This would not be appropriate and would undermine the intent of the NPS. Consideration to the impact on the development potential of Maori land needs to be given through this identification process. We would like to see guidance introduced with the NPS on identifying highly productive land to assist with this identification process. This guidance would need to be released and tested before the NPS is gazetted. The timeframes for implementation of Policy 1 (mapping of land) should be aligned with the development of Long Term Plan so that the funding needed could be included in successive funding cycles.

### Clause

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

### Notes

NPDC has introduced the issues of versatile soils back into its Proposed District Plan and has considered this in its planning for growth areas and managing rural subdivision. The NPS would provide further support to this policy approach, which is not currently clearly identified in effects based focus in the RMA. We support proposed policy 4 addressing rural subdivision and fragmentation. This is a key issue the proposed NPDC District Plan has addressed through the introduction of a new Rural Lifestyle Zone to avoid the fragmentation of the Rural Production Zone for adhoc lifestyle development. NPDC strongly support the inclusion of policies to address private plan changes and resource consent applications on HPL as these are areas of planning implementation that are not often considered by Government policy. This would give us a stronger policy direction for declining or accepting these applications and send clearer signals to those undertaking large private plan changes. In respect of the plan change process, we support the insertion of policies into the RPS and both regional and district plans without using the Schedule 1 process, as this will decrease the cost of implementation for councils.

### Clause

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

### Notes

We strongly support the inclusion of a policy to address reverse sensitivity issues and note that similar policies are included in our Proposed District Plan. It is noted that for this policy to be successful that areas of productive land need to be identified. Reverse sensitivity implementation would also be improved by the sharing of data or maps between councils so that the locations of significant primary production operations are more easily included in our in-house systems.

### Clause

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

### Notes

We note that any definitions in the NPS would need to align with those in the National Planning Standards. Changes to definitions not covered by the NPS would need to be targeted only to HPL so that they do not affect existing definitions. The spatial layers would also need to be considered in the mapping standards of the National Planning Standards to ensure national consistency. As indicated above we would like to see a consistent approach taken for the NPS-UD and the NPS-PL so as to not have conflicting values between the Proposed NPS-UD and Proposed NPS-HPL.