

Your submission to Proposed National Policy Statement for Highly Productive Land



Reference no: 42

Clause

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

Notes

Economies of scale for food processing and distribution; reduction in waste and carbon emission for movement of products.

Clause

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

Notes

Providing for food security for New Zealand's current and future population.

Clause

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

Notes

While indirect reference to the protection of our finite soil resources is provided within the current RMA framework direct reference would ensure protection of this resource and provide consistency across the country.

Clause

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

Notes

Not currently. Higher economic value is assigned to urban uses, however we can't make more land therefore recognition of this finite resources is possibly not getting the recognition in current decision making that it should.

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

Notes

Generally they are not - if the minimum lot sizes are met for a Rural Zone then further consideration of the cumulative effect in terms of fragmentation is not generally considered.

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

Notes

Not currently identified by district or regional plans, heavy reliance on minim lot sizes to protect rural land.

Clause

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

Notes

It should be identified and protected, while recognizing not all rural land is appropriate for future urban use, given context specific limitations and proximity to urban use.

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

Notes

Rural-lifestyle development is an inefficient use of land and cumulative leads to the fragmentation of productive land. Typically it does not provide for productive use, yet is serviced to urban standards.

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

Notes

Identification of highly productive land is a crucial first step - as there may be areas/circumstances in which land cannot be considered or used for highly productive purposes in which case residential including rural-residential use may be appropriate.

Clause

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

Notes

Areas could not practically be used for primary production activities should be identified as constrained in the recognition of future urban expansion areas. Creation of production 'islands' should be avoided. A buffer zone between urban use and rural production land would provide a sense of separation and potentially avoid reverse sensitivity conflicts. Long term strategic planning should identify potential areas of production land at risk from reverse sensitivity.

Clause

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

Notes

a buffer zone between intensive urban use and rural production land. Identification of productive land consistently through regional and district planning documents so there is transparency for land owners (both production and urban) in terms of the potential for reverse sensitivity to arise due to urban expansion. Outer growth limits could also provide certainty and transparency and direct growth toward intensification rather than expansion.

Clause

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

Notes

There is an issue between competing land uses and short term gain for select land owners and the overall collective responsibility of the current generations to provide for future generations in terms of food security and capacity.

Clause

Are you aware of other problems facing highly productive land?

Notes

Every rural subdivision fragments production land in terms of cumulative effects. However District Plan minimum allotment sizes for rural land often have ways in which the minimums can be avoided. Consistency in the approach with respect to rural and rural-residential subdivision is one of the key issues.

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

Notes

An NPS would provide high level guidance and specific direction which is currently lacking to both regional and district council's. It would provide greater weight in the context of council decision-making particularly with respect to rural subdivision.

Clause

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

Notes

National Planning Standards could provide guidance and consistency in terms of rural zones, minimum allotment sizes and whether rural-residential use should be provided for at all. Zone definitions and intents consistent across all council's would provide certainty to land owners and developers alike.

Clause

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

Notes

highly productive land - as has been recognized in the discussion document there is more to rural production than just the quality of the soil.

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

Primary production generally, who knows how technology may change the way we produce food, there needs to be some flexibility moving forward.

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Do you support the scope of the proposal to focus on land use planning issues affecting highly productive land? Why/why not?

Notes

Yes - production is a use of land as is living on it. Residential land is considered more valuable therefore production land is not given

due consideration in terms of the overall availability of production land at a regional or even national level. Converting land for residential use one property at a time leads to a cumulative loss of production land, yet we don't know the extent of this loss or the land available as the only empirical evidence we have of soil capacity in an outdated map from the 1970's! Production land is a necessary land use and needs to be considered as such when we are looking at the long term allocation of land and capacity for certain uses. Land is a finite resource and as a nation we need to know the capability of the resource we have and protect it for future generations.

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

Ideally the NPS-UD would identify future urban areas but this would only apply to high growth areas. There is potential for the NPS Soils to require identification of productive soils regardless of whether or not there is currently urban growth pressure. Would the NPS soils have to be considered when identifying future urban areas? if yes then once those areas are identified as suitable for urban use, they should be excluded from the NPS, otherwise this adds another layer of complexity and cost to future development. This is assuming areas suitable for urban use will first be considered under the NPS Soils when initially identified.

Clause

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

Notes

Nationally - to provide consistency and so empirical evidence can be gathered as to the total amount of productive land capacity we have as a nation.

Clause

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

Notes

To know how much productive land we currently have, how much food production capacity we have and how we are going to continue to maintain the productive capacity and food security in the face of population growth and climate change.

Clause

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

Notes

An updated Land Use Capability classification system; developed nationally with national government providing the necessary knowledge and resources to smaller council which might not otherwise have the capacity to provide this information. Constraints to use as highly productive land should also be considered, such as proximity of existing urban use and potential for reverse sensitivity issues which may have already been created.

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

Notes

Water availability as a criteria should not rely on large scale irrigation schemes which may or may not be sustainable long term. By the same token climate change may affect water availability for currently productive land. Water is definitely a critical criteria but it would be good to be able to consider the reliability and sustainability of water supply in the criteria of productive land.

Clause

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

Notes

Prioritizing highly productive land could economically impact existing land owners as it may be viewed as constraining the development and or use options for land which meets the criteria of highly productive land.

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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

There is currently a gap in consistency as to how rural land is treated in decision making - there is the potential for confusion between this and the NPS-UD.

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

Transparency in the process as to how highly productive land is identified and then consistency with the future urban growth areas.

The immediate effectiveness of the NPS soils will potentially reduce the options for urban growth on the fringes of existing urban areas. Reverse sensitivity could also be an issue if areas of productive land are encroached on by urban development. Highly productive land is irreplaceable and a finite resource - this status must be given due consideration when we are considering options for urban expansion.

Clause

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

Notes

First highly productive land needs to be clearly identified, through an empirical process, consistent throughout the country. Future expansion areas should take into account productive land and preferably make use of areas identified as not productive land.

Clause

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

Notes

Guidance on minimum lot sizes to retain productive capacity for rural zones. Collection of better data on the use of land and total area of productive land at a district, regional and national level. An analysis of the amount of productive land NZ requires to support our current and anticipated populations to ensure future food security and avoid reliance on importing food.

Clause

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

Notes

Identification of highly productive land in the first instance and its recognition and status identified in regional and district plans. Potential for reverse sensitivity from existing residential use should be recognized as a potential constraint in the process of identifying highly productive land. The identification of highly productive land should also take into account existing context, there are likely rural areas which would meet the requirements of highly productive land but could not be used for primary productive purposes due to the proximity of existing or identified future urban use.

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

Suitable allowance should be made to ensure even if land is identified as highly productive potential reverse sensitivity effects are given adequate weight to allow development of land which may be surrounded by existing or future urban use.

Clause

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

Notes

Cumulative effects need to be considered based on the total area of productive land available in a region in order to adequately assess the cumulative impact - however can the cumulative effect be adequately assessed when we do not know the total value or area of the resource?

Clause

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

Notes

Guidance on exclusions i.e. land is not considered productive land if it is within an existing urban area or future urban area or at risk of reverse sensitivity issues.

Clause

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

Notes

There should be a process for challenging the determination of whether land is highly productive, working with the potentially affected land owners.

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 - this will provide consistency for every council at the outset and potentially reduce the costs of implementation as it will be the same requirement for every council.

Clause

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

Notes

Not all rural land should be automatically production land, zoning is primarily based on historic land use. Areas with waterways might be better protected through other means as this could potentially undermine the attempts to clean up our waterways.

Clause

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

Notes

Flexibility should be provided for to allow region specific responses, taking into account site specific context and constraints.

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

More guidance but based on facts rather than subjective interpretation of "inappropriate". Consistency on what is considered inappropriate needs to be provided at a national level.

Clause

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

Notes

Transparency and certainty for land owners, occupiers and future land owners. Spatially identifying highly productive land will also allow the cumulative effect of using highly productive land for other uses to be tracked and considered on a district or regional basis rather than a site specific one. It will also allow fragmentation to be identified visually in order to focus on areas currently at risk.

Clause

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

Notes

Regional - areas of future growth will have to be identified in combination with districts and cities but potential areas need to be identified secondary to productive land i.e. if land is not identified as highly productive it could potentially be used for other purposes such as rural-residential or urban uses.

Clause

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

Notes

Council costs - hopefully consultation with potentially impacted land owners.

Clause

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

Notes

Scientific expertise or at least a step by step guide on how to identify highly productive land - including consultation or at least communication with land owners.

Clause

Should there be a default definition of highly productive land based on the LJC until councils identify this? Why/why not?

Notes

Yes - as an interim measure but also needs to include a process to remove land if it is not suitable for primary production purposes.

Clause

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

Notes

Existing context - land immediately adjacent to existing or future urban areas the potential for reverse sensitive issues needs to be considered when applying the LJC as there are areas which may no longer be suitable.

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

Areas which are irrigated alters the productive capacity of land in a way which may not be sustainable. The lack of information

regarding the total capacity of our ground water resources may adversely affect consenting of water takes in the future. Also water takes have a limited life and therefore may not accurately represent the long term or sustainable productive capacity of land.

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

Land is a finite resource and should be afforded protection as such. Categories provide a hierarchy of the most valuable land and its protection should be commensurate with that value.

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

Publicly available mapping and a processes of communication and consultation with potential impacted land owners.

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

They will have to work in combination primarily to identify areas appropriate for urban expansion and afford protection to those areas of highest productive capacity. Practicality must be considered with respect to productive land near existing urban areas and potential expansion.

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 - minimum lot sizes would be a good start in order to provide national consistency.

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

With more and more of our population living in urban areas there are less farmers and a smaller pool of people willing to undertake that work. There may come a point when incentives are required to ensure protected productive land is used for its intended purpose, however this has to be carefully considered.

Clause

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

Notes

Ensuring urban growth adequately considers buffer area when identifying areas for future expansion. There is no point in identifying productive land if it is the unable to be used for productive purposes.

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

The best time to plant a tree was 20 years ago, the second best time is now! If we do not start a process to protect highly productive land from inappropriate use and development the cumulative impact of this loss may not be felt until future generations or may manifest in food security issues in the future. The change will be difficult to manage and not everyone is going to like it or benefit from it but we have to start somewhere to ensure sustainability for future generations.

Clause

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

Notes

Point of clarification, is the LUC classifications based on data from the 1970's or is it based on recent data?

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

A nationally mandated process so all councils have the consistent approach to identifying such land and so each council is not reinventing the wheel. the identification process needs to be something council's can implement easily without a financial burden.

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

Time frames proposed seem reasonable.

You have elected to withhold your personal details from publication.