

Your submission to Proposed National Policy Statement for Highly Productive Land



Reference no: 43

Clause

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

Notes

Existing owners/experience, labour & infrastructure.

Clause

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

Notes

Local produce, lower consumer costs, reduced transportation time/costs & emissions, food security, less fertilisers required.

Clause

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

Notes

Absolutely not. The RMA removed the protections given to highly productive land under the Town & Country Planning Act 1973, whereby it was a "matter of national importance" to: "avoid encroachment of urban development on, and the protection of, land having a high actual or potential value for the production of food" and "the prevention of sporadic urban subdivision & development in rural areas".

Clause

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

Notes

Not directly, it is essentially upto the local authorities to create a District Plan that may or may not have provisions to deal with highly productive land. Often this is dealt with by minimum lot sizes in rural areas which do not have the effect of managing or protecting highly productive land.

Clause

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

Notes

Generally, the benefits of highly productive land are not considered. As long as a developer can pay consultants to get a rural lifestyle subdivision though, the benefits of highly productive land will be ignored by most local authorities.

Clause

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

Notes

Generally the benefits of highly productive land is NOT considered at all when providing for urban greenfield developments. Examples: 1) Christchurch examples include Prestons, Halswell basin & rezoning of land around Redwood/Northwood. Areas of northwest Christchurch are excellent for market gardening with deep, rich, low lying soils. These produce multiple crops per year and are close to the city, thereby reducing transportation costs & emissions. Development costs are higher due to more earthworks, ground remediation, Geotech, etc. 2) Waimakariri currently allows subdivision into 4 hectare blocks all across the rural area. This has led to fragmentation of farms & productive soils which are no longer productive e.g. running a pony instead of growing food to feed 2700 people. There is reverse sensitivity issues whereby new townies complain about existing farming activities. The countryside is dotted with small, unproductive land holdings having a dwelling on each.

Clause

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

Notes

Highly productive land should be totally off limits to urban development, like the green belts in the UK. The UK has about 13 times NZ population and they have realised the importance of conserving productive land for growing food, not housing.

Clause

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

Notes

Generally the benefits of highly productive land is NOT considered at all when providing for rural lifestyle developments. An example from above is repeated below: 1) Waimakariri currently allows subdivision into 4 hectare blocks all across the rural area. This has led to fragmentation of farms & productive soils which are no longer productive e.g. running a pony instead of growing food to feed 2700 people. There is reverse sensitivity issues whereby new townies complain about existing farming activities. The countryside is dotted with small, unproductive land holdings having a dwelling on each. 2) Selwyn also allows subdivision down to 4 hectares in a large part of their district. The effects of this are similar to that mentioned above in the Waimakariri area.

Clause

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

Notes

As above, highly productive land should be totally off limits to rural-lifestyle development. This type of development has an even worse effect on highly productive land due to the low density of the dwellings.

Clause

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

Notes

Primary production activities must take precedence, unless the scale/intensity/operation is being increased significantly.

Clause

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

Notes

No complaints covenants placed on all new titles within say, 500m, of rural properties.

Clause

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

Notes

NPS. This has the greatest direction to address the issues at hand.

Clause

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

Notes

Try to cover both the high class soils (e.g. LUC 1-3) & highly productive land (e.g. grapes, stonefruits, apples) if possible.

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 in general to avoid complications & too much detail.

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. As long as subdivision consent has not been issued, they should be included under the scope of the NPS.

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

Total protection of highly productive land from urban development.

Clause

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

Notes

Positives: Food security, reduced carbon emissions, reduced farming intensification, reduced fertiliser, greater biodiversity, better water quality, cheaper food prices
Negatives: Developers & land bankers don't get richer at the expense of 99.9% of the population!

Clause

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

Notes

It should not be considered at all for urban development. Any urban expansion should be prioritised in existing urban areas through increased density or building upwards.

Clause

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

Notes

Rural subdivision should be prohibited unless highly productive land is to be developed more intensively for primary production, & this is enforced e.g. orchards.

Clause

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

Notes

Reverse sensitivity cannot be complained about unless the activities on highly productive land are significantly increased in scope or operation.

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

The NPS should prohibit private plan changes seeking to rezone highly productive land for urban or lifestyle uses. The only possible exemption could be for high urban density living on lower quality soils e.g. 50+ dwellings per ha on LUC 3 soils.

Clause

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

Notes

The NPS should prohibit resource consent applications for subdivision on highly productive land. The only possible exemption could be for high urban density living on lower quality soils e.g. 50+ dwellings per ha on LUC 3 soils.

Clause

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

Notes

None.

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. Where legislation is vague, it can be argued against to arrive a determined outcome.

Clause

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

Notes

Pros: Easily searchable, no ambiguity. Cons: Some areas may be missed.

Clause

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

Notes

Regional; soil is a natural resource with the best expertise in regional councils. At a district level, there is likely a greater conflict of interest.

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

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

Ideally not, all three classes should be protected equally. This removes arguments about LUC classes, and more complex rules.

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. The NPS should prohibit resource consent applications for subdivision on highly productive land. The only possible exemption could be for high urban density living on lower quality soils e.g. 50+ dwellings per ha on LUC 3 soils.

Clause

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

Notes

Reverse sensitivity cannot be complained about unless the activities on highly productive land are significantly increased in scope or operation.

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

High population growth areas: 1 year All other regions: 3 years

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