

Your submission to Proposed National Policy Statement for Highly Productive Land



Reference no: 45

Clause

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

Notes

Existing food hubs are a more sustainable approach to supplying vegetables and fruit to the domestic market and through agglomeration result in more efficient exports, knowledge sharing and ultimately greater productivity. The benefits can be maximised by limiting lifestyle block development that threatens economic viability of food hubs. They can also be supported by having well functioning infrastructure and connections between food hubs so that operators can continuously supply vegetables through the year.

Clause

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

Notes

Highly productive land can be used to grow produce with fewer inputs. By virtue of its location (e.g. usually be rivers) it also tends to be close to or part of urban areas and historically valued as a good place to settle.

Clause

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

Notes

It provides opportunities for Councils to determine this as it relates to their jurisdiction. However, the focus is more on soils as oppose to productive land. The RMA currently doesn't have much clarity around productive land.

Clause

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

Notes

The RMA provides opportunities for Councils to do this but it is broad so there is room for a lot of differing interpretations. In general I think that some Councils have recognised high quality soils but the methods used to protect them haven't been overly successful. There needs to be wider understanding of the economic processes and reasons of why high class soils come under pressure for urban development and particularly how lifestyle blocks lead to increases in land value. This artificially increases the value of productive land by lifestyle blocks (because there is an expectation that the land will be able to be further subdivided). Rates increase as do reverse sensitivity concerns, These factors decrease the economic viability of continuing to operate a market garden close to large urban areas. Economic processes need to be understood along with an understanding of future trends and incorporated into planning processes under the RMA. This is the only way that highly productive land can be managed against competing land uses in an RMA framework.

Clause

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

Notes

I have been a planner for over 15 years. I don't think the values and benefits of highly productive land are considered in the consenting process is any more than a superficial way. The issue is that high class soils are considered on a case by case bases, consent by consent. Individually, even if a subdivision is a non complying activity, the argument generally is that the effect of one subdivision is no more than minor (so it passes the test). There is also an argument on a consent basis that lifestyle blocks can be more productive as a result of hobby farming (that is specialised and has high returns at least at the start). On a regional level, it has an impact and effect that is definitely more than minor. The impact is also from increases in land values that subsequently increase the costs of operating market gardens and the ultimate viability of productive land. These kind of economic considerations are not widely understood or taken into account in individual consents.

Clause

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

Notes

As part of my masters thesis I demonstrated how Auckland had expanded on to productive land since the 1960s. This was despite having metropolitan urban limits and a variety of different urban growth policies. The City always expanded and jumped over the line, on to productive land. There are numerous examples of this in South Auckland. Currently, land that has high productivity seems to be

given second priority to providing further land for houses (even though there are other ways to provide those houses that doesn't have the same long term impact). The issue I see is that decisions about urban expansion and productive land have been and still are at least in Auckland, made in a piecemeal way. The thinking seems to be at first "theres still lots of productive land in Auckland" and then "theres still lots of productive land thats accessible to Auckland in the North Island".

Clause

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

Notes

I think its location dependent. For locations like Auckland the have enough capacity that could be realised within existing urban areas and future urban areas, productive land should be given a high weighting. But also there needs to be consideration as to whether productive land can operate viably and if it isn't economically viable what other policy interventions may be required? For smaller towns that are growing (for example Te Kauwhata) some allowance does need to be made for limited expansion that is logical. To date the approach to urban growth management has focussed on artificial lines and urban based policies. However the focus needs to be more on managing rural land and stopping lifestyle block development (that leads to pressure for further urban expansion). More thought also needs to be given to the future. For example, methods of producing food into the future will change, with vertical gardens, indoor gardens, and market gardens that can be viable inside or under urban buildings. How will this change the way we think of productive land?

Clause

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

Notes

Generally, it is more in relation to high class soils. For example in Waikato District you can only locate on rural lifestyle lot on the equivalent of high class soils. Most of the policy direction is in relation to land uses on high class soils.

Clause

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

Notes

The economic impacts of rural lifestyle block development (as well as wider environmental impacts) of lifestyle block development needs to be considered. Allowing lifestyle blocks to be developed not only directly removes productive land but it also threatens the economic viability of the remaining productive land that borders lifestyle blocks. This is something that is not considered generally and should be because it is really important (at least for the next 10 years whilst we are still more reliant on land resources).

Clause

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

Notes

People that choose to have a rural lifestyle need to understand what activities occur in a rural area and what that means in terms of effects and amenity values. Its peoples expectations that need to be managed rather than the activities themselves that are generally very well regulated and operate under strict consent conditions (or rules in plans the require them to control effects).

Clause

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

Notes

The best approach would be a green belt that is public space (similar to what used to exist in Cambridge). In a lot of Cities this would require the Government to purchase a strip of land around the urban boundary. This would also reduce economic pressures that I have discussed above and have a better outcome for controlling urban expansion as well.

Clause

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

Notes

There is a problem in my opinion with rural land management and the almost uncontrolled proliferation of lifestyle blocks.

Clause

Are you aware of other problems facing highly productive land?

Notes

Economic pressures for many growers are high though the process of urban attrition (discussed above), with low margins and being forced into being 'price takers'. Environmental compliance costs are increasing.

Clause

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

Notes

Overall I think that the NPS is the better option.

Clause

Are there other pros and cons of a National Policy Statement that should be considered?

Notes

I think some further thought needs to be given to better identifying and working out what 'highly productive land is' and whether all highly productive land is treated equally. Also, how do you respond to changes in productivity and values over time?

Clause

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

Notes

Productive land because land that doesn't have versatile soils can also be productive (e.g. hydroponics).

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

It should be general because we can't predict what crops will be valuable in the future or if there will be new kinds of production that become valuable (e.g. alternatives to animal protein, cricket farming, etc).

Clause

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

Notes

The focus should be on rural land planning at a regional level. And more importantly on rural lifestyle living and making this more restrictive.

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

I think they should because decisions for infrastructure have already been made for these areas and it would result in inefficient future development if the potential of these areas was not able to be realised, now it has already been zoned future urban.

Clause

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

Notes

It should apply to areas where there is lots of highly productive land and pressure for lifestyle blocks.

Clause

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

Notes

That highly productive land is able to be maintained for future generations and used in versatile ways. It also needs to be able to adapt to future technologies and changes in the way food is grown. If its not needed for food at that time then it can be used for other purposes that contribute at that time. For example, tree planting etc.

Clause

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

Notes

It is difficult to determine who should identify it. Ultimately you could determine it via economic analysis. The difficulty with this is that the productivity of crops can change over time so doing analysis on what land is highly productive now might change into the future. You could take into account water availability, discharges, distance to markets, main transport routes etc as well as soils and come up with some kind of ranking system. In some ways the LUC system isn't a good thing to use because it was more intended to be used for farm management as I understand rather than making land use decisions on a wider, strategic level. Individual farmers and growers should not have to pay the costs of any classification and this should be covered by the Government and undertaken by the Government so it is nationally consistent.

Clause

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

Notes

The pros are well understood. The con that I see is that if the land value of a piece of primary productive land is already high and its not overly viable, you end up leaving that person with an unviable operation (unless they can innovate) and few options to change the land use. It constrains the market to allocate land to the highest value use in this way.

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

There is tension between the urban development NPS and this NPS particularly for Auckland and Hamilton.

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

The conversation should be more about rural land management and managing all the things that support urban growth, as well as meeting the needs of a growing population for food. There are a number of activities that require a rural location and are vital to support urban development (like land fills, clean fills, quarries). The focus needs to be on managing rural environments in a way that provides for all these activities that provide for urban expansion as well as rural productive activities. In some ways a rural management NPS or Rural Development NPS would be better. Or even a regional development NPS that incorporates both the urban development NPS as well as a rural NPS.

Clause

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

Notes

Please see above

Clause

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

Notes

Subdivision for lifestyle block purposes shouldn't be allowed unless it enhances rural productivity.

Clause

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

Notes

I am not sure the NPS needs to do this, reverse sensitivity case law is already well developed.

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

It should require regard to be have to highly productive land.

Clause

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

Notes

It should require regard to be had to the impact of the decision on the overall viability and sustainability of productive land.

You have elected to withhold your personal details from publication.

Supporting documents from your Submission

Productive_land_NPS.pdf

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