

Your submission to Proposed National Policy Statement for Highly Productive Land

Laura Hull
Canterbury
New Zealand

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Clause

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

Notes

Existing food growing hubs have been located where they are because that location meets the numerous criteria required for a successful food growing enterprise. Proximity to market, access to transport links, good soil and water, and proximity to sensitive activities are all key. These aspects must be maintained and protected for the values and benefits of locally grown food to continue to be realised. There is risk the values and benefits of good access to reasonably priced, low carbon, healthy food for New Zealanders will be eroded if existing food growing hubs are reduced or forced to move to locations that do not meet all the above listed criteria.

Clause

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

Notes

Growing food is essential, particularly healthy, low carbon food. The demand for food will only continue to increase as the population does and highly productive land plays a critical part in Aotearoa's ongoing ability to meet that need.

Clause

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

Notes

No. The RMA hasn't resulted in regional or district plans clearly identifying highly productive land or requiring robust assessments of the most appropriate use of land. The RMA framework has allowed numerous consents allowing irreversible land use change of highly productive land e.g. housing without due consideration of the appropriateness or effects of doing so.

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

Notes

No. Such clarity is absent, as evidenced by the land use change of highly productive land that has been enabled through resource consents and rezoning.

Clause

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

Notes

In my experience they aren't.

Clause

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

Notes

In my experience it isn't.

Clause

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

Notes

Highly productive land should be identified and have specific criteria attached to it with a high threshold for considering future urban expansion into it. Robust assessments must be made of the requirement and potential opportunities for urban expansion - there should be prohibitive requirements that all other options for expansion including other land areas, infill and vertical expansion (apartments) are not feasible (not just economically) and the urban expansion has a high certainty of being required before highly productive land can be considered for future urban expansion.

Clause

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

Notes

It doesn't appear to be. The 'Inner Plains' area of the Selwyn District is largely made up of excellent growing soils. This area is also on

the periphery of Christchurch and is home to the larger towns of the district, Prebbleton and Lincoln. The vast majority of the Inner Plains area has been subdivided into 4ha lifestyle blocks, which is the minimum allotment size allowed by the district plan. The result has been that excellent horticultural and arable land is now tied up in blocks that are generally too small for a viable food growing operation and are inefficiently used as lifestyle blocks.

Clause

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

Notes

As for urban expansion, however it may be appropriate to allow a small percentage of land to be utilised as appropriately sized rural-lifestyle properties. There should be an assessment done of what the appropriate size for such properties is in various areas, bearing in mind that many lifestyle blocks in reality become too much work for the owners and result in the 'life sentence' concept.

Clause

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

Notes

Where existing, primary production activities should be protected from potentially incompatible activities setting up near them. They should be recognised as the preferred activity on highly productive soils and afforded sufficient protection to ensure they are not encroached on by potentially incompatible activities.

Clause

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

Notes

With appropriate buffer zones and planning frameworks that clearly signal what activities and level of effects can be expected in the interface area. Rural activities can be reasonably expected to operate at best practice - set clear expectations of what this looks like in terms effects on the urban interface and clearly set out that it forms part of the character of the rural urban interface.

Clause

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

Notes

Yes.

Clause

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

Notes

NPS. This is the best option to require action, provide national direction and allow specific regional aspects to be addressed.

Clause

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

Notes

The potential timeframe it could take to be operative in council plans is a concern. Also there is some risk of an instrument created for a specific problem (e.g. Auckland urban expansion into Pukekohe) could result in unintended consequences elsewhere where the same problem does not exist. This potentially happened with the NPS - UDC which enabled housing to be pushed through special housing area processes in areas where the urgent need was not there, resulting in arguably sub-standard urban design and development.

Clause

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

Notes

No

Clause

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

Notes

I believe it should be set at the broader level, to require appropriate consideration of the impact of changing land use. Particularly where the land use change is irreversible as with urban development, it must be clearly identified and understood to ensure robust and balanced long term decisions are made.

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. This is our opportunity to put in place a robust planning framework and narrowing it to certain types of

food production may inadvertently limit us from implementing the best option or dealing with an unforeseen issue in the future. There is a gap in New Zealand not currently having a food security policy and this NPS may end up stopping that gap to some extent until there is something in place.

Clause

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

Notes

Yes.

Clause

What matters, if any, should be added to or excluded from the scope of the National Policy Statement? Why?

Notes

Smaller lots of 2-4ha shouldn't be automatically excluded from the scope. I agree with the issue identified, however believe it would be more appropriate to include them with allowance for future exclusion subject to criteria. There may be potential for such small blocks to be highly productive, or an there may be opportunity to obtain multiple small blocks to run a productive operation. Cumulatively these small blocks can make up a significant area and Selwyn's Inner Plains area is an example where this productive land is currently inefficiently used.

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

Yes it seems fair to exclude future urban areas.

Clause

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

Notes

It should apply nationally, but be crafted carefully to ensure it doesn't result in perverse outcomes in areas where the pressure doesn't exist. While it is being triggered to solve a problem, it must be sufficient to ensure the same problem isn't repeated in other areas in the future.

Clause

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

Notes

The food growing capacity of New Zealand and it's regions is maintained and ideally enhanced (higher demand for locally grown food over imported). New Zealanders have security of access to reasonably priced, healthy locally grown food. To achieve this will also see highly productive land maintained and respected and see employment in the food growing sector and its part in the economy strong.

Clause

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

Notes

Support the approach set out in proposed policy 1

Clause

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

Notes

Yes. These factors are all critical to a sustainable food growing operation and to exclude any of them would risk missing out highly productive land.

Clause

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

Notes

Food is essential to everybody. Not prioritising highly productive land for primary production will enable the pressure for irreversible land use change to continue and in turn push food growing operations into less effective areas or simply stop, reducing food availability.

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 will need to be careful consideration to ensure there are no conflicts between this and the NPS-UDC. There may be potential tension with Essential Freshwater so the relationship will need to be clearly conveyed.

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

By requiring robust assessments of urban demand and the potential land areas available for expansion. Clear criteria by which to assess land for urban develop should be provided and consistent across both NPS. Infill development and vertical growth should be prioritised where appropriate.

Clause

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

Notes

It should be considered in light of the proposed objectives 1-3. Land that is not highly productive should be prioritised and pursued in the first instance. Highly productive land should only be able to be considered if there is no alternative - which must be a balanced evaluation of physical, social, cultural and economic concerns, not just economic.

Clause

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

Notes

Proposed policy 4 seems appropriate. Setting a minimum lot size may result in the majority of that zone being subdivided to that minimum which could still result in fragmentation as in Selwyn's Inner Plains. It may be more appropriate to allow proportions of the overall zone to have varying minimum lot sizes (similar to various living zones having differing minimum lot sizes) or to ensure the zone allowing lifestyle block sizes is an appropriate size itself.

Clause

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

Notes

Support proposed policy 5. Clause (a) is particularly important and a good addition to see - it is critical to set clear expectations as to what the typical activities and effects for the zone are.

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

Private plan changes should have a high threshold to pass, as in practice they can result in fragmented development. Ideally councils should have robust strategic plans identifying future zoning changes to cater for planned and managed urban development. Unfortunately this isn't usually the case and private plan changes and resource consents result in fragmented development that often undermines the Council's strategic plan. The NPS should be conservatively restrictive in relation to private plan changes in order to enable the council to best implement a strategic plan.

Clause

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

Notes

As above for private plan changes.

Clause

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

Notes

This is essential. While a big piece of work upfront, with clear criteria on what highly productive land is, it will avoid debate and argument on a case by case basis down the track.

Clause

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

Notes

Regional.

Clause

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

Notes

Yes. There must be an immediate classification to hold the line and avoid a rush to develop in the time it will take council's to identify this.

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

It should certainly enable amalgamation of small titles. Currently a significant area of highly productive land is inefficiently tied up in lifestyle blocks and this option is sensible. With urban development being an irreversible land use change, areas where highly productive land can be put back into production should be enabled and encouraged.