

Your submission to Proposed National Policy Statement for Highly Productive Land

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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

The existing growing hubs values and benefits are: Better soils, Proximity to large numbers of consumers, Proximity to good transport routes; proximity to established support businesses; proximity to a wider community that understands the business of primary production; proximity to a community which usually includes the growers family and wider connections in the area.

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

Notes

Highly productive land is land for primary production that provides significant economic and employment benefits to New Zealand. The higher the quality of the soil and smaller area needed for production, if we lose our high quality soils we will need larger areas to feed the same population base. Access to irrigation is also an important factor in the productivity of soils. Having access to fresh food is also important for healthy communities.

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

Notes

The importance of highly productive land could be strengthened through the inclusion from sections 6 or 7 of the RMA.

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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

We agree with the discussion document that the importance of highly productive land could be more clearly stated in the RMA framework.

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

Notes

Consideration of the value of land should be made at a national level, as districts which have an abundance of productive land value it less than those where it is a scarce resource. The economic value of Highly productive land is difficult to put a figure on as it is inter-generational and driven by commodity price, therefore land is often valued more highly for development due to the ease of greenfield development. This means that the values and wider benefits are not fully taken into consideration as part of the planning process.

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

Notes

There appears to be little consideration of HPL in urban expansion decisions in our area.

Clause

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

Notes

Yes, it is a finite resource, and one which is key to our wellbeing and economic sustainability.

Clause

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

Notes

There appears to be little consideration. 99% of the soils in our area are class 2 and 3 so there is limited ability to focus expansion on a lesser soil class.

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

Notes

Rural subdivision into rural-lifestyle developments provides a lifestyle choice, but in doing so fragments rural land making the redevelopment into denser urban zones in the future difficult and creating reverse sensitivity issues which can limit the use of HPL to their full potential.

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

Notes

The ability to maintain primary production on our HPL must be maintained due the finite nature of the resource and the implications its loss would have on the provision of fresh food and income to our communities. If other activities wish to establish in these areas they need to do so with the understanding that primary production occurs in the area and that it can create certain nuisance effects, but those effects are part of the new activities chosen environment.

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

Notes

Education is key so that there are no surprises. Planning protections should be put in place to ensure that potentially incompatible activities cannot limit the primary production activity where it is located on HPL. This is to the the finite nature of the HPL resource.

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

Notes

Yes, there is a problem and as populations grow and the effects of climate change occur it could become more pronounced.

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Are you aware of other problems facing highly productive land?

Notes

Ability to attract staff, transport routes, complicated compliance and regulation can all have an impacts. HPL can be subject to unforeseen consequences of other policies such the housing policy and the freshwater policy.

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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 be most effective, we are supportive of this approach.

Clause

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

Notes

A pro is the national direction given, while allowing regional councils to reflect the regional circumstances in their policy and rule development.

Clause

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

Notes

HPL - these soils and the fresh food that can be grown on them are key to our social and cultural wellbeing. The soils are also key to our economic wellbeing for primary production and tourism.

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

The NPS should be on primary production generally. If the soils are high quality they should be protected, with climate change and population growth it is likely that areas that are currently used for primary production may be used for local food production into the future. Once lost to urban development these soil will be unavailable for future uses.

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, it is important to protect this finite resource.

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

Not necessarily, those areas are likely to be near large markets for local produce, while ear marked for development the development has not yet happened. These should be assessed on a case by case basis.

Clause

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

Notes

Nationally, with climate change and population growth our 'target areas' may change into the future, but once they are developed it would be very unlikely that they could come back into production.

Clause

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

Notes

Fresh Food at an achievable price both locally and internationally.

Clause

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

Notes

We support the proposal of the identification by the Regional Council based on the framework in an NPS.

Clause

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

Notes

Yes.

Clause

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

Notes

Pros: fresh food to support social and cultural wellbeing; long term economic benefits from primary production and tourism. Secondary effect around urban areas with HPL of promoting urban development at a greater density within the existing urban boundary, easing congestion and supporting public transport.

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

Greenfields development is not the solution for our cities, it is a quick fix where developers benefit, but long term the wider community is disadvantaged. It results in the loss of our HPL and urban sprawl.

Clause

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

Notes

We support the proposal in the NPS option drafted into the discussion document.

Clause

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

Notes

We support the proposal as drafted

Clause

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

Notes

We support the proposal as drafted

Clause

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

Notes

Spatial definition is a good idea. The only con is the scale at which mapping occurs. There should be provision for ground truthing as a line on a plan can cover a whole property.

Clause

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

Notes

Regional in close consultation with the District Councils.

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

Notes

ECans are better placed to answer this. Canterbury Maps does have a lot of data which would be a good start.

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

Notes

Yes, as it will avoid a 'gold rush' on development.

Clause

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

Notes

We support the current proposal

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

We support the policy as drafted

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

No this should be addressed at a local level.

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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

No, this should generally be left to the market. Specific Regional or District Councils should give certain mechanisms consideration depending on the circumstances they are looking to address.

Clause

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

Notes

The level of sensitivity will relate to the activities that occur and the world view of the wider community that live in the area. This should be defined at a regional or district level.

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

We support the policy as drafted

Clause

Should there be minimum threshold for highly productive land (i.e. as a percentage of site or minimum hectares)? Why/why not?

Notes

Yes this would be a good idea, there will need to be sufficient flexibility for District Councils to consider property boundaries when making their planning decision of HPL.

Clause

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

Notes

No

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

We support the proposed timeframes