

Your submission to Proposed National Policy Statement for Highly Productive Land

Wellington
New Zealand

Reference no: 63

Clause

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

Notes

Probably through the NPS and plans.

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

Notes

Yes. The document explains the problem well.

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

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NPS. For the reasons explained in the document.

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

Notes

Probably on highly productive land as there are considerations other than soil. However, issues such as access to an existing market/workforce should not be weighted more than versatile soils as they can be addressed relatively easily but the soil, once gone is gone for good.

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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 focus should be on arable cropping. Pastoral farming can be carried out on less productive land. With the current increase in people eating plant based diets and moving away from livestock consumption, and the well documented need for this to continue if climate change is to be addressed in any meaningful way, we need as much land as possible for arable cropping.

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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. There is other planning legislation to deal with water pollution and so-on, especially the revised NPS on water.

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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 be included as there is only a small amount of highly productive land. In light of the NPS - UD it is possible that future urban areas and zones will (should) be reconsidered given the need for intensification of existing urban areas rather than greenfield development.

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

Notes

Nationally. Just because land is not under pressure now doesn't mean it won't be in the future.

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

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Ideally, no net loss and a continuing ability to produce food.

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

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Regional Councils with guidance and advice from government and input from district councils and industry groups.

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

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They look to cover what is best. The split between essential and advisory factors is good.

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

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I don't see many cons. It's essential to protect this dwindling resource.

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

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As more important than urban expansion unless there really is no other option.

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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. It will allow the protection of highly productive land to begin earlier.

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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. It seems that one of the issues now is that there is not enough commonly understood, national guidance, so individual councils can have very different views.

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

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Pros: It's easier to use information on GIS/mapping etc Cons: it will be expensive and probably time consuming to update the existing dated information,

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

Notes

Probably regional, as less likely to get cross border issues and it will be more difficult to change designations through plan changes.

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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. There isn't anything else to use at the moment and it will take time for councils to identify land.

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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

This may be problematic given the future effects of climate change.

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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

No. treat them all the same.

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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. National direction will make it easier for developers and councils.

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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

This seems like a good idea given the current reduction in availability of productive land.

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

Notes

The approaches set out on pages 46 and 47 seem good.

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

Notes

They look good.

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Are there other key terms in the National Policy Statement that should be defined? If so, how?

Notes

probably not.

You have elected to withhold your personal details from publication.