

# Your submission to Proposed National Policy Statement for Highly Productive Land

Auckland  
New Zealand

**Reference no: 67**

**Clause**

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

**Notes**

My comments are focused on responding to the challenges around our changing climate. Firstly, limiting our impact, and secondly, being ready to adapt to whatever happens in the future. Historically, town centres have grown up in areas of highly productive land, to service the surrounding farm ventures. As these centres have grown, they have spread to cover more of that very land. We now have a better idea of the limited availability of this valuable land and should be able to make better choices.

**Clause**

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

**Notes**

Highly productive land is most important for its flexibility, and for its growing capacity. Land close to our cities may be needed in future to focus on providing food for the local population. This adds resiliency to our food supply. On the other hand, New Zealand will likely be one of the luckier countries as the climate changes, and we will need to be able to maximise the production of food to supply to the world's population - not just our own.

**Clause**

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

**Notes**

It does not appear to be so. Many of the areas marked out for urban expansion by Auckland Council in its planning processes are areas of highly productive soil. For example areas around Drury, Pukekohe, Kumeu. The pressure to release land for housing had led to urban sprawl onto these lands, when the correct response would have been intensification.

**Clause**

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

**Notes**

It does not appear to be so. Many of the areas marked out for urban expansion by Auckland Council in its planning processes are areas of highly productive soil. For example areas around Drury, Pukekohe, Kumeu. The pressure to release land for housing had led to urban sprawl onto these lands, when the correct response would have been intensification.

**Clause**

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

**Notes**

Highly productive land should be (as far as possible) excluded from future urban expansion.

**Clause**

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

**Notes**

Small blocks can be intensively used for production. So block size is not itself the issue. Perhaps a limit on house size and paved area, or use would be appropriate. I expect that in the not distant future, family scale, intensive production with low machinery/chemical input will become more relevant again.

**Clause**

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

**Notes**

Some of the nuisance is not sustainable (it damages the soils that were highly productive, making them less productive), or is a nuisance to the productive and valuable forms of production (such as the impact of chemical spraying on nearby organic production). So this not just an urban/rural problem, and the solution depends on the nature of the nuisance.

**Clause**

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

**Notes**

Yes. Not just for the loss of land, but urban sprawl is itself a problem for resource use, while proximity to food growing areas will be necessary in many future scenarios (eg: for climate change mitigation).

**Clause**

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

**Notes**

The NPS should focus on all highly productive land. For many different reasons we need to focus on intensification, and stop sprawl.

**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, because we need to maintain flexibility for the future.

**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**

Areas presently listed as "future urban" should not be excluded from the scope. Responding to the challenge of climate change (including adapting to its effects) will require substantial change to the status quo. This means revisiting planning decisions already made, even if these are recent. For example, many of the future urban zones around Auckland are on productive soils.

**Clause**

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

**Notes**

Should apply nationally. We will need to feed the world, not just New Zealand.

**Clause**

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

**Notes**

It should be excluded from urban expansion, unless there is literally no other option, including intensification. For example, the present housing issues in Auckland are NOT a case of there being no other option.

**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 not be possible to make private plan changes to rezone highly productive land to urban or rural lifestyle.

**Clause**

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

**Notes**

Yes.

**Clause**

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

**Notes**

None. Areas presently listed as "future urban" should not be excluded from the scope. Responding to the challenge of climate change (including adapting to its effects) will require substantial change to the status quo. This means revisiting planning decisions already made, even if these are recent. For example, many of the future urban zones around Auckland are on productive soils.

**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**

As much guidance as possible: flexibility will be misused to get around the intention of the NPS. In planning it will cause delays.

**Clause**

Should the policies extend beyond rural lifestyle subdivision and urban development to large scale rural industries operations on

highly productive land? Why/why not?

**Notes**

Yes. In many cases these industries do not need to be sited on the productive land. In other cases they actively spoil the land for other uses.

**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**

The timetable needs to be shorter. Climate change response is urgent. This is one of many small pieces in that puzzle. The present timeframes will allow developments to commence that should be halted. There should at least be an immediate moratorium on rezoning land to urban/residential/lifestyle, where that land cannot clearly be seen to be low productivity.

**You have elected to withhold your personal details from publication.**