

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

**R M Taylor (R Martin)**

Canterbury  
New Zealand

**Reference no: 68**

**Clause**

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

**Notes**

Existing food growing hubs are centres of horticultural excellence which can act as seed beds for the establishment of other hubs across much of our highly productive land, as we move to a low emission, clean protein, economy where dairy, beef and sheep are in decline, and horticulture and forestry are expanding.

**Clause**

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

**Notes**

As the move to a low emissions, clean protein. economy accelerates, with animal agriculture declining while horticulture and forestry expanding, the 14% of highly productive land will become the mainstay of the agricultural economy where all of our high value plant production is concentrated. We cannot afford to lose or degrade this land.

**Clause**

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

**Notes**

No it does not. It should prevent the conversion of these lands to urban or other built surfaces and it should prioritise their productive use for plant production over animal production (on grounds of trophic efficiency and environmental impacts - economic value should be a contingent priority, not a dominant one). Without strong national direction, the standard RMA process favours parochial, short-term, priorities and is woefully deficient in giving due weight to (a) national interest; and (b) cumulative effects.

**Clause**

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

**Notes**

No, it does not. It fails to assert the national importance of highly productive land and the necessity to maintain and enhance it for food and economic security in the low emission, clean protein, economy.

**Clause**

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

**Notes**

Not a council planner, sorry - but it looks like not.

**Clause**

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

**Notes**

Not a council planner, sorry.

**Clause**

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

**Notes**

Highly productive land should be treated as a taonga and not built on. If such a restriction increases the cost of urban development elsewhere, so be it - that is the true cost of development. To vandalise irreplaceable soils in the name of affordability is to repeat the errors of our pastoral farming sector in stealing from nature and calling it efficiency when it is actually destruction subsidised by environmental externalities and (down the line) by food consumers.

**Clause**

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

**Notes**

Not a council planner, sorry.

**Clause**

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

**Notes**

Rural lifestyle development should not be allowed on highly productive land.

**Clause**

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

**Notes**

Potentially incompatible activities should be unambiguously barred from establishing on highly productive land. There should be a buffer separating incompatible development from these areas.

**Clause**

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

**Notes**

It depends on issue. If the activity is an established land use on highly productive land which is maintaining or enhancing the productivity of that land, it should have priority.

**Clause**

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

**Notes**

I am not a council staff member so do not know how much of a problem this is.

**Clause**

Are you aware of other problems facing highly productive land?

**Notes**

Yes. Compaction by pastoral land use, especially dairy.

**Clause**

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

**Notes**

An NES. There is too much flexibility in the NPS, as proposed here. Flexibility inevitably favours death by a thousand cuts - especially when the NPS-Urban Development is pushing councils to spread onto new land.

**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**

Enabling and providing for plant-based production should be the priority for the highly productive soils with no other uses or developments permitted which might compromise future options for plant production.