

9 October 2019

Ministry for Primary Industries  
E-mailed to: soils@mpi.govt.nz

Joseph Jeffries  
District Plan division

Dear Sir/Madam

**Submission from Hutt City Council on the Proposed NPS for Highly Productive Land**

Please find attached Hutt City Council's submission on the Proposed National Policy Statement for Highly Productive Land (the proposed NPS).

Hutt City has limited areas of productive rural land. Some of this land has a Land Use Capability of 3 but is mostly not agriculturally productive due to site fragmentation and the proliferation of lifestyle type uses.

Hutt City Council (HCC) is supportive of the general direction provided by the proposed NPS. However, HCC would be concerned if the proposed NPS places constraints on land in Lower Hutt that is not agriculturally productive and has been identified for urban development.

In particular, the Upper Fitzherbert area of Wainuiomata, has been identified by Hutt City Council as a key area for future urban development. This area may meet the soil quality criteria for highly productive land but is highly fragmented and dominated by existing rural lifestyle uses.

Our specific comments are generally aimed at ensuring that identification of sites of highly productive land does not include areas with low agricultural productivity that may be suitable for urban development. While the discussion document refers to the exclusion of fragmented sites and areas with rural lifestyle zoning we consider that this needs to be made more explicit through the identification criteria.

If you have any questions about the points raised in this submission or any consequences of the proposed NPS for Hutt City Council, please feel free to contact me on either [REDACTED] or [REDACTED]

Yours sincerely

Joseph Jeffries  
SENIOR ENVIRONMENTAL POLICY ANALYST

## HUTT CITY COUNCIL'S SUBMISSION ON THE PROPOSED NPS FOR HIGHLY PRODUCTIVE LAND

Section	Comment	Request
General	HCC supports the general direction of the proposed NPS in that it provides recognition and direction on how highly productive land should be managed.	Retain the proposed NPS with the amendments set out below.
Definitions	HCC supports a definition of 'Rural area' that excludes areas with a 'rural lifestyle zone' such as Hutt City's Rural Residential Activity Area. This definition will help clarify that these rural lifestyle areas are not intended to be identified as highly productive land.	Retain the definition of 'Rural area'.
Proposed Policy 1	HCC supports the identification criteria under proposed Policy 1 around "the size and cohesiveness of the area of land to support primary production". Without this criteria, HCC would be concerned that areas suitable for urban development, that have low agricultural productivity due to existing site fragmentation, may be identified as 'highly productive land'.	Retain "the size and cohesiveness of the area of land to support primary production" as one of the criteria for identifying highly productive land under Appendix A of proposed Policy 1.
Proposed Policy 1	While the identification criteria takes "the size and cohesiveness of the area of land to support primary production" into account, it needs to be made more explicit that highly fragmented sites will not be identified as 'highly productive land'.	Amend Appendix A of proposed Policy 1 to make it explicit that highly fragmented sites will not be identified as highly productive land.
Proposed Policy 1	As proposed, the definition of 'Rural area' excludes areas "identified as a rural lifestyle zone", but the identification criteria under Appendix A of proposed Policy 1 does not makes it explicit that land with a rural lifestyle zone is to be excluded from identification as 'highly productive land'.	Amend Appendix A of proposed Policy 1 as follows: ... Highly productive land excludes: a. urban areas; and b. areas that have been identified as future urban zones in district plans. <u>c. areas with a rural lifestyle zoning.</u>