

10 October 2019

ROA 05 01  
PAT:MLB

NPS-HPL Submission  
Land and Water Policy Team  
Ministry for Primary Industries  
PO Box 2526  
Wellington 6140  
New Zealand.

**By email only:** [soils@mpi.govt.nz](mailto:soils@mpi.govt.nz)

Dear Sir or Madam,

## **PROPOSED NATIONAL POLICY STATEMENT FOR HIGHLY PRODUCTIVE LAND**

Thank you for the opportunity to make a submission on the Proposed National Policy Statement for Highly Productive Land (NPS HPL). We acknowledge that this consultation is being undertaken at the same time as the Proposed National Policy Statement for Urban Development.

Horizons Regional Council (Horizons) is the regional authority for the Manawatū-Whanganui Regional Council. Horizons believes that our region is a great place to live, work and play. Our responsibilities include managing the region's natural resources, flood control, monitoring air and water quality, pest control, facilitating economic growth, leading regional land transport planning, and coordinating our region's response to natural disasters.

As a regional council, it is our understanding that under the current proposal we would be responsible for identifying areas of highly productive land across the region (Proposed Policy 1), and strengthening the protection of highly productive soils in the regional policy statement (Proposed Policy 2). As such, Horizons has a strong interest in the development of the NPS HPL and its implications for our communities and our business priorities.

We note our general support for the points made by Local Government New Zealand (LGNZ) in its feedback, and also support the submission on behalf of the regional Land Monitoring Forum. In particular, we support LGNZ's submission that the problem definition should be reframed to *the ongoing and incremental loss of highly productive land*. We agree with the Land Monitoring Forum that the purpose of the NPS HPL should be to protect land for those high-value primary production uses that are most site sensitive; it needs to provide credible, robust direction to local authorities to ensure that this versatile land is retained.

Our submission highlights the matters of greatest relevance from our perspective.

In general, Horizons is supportive of the Objectives set out in the proposed NPS HPL. We do, however, have some concerns, particularly relating to the requirements and implications of Proposed Policy 1.

Our concerns are underpinned by a lack of clarity around what the assessment will involve. For example, there are a number of issues around mapping. These include questions of scale, the appropriateness of the LUC framework, and the availability of complete and appropriate base information. We have also raised a drafting issue relating to a definition, and have suggested a longer-term outlook around retaining versatility of soils for productive purposes.

We are unclear the scale at which mapping would be needed for the regional policy statement, given that territorial authorities will be relying on it to apply land use controls. As noted in the discussion document, existing Land Use Capability (LUC) mapping is at 1:50,000 or 1:63,000; based on previous mapping work carried out in the region, it is our understanding that a scale as fine as 1:10,000 would be required to identify LUC at property scale for those areas where there is any complexity to the soil composition.

The indicative costs to complete S-mapping of LUC class 1-3 soils set out in the Indicative Cost-Benefit Analysis<sup>1</sup> highlight the unevenness of actual implementation costs between regions. The cost to complete S-mapping for our region is not only considerably higher than any other region; the analysis also does not consider the relative impact of these costs by taking into account the variation in the each region's population. In Horizons' case, the region comprises 22,200 km<sup>2</sup> with fewer than 240,000 residents. We are also of the view that further S-mapping at a 1:50,000 scale will not be particularly useful for the purpose of identifying highly productive land with sufficient certainty for land use regulation, especially where S-map shows two or more soil types within a polygon.

In the Horizons Region there are two larger cities, a number of large towns and numerous smaller settlements across the region. It is our understanding that growth pressures on LUC class 1-3 land would vary considerably. Similarly, we agree with LGNZ and the Land Monitoring Forum that LUC may be an inappropriate framework for consideration of versatility because of variation within classes – a particular LUC class is not necessarily a reliable indicator of the soil's versatility.

We understand that some kind of mapping will be required to provide an adequate foundation for the identification for highly productive land. However, we consider that gathering information on areas of LUC 1-3 soils at such a fine scale across the whole region would be overly onerous when its most likely future use would be to inform further, much more targeted and nuanced evaluation focused on areas under pressure from development. We would support coordination of mapping efforts, and the development of guidance on how mapping should occur, at a national level with close involvement from regional land monitoring staff, to ensure consistency.

As proposed, the variability in the optional factors that can be considered in the assessment (set out in Appendix A) is likely to result in inconsistent approaches, meaning that it is unlikely it will achieve a national picture of the resource. Greater specificity would be helpful, particularly given differing community priorities and the implications for private property rights that will arise. We consider that the linkages between this instrument and the NPSFM are weak; consideration of water quantity and quality issues should as a minimum be a compulsory consideration in any assessment.

We draw your attention to an inconsistency between the primary production definition in National Planning Standards and NPS HPL, which will be difficult to implement in RPS and district plans. Under section 85I(2)(a) RMA, local authorities must amend their planning documents to include mandatory standards; the Definitions Standard requires that terms defined in the standard must be used when the context is the same; there cannot be two

---

<sup>1</sup> Figure 5. 1 Indicative costs to complete S-map for LUC1-3 areas by region

different definitions for primary production. We fully support the intent of the amendment, to remove quarrying and mining as land use activities for which productive land is protected, but believe an alternative way of achieving this outcome will need to be found.

We also note that the proposed NPS HPL potentially misses a long-term opportunity to return land that is currently urbanised to productive uses, as population and climate patterns change. Identifying where those areas are located as a further, secondary body of work would provide a basis for land use planning to reprioritise them as production land.

If you require any further detail or clarification of the matters covered in this submission, please contact Pen Tucker, Senior Policy Analyst [REDACTED] or 0508 800 800 in the first instance.

Yours sincerely



Michael McCartney  
CHIEF EXECUTIVE