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NPS-HPL Submission  
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## **SUBMISSION ON Proposed National Policy Statement for Highly Productive Land (NPS-HPL)**

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Are you submitting on behalf of an organisation? Yes [ X ] No [ ]

If yes, which organisation are you submitting on behalf of?

Our Land and Water

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### Submission Comments

We firstly provide some overview comments on the proposed NPS-HPL then responses to questions from the discussion document which are relevant to the mandate and expertise of the New Zealand Society of Soil Science

#### *Overview Comments:*

1. Our Land and Water (OLW) is a mission led National Science challenge tasked with the mission to enhance primary sector production and productivity, while maintaining and improving our land and water quality for future generations.
2. Our Land and Water has approved on going funding for three further years (from Oct 2019) in the area of Land Use Suitability. Within this programme an indicator will be developed at a range of scales called 'Production Potential' which it is anticipated in the future will provide useful national scale information relevant for helping determine the location of HPL

#### *Section 2.3: Defining highly productive land [page 19]*

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

Highly productive land constitutes soils that are best left available for primary production given they offer the most versatility in land use options and provide the greatest contribution to wellbeing (environment, economic, social and cultural)

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

No specific OLW comment

*Section 3.1: Problem statement [page 23]*

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

No specific OLW comment

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

No specific OLW comment

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

No specific OLW comment

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*Section 3.2: Urban expansion on to highly productive land [page 24]*

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

No specific OLW comment

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

No specific OLW comment

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Section 3.3: Fragmentation of highly productive land [page 25]

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

No specific OLW comment

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

No specific OLW comment

*Section 3.4: Reverse sensitivity [page 26]*

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

No specific OLW comment

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

No specific OLW comment

*Section 3.5: These issues are being seen throughout New Zealand [page 26]*

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

OLW agrees that HPL should be protected from urban expansion

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Are you aware of other problems facing highly productive land?

No specific OLW comment

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*Section 4.5 Preferred option – a National Policy Statement [page 31]*

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

No specific OLW comment

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Are there other pros and cons of a National Policy Statement that should be considered?

No specific OLW comment

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Are there other options not identified in this chapter that could be more effective?

No specific OLW comment

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*Section 5.2 Purpose of the proposed National Policy Statement [page 34]*

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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?

No specific OLW comment

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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?

No specific OLW comment

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*Section 5.3 The scope of the proposal [page 35]*

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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?

No specific OLW comment

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What matters, if any, should be added to or excluded from the scope of the National Policy Statement? Why?

No specific OLW comment

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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?

No specific OLW comment

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

OLW consider that HPL should be identified nationally to ensure consistency in management and outcomes

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*Section 5.4 The proposed National Policy Statement [page 37]*

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

The right enterprise is operating in the right place to achieve the right outcome

*Policy 1: Identification of highly productive land [page 41]*

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

We support the proposed use of Land Use Capability mapping as the default method for the initial identifying HPL within the timeframe required for the NPS to be approved. However, we would like to raise awareness that the OLW NSC has been developing an indicator called 'productive potential' through its Land Use Suitability Programme and recommend that the findings of this about to commence three year programme (and any other relevant new science) are considered for increased refinement in the methodology used to determine the spatial location of HPL

Tranche 1 of OLW LUS programme assessed five land uses for Productive Potential (PP) and developed indicators of feasibility, yield, returns, importance, and an aggregate indicator of productive potential. It divided the country into typologies, used simulation modelling for each land use on each typology, and used a combination of empirical modelling and direct transfer to extend from the typologies to coverage of all land parcels in the country. The approach has proven sound, but the lack of sufficient data points has restricted the accuracy of the model in parts of the country that are not well represented in the current typologies. Tranche 2 work for established land uses will greatly increase the number of typologies covered, with a more detailed set of up of soil conditions and inputs, and typologies extended to all land parcels using more sophisticated empirical modelling and machine learning techniques. Up to 10 – 12 additional land use types and/or sub-types (e.g. refine 'dairy LU' based on intensity of the system) will be added using the methodologies adopted by a previous SLMACC project.

For more information on the LUS concept please refer to <https://ourlandandwater.nz/future-landscapes/land-use-suitability/> or contact Richard McDowell.

More technical information is available in the following technical manuscript.  
<https://www.sciencedirect.com/science/article/pii/S1470160X1830222X?via%3Dihub>

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

No specific OLW comment

*Policy 2: Maintaining highly productive land for primary production [page 42]*

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

No specific OLW comment

*Alignment with the Urban Growth Agenda [page 43]*

Do you think there are potential areas of tension or confusion between this proposed National Policy Statement and other national direction (either proposed or existing)?

No specific OLW comment

How can the proposed National Policy Statement for Highly Productive Land and the proposed National Policy Statement on Urban Development best work alongside each other to achieve housing objectives and better management of the highly productive land resource?

No specific OLW comment

*Policy 3: New urban development on highly productive land [page 45]*

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

No specific OLW comment

*Policy 4: Rural subdivision and fragmentation [page 46]*

How should the National Policy Statement direct the management of rural subdivision and fragmentation on highly productive land?

No specific OLW comment



Policy 5: Reverse sensitivity [page 47]

How should the National Policy Statement direct the management of reverse sensitivity effects on and adjacent to highly productive land?

No specific OLW comment

*Policies 6 and 7: Consideration of private plan changes and resource consent applications on highly productive land [page 49]*

How should the National Policy Statement guide decision-making on private plan changes to rezone highly productive land for urban or rural lifestyle use?

No specific OLW comment

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

No specific OLW comment

*Section 5.6 Implementation [page 52]*

What guidance would be useful to support the implementation of the National Policy Statement?

No specific OLW comment

Specific / technical questions

The questions below are included in the outline of the proposed NPS-HPL (Chapter Five of the discussion document) and may assist technical experts when providing a submission.

**Specific questions**

**Section 5.3: The scope of the proposal [page 35]**

How should the National Policy Statement best influence plan preparation and decision-making on resource consents and private plan changes?

No specific OLW comment

No specific OLW comment

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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?

No specific OLW comment

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

No specific OLW comment

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#### *Specific questions*

##### *Section 5.4: The proposed National Policy Statement [page 37]*

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What level of direction versus flexibility should the objectives provide to maintain the availability of highly productive land for primary production?

No specific OLW comment

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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?

No specific OLW comment

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#### *Specific questions*

##### *Policy 1: Identification of highly productive land [page 41]*

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

OLW consider that national spatial mapping is required in order to accurately determine the location of HPL or else it will become a more subjective outcome for regulatory debate

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

No specific OLW comment

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What are the likely costs and effort involved in identifying highly productive land in your region?

No specific OLW comment

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What guidance and technical assistance do you think will be beneficial to help councils identify highly productive land?

No specific OLW comment

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*Specific questions*

*Appendix A: Criteria to identify highly productive land [page 41]*

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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?

OLW support the proposed use of Land Use Capability mapping as the default method for the initial identifying HPL within the timeframe required for the NPS to be approved. We recommend that a process to develop a new framework for determining HPL is created that would allow for the latest scientific findings from the OLW LUS programme on productive potential (plus other potential research programmes) to be incorporated into a nationally consistent approach

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What are the key considerations to consider when identifying highly productive land? What factors should be mandatory or optional to consider?

No specific OLW comment

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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 Essential Freshwater Programme?

No specific OLW comment

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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?

No specific OLW comment

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*Specific questions*

*Policy 3: New urban development on highly productive land [page 45]*

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How can this policy best encourage proactive and transparent consideration of highly productive land when identifying areas for new urban development and growth?

No specific OLW comment

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How can the proposed National Policy Statement for Highly Productive Land best align and complement the requirements of the proposed National Policy Statement on Urban Development?

No specific OLW comment

*Specific questions*

*Policy 4: Rural subdivision and fragmentation [page 46]*

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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?

No specific OLW comment

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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?

No specific OLW comment

*Specific questions*

*Policy 5: Reverse sensitivity [page 47]*

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

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No specific OLW comment

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*Specific questions*

*Policy 6 and Policy 7: Consideration of private plan changes and resource consent applications on highly productive land [page 49]*

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Should these policies be directly inserted into plans without going through the Schedule 1 process (i.e. as a transitional policy until each council gives effect to the National Policy Statement)? What are the potential benefits and risks?

No specific OLW comment

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How can these policies best assist decision-makers consider trade-offs, benefits, costs and alternatives when urban development and subdivision is proposed on highly productive land?

No specific OLW comment

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Should the policies extend beyond rural lifestyle subdivision and urban development to large scale rural industries operations on highly productive land? Why/why not?

No specific OLW comment

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*Specific questions*

*Section 5.5: Interpretation*

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

No specific OLW comment

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

No specific OLW comment

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Should there be minimum threshold for highly productive land (i.e. as a percentage of site or minimum hectares)? Why/why not?

No specific OLW comment

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*Specific questions*

*Section 5.6: Implementation [page 52]*

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Do you think a planning standard is needed to support the consistent implementation of some proposals in this document?

No specific OLW comment

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If yes, what specific provisions do you consider are effectively delivered via a planning standard tool?

No specific OLW comment

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*Specific questions*

*Section 5.7: Timeframes [page 52]*

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What is the most appropriate and workable approach for highly productive land to be identified by council? Should this be sequenced as proposed?

No specific OLW comment

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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?

No specific OLW comment

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