



Proposed National Policy Statement for Highly Productive Land

Submission Template

We would like to hear your views on the proposed National Policy Statement for Highly Productive Land (NPS-HPL).

Please feel free to use this template to prepare your submission. Once complete please email to soils@mpi.govt.nz.

You can also make a submission using the online submission tool. A link to the online submission tool is available at www.mpi.govt.nz/HighlyProductiveLand.

Contact details

Name:

Dr Sally Price

Postal address:

[REDACTED]
[REDACTED]

Phone number:

[REDACTED]

Email address:

[REDACTED]

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

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

NA

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Questions for submitters

The questions for submitters that are included throughout the discussion document are provided below. We encourage you to provide comments to support your answers to the questions below. You do not have to answer all questions for your submission to be considered.

The page numbers mentioned below indicate where further information about the question is located in the discussion document.

Section 2.3: Defining highly productive land [page 19]

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

Values

- Locally grown food
- Increase public connection with the food growing/production process
- Quality sustainably produced meat, fruit, vegetables and other food products.

Benefits

- Consumers know where the food has come from
- Reduced costs of transportation and as a result lower greenhouse gas emissions.

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

- Local green grocers (not supermarket) and farmers markets brings people together to purchase and enjoy fresh food ie fruit, vegetables, meat and other products.
- Increased consumption of healthy, locally sourced food in the community
- Community “sees” good quality food (not just seconds due to the top grade usually being exported).



How maximised: The food producing areas being in the centre of the community (or close by) to allow acces and learning by all.



Section 3.1: Problem statement [page 23]

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

NA

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

NA

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

NA

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

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

- Seems little consideration is given – sprawl is common. The soil component of the highly productive land appears to be not generally thought of highly, yet it is the basis of most of what we do.
- The people that buy the houses often have little understanding of the previous land use (and loss of it).
- Old farms are being swallowed up for housing eg in Lincoln, Selwyn, Canterbury
Rosemerryn Farm is now a Stage 14 housing development, Rosemerryn.
<https://www.google.com/maps/@-43.6420017,172.5038839,15z>
In light of this, the good topsoil built up over generations farming the land is removed from the sections during development and sold, a huge loss of soil carbon.
- Barton Fields subdivison, Birches Rd, Lincoln
<https://www.google.com/maps/@-43.6301038,172.4903512,17z>
was the highly productive Barton Fields Clydesdale Horse stud until a few years ago.



- Also fragmentation of once highly productive grain growing land into lifestyle blocks increasing eg newly developed land on Perymans Rd, opposite Levington Close, between Lincoln and Tai Tapu, Selwyn (centre of the map)
<https://www.google.com/maps/@-43.6538708,172.5225791,15z>
Also see **Figure 1** in the **Appendix of this submission** for an aerial photo of the land prior to development.
- Vegetable production land on the corner of Marshlands and Mairehau Rd, Marshland, Christchurch
<https://www.google.com/maps/@-43.4845416,172.6656992,16z>

appears to be being squeezed by urban development.
Here there are green grocers on a small parcel of land and a huge housing development in behind .

Also see **Figure 2** in the **Appendix of this submission** for a photo from Google Maps showing the spread of the subdivision to close to nearby vegetable production land on the corner of Mairehau and Marshland Roads, Christchurch.

A photo of a portion of the area in question can be found in Polish History of New Zealand 2019, entitled “Open drains along roads are still very much part of the Marshland landscape, this one along Mairehau Road, (formerly named Cemetery then Reeves Roads)”.

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

Thorough mapping of the soils of the highly productive land areas should be available to provide the correct information on soil type so that these soils are not concreted over unnecessarily with housing developments. Council officers need to regard highly productive land as the highest priority to protect, as these (and all soils) are a non renewable resource and are very difficult or impossible to replace.



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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?

Housing/lifestyle block developments seem to take priority. Highly productive land for sustainable food production needs to be valued more by the wider community.

An example : The recent development of future lifestyle blocks in Perymans Road, Lincoln, Selwyn, Canterbury This has occurred on land which was highly productive grain growing land until its very recent development, reflective of Lincoln once being the site of one of the biggest flour mills (est.1864) in Canterbury (Lincoln Historical Walk 2017).

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

It should be given equal consideration to its retention as a workable unit as the development of housing needs.

Section 3.4: Reverse sensitivity [page 26]

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

Education of the new residents (or when the sections are being sold)- provides greater basis for understanding, appreciation and tolerance.

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

Factoring in appropriate sized buffer zones between the two land uses so that both can continue alongside each other.



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

Do you agree that there is a problem? Has it been accurately reflected in this document?
Yes there is a big problem. People on the whole are not as connected to the land as they once were a couple of generations ago and hence largely don't understand or recognise that the loss of highly productive soils is important. They buy their food from the supermarket with little consideration of where it comes from, as their lives are too busy to grow food and the like. The most important consideration is a new home in the "country". If we continue to loose our productive land to other uses, New Zealander's may become largely reliant on imports to feed themselves.

Are you aware of other problems facing highly productive land?
Yes, this land when animals are sometimes farmed intensively is being put under too much pressure with compaction issues, the resulting poor drainage, nutrient loss and increased emissions of greenhouse gases. Landuse type needs better matched with soil type and the limitations of the land recognised as "not one size fits all".

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

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

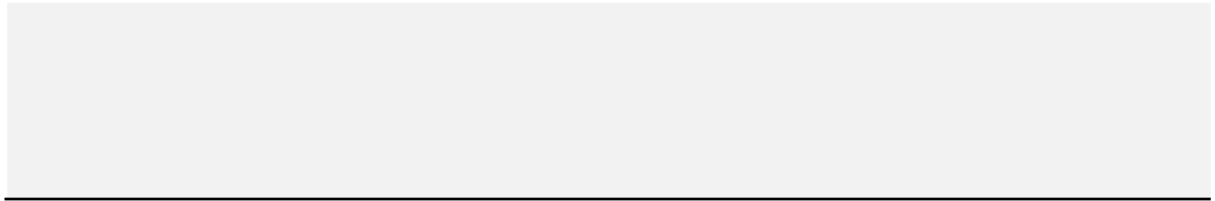
NA

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

NA

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

NA





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

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

Versatile soils should be the focus. Highly productive land zones can change and this would make planning more complex. Versatile soils are just that and are always found in the same localities making decision making processes potentially easier.

Should the focus of the National Policy Statement be on primary production generally or on certain types of food production activities? Why/why not?

Primary production generally. No one type of food product is more important than the other as all New Zealand produced food has a high value.

Section 5.3 The scope of the proposal [page 35]

Do you support the scope of the proposal to focus on land use planning issues affecting highly productive land? Why/why not?

Yes social issues eg housing are important, but equally important is our ability to feed our people with good quality locally grown food at a reasonable price for the long term. Improved land planning processes can provide clear guidelines so as not “trade in” our land resource for little or no productive gain to the wider community once private houses are built on it.

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

Add: 1. Organic soil types are fragile and oxidise rapidly, but are often highly sort after for food production. Marshland, Christchurch where soils of this type are naturally found, has been a premier onion and carrot growing area for a long time (Polish History New Zealand 2019). These soils need to be protected.



Add 2: Certified organic production areas eg Biogrow/Demeter farms. These production systems take a long time to be certified and so need special protection from landuse change.

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?

NA

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

Nationally applied mechanism to get greater consistency of implementation across all authorities.

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?

That highly productive land be better valued by all. A greater appreciation for what lies under our feet is important and is not to be taken for granted as a resource. The primary schools do encourage children to grow fruit and vegetables in their school gardens (Orchards in Schools, 2019), which is a start and needs to be followed through with.

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?

The highly productive land can be identified by mapping (satellite etc) and where versatile soils are involved, verification with field testing as maps are not always true to type as soils are highly variable. Also using statistics eg Ministry for Primary Industries website



<https://www.mpi.govt.nz/news-and-resources/open-data-and-forecasting/agriculture/>

By whom should be identifying the highly productive land....a mixture of people with expertise in soil mapping, soil science and land based statistics in New Zealand.

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

NA

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?

Pros

- Secures a valuable resource for current and future food production
- Ensures that New Zealander's do not have to be reliant on imported foodstuffs of sometimes unknown origin
- Land can be managed appropriately to maintain quality and quality production.

Cons

- Can take away housing land near town centres and increase the potential for intensification.
- Can result in people having to commute greater distances.

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)?

NA



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?

NA

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

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

NA

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?

NA



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?

Buffers and setbacks as stated and education of potential neighbours before purchasing the land regarding expectations eg there may be noise between 5 am and 6am during harvest time for a particular crop.

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?

NA

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

NA

Section 5.6 Implementation [page 52]

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

NA





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?

NA

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?

NA

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

I don't necessarily believe that future urban areas should be excluded, planning adjustments can be made to accommodate for example on page 68, CaseStudy: Selwyn District (Ministry of Primary Industries 2019). Intensification of housing should also be considered.

Specific questions

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

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

The case by case approach is appropriate as discussed on page 37, (Ministry of Primary Industries 2019).



Should the objectives provide more or less guidance on what is “inappropriate subdivision, use and development” on highly productive land? Why/why not?

I think ‘inappropriate subdivision, use and development’ needs to be clearly defined (for territorial authorities reference) as this is potentially almost as detrimental as the loss of highly productive land to housing.

Specific questions

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

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

Pros

- More accurate understanding of the nature of highly productive land and its location
- Only need to do the bulk of the work once.

Cons

- Potentially costly
- May require field testing to verify
- Will need to update maps/resources regularly as land use change is a constant occurrence.

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

Definitely district level. The soils underlying the highly productive land are often highly variable and unique to their location. Regional scale is too broad.

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



Mapping expertise is present at research institutes such as Landcare Research. Satellite data is probably required and costs would be involved with access to it. Field sampling may be required to verify mapping and can be costly.

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

Close consultation with scientists who work in the field of soil mapping and soil scientists with an understanding of the impacts of landuse change.



Specific questions

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

Should there be a default definition of highly productive land based on the LUC until councils identify this? Why/why not?

Yes councils should implement protection of highly productive land as soon as possible and if this (the LUC) is a means, then the councils should be able to use it.

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

Mandatory

- History of use and understanding of yields under ideal conditions.
- Access to a good quality reliable water supply.
- Special mention about protecting Certified Organic land as difficult and time consuming to convert other land once the organic certification lost and to other uses.

Optional

- Topography – Usually flat land has a higher productive value (not always, eg *Pinus Radiata*, grapes on hill slopes).

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?

Risk

Crops are often as good as useless without a reliable, available, good quality water supply (some crops eg *Pinus radiata*, grapes not necessary). Also water is essential for stock.

Benefit

A good quality, reliable water supply (under all weather conditions) will grow better crops and healthy stock.



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, when studying the land use capability classification, LUC Class 3 is still considered good multiple use land and has a high to moderate value for primary production like LUC Class 2 land.



Specific questions

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

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

NA

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?

These two policy statements need to work hand in hand.

Specific questions

Policy 4: Rural subdivision and fragmentation [page 46]

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?

Probably the question is "Should subdivision be permitted at all on highly productive land?" Once it (subdivision) is done it is difficult to return to previous land uses as crop/animal production often requires scale to be economic.

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. It is not about squeezing every last bit of production out of what elite soils we have. Appropriate management of 'lots' of land for long term, sustainable food production is key.



Specific questions

Policy 5: Reverse sensitivity [page 47]

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

Implement buffer zones and education of new residents in the subdivisions, see earlier, regarding question on Section 3.4 p 26.

Specific questions

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

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?

NA

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?

NA

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



Yes, all highly productive land is valuable. There can be an added potential of the land being contaminated by industry and once this occurs it is often very difficult and costly to remediate.



Specific questions

Section 5.5: Interpretation

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

NA

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

NA

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

Yes, see earlier answer regarding Specific questions: Policy 4, p 46.

Specific questions

Section 5.6: Implementation [page 52]

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

NA

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

NA



Specific questions

Section 5.7: Timeframes [page 52]

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

Consult and employ local experts in the area of highly productive land including mapping and soil scientists to get it right the first time. Ongoing refinement will likely be required.

Yes the sequence seems workable.

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?

The suggested timeframe seems appropriate on p52 with councils using the LUC classes as an interim measure while the NPS or other means is brought into force.



Please use the space below to provide any additional comments you may have.

I am Sally Price, I have a PhD in Soil Science and work at Lincoln University – I would have attended the Christchurch meeting on 10 September, however I could not [REDACTED]. I am willing to provide any further information/assistance as required as this is a very important issue. I would also be interested in being informed of how the work on protecting our highly productive and versatile soils proceeds. Thank you for the opportunity to make a submission.

References

Lincoln Historical Walks (2017) <http://www.sensationseelwyn.co.nz/wp-content/uploads/2017/09/Lincoln-Historical-Walks-Brochure-2017.pdf>
Last accessed 4 October 2019

Ministry for Primary Industries (2019) Valuing Highly Productive Land. Ministry of Primary Industries 69p.

Ministry for Primary Industries (2019) <https://www.mpi.govt.nz/news-and-resources/open-data-and-forecasting/agriculture/>
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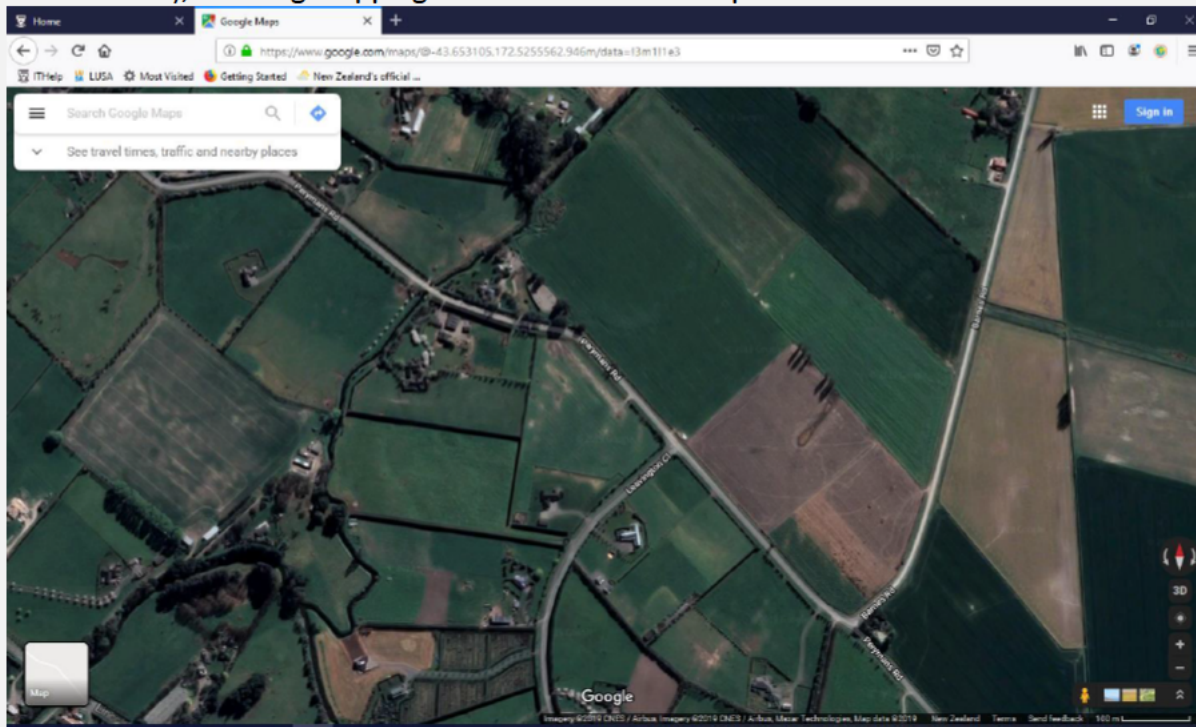
Orchards in schools (2019) <https://www.chsgardens.co.nz/orchards-in-schools/>
Last accessed 9 October 2019

Polish History New Zealand (2019) <https://polishhistorynewzealand.org/marshland/>
Last accessed 8 October 2019



Appendix

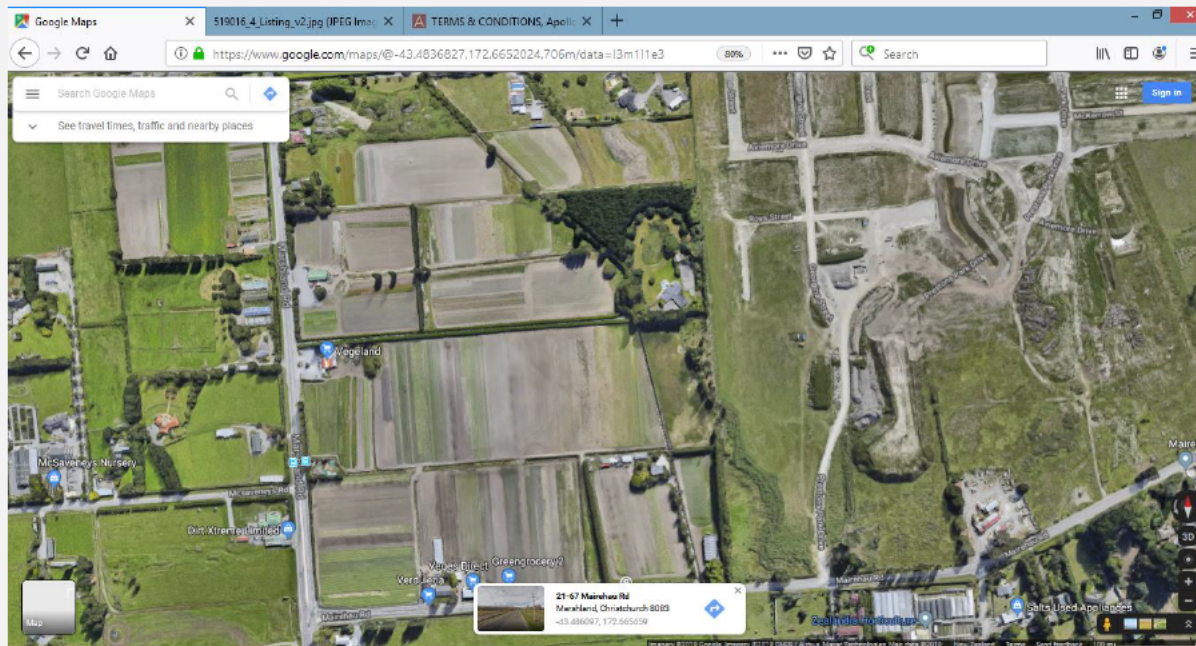
Figure 1: Perymans Road, and opposite Leavington Close in centre (between Tai Tapu and Lincoln 7672), showing cropping land use before development.



Source: Google Maps, last accessed 10 October 2019



Figure 2: Corner Marshlands Rd and Mairehau Rd, Marshland, Christchurch, showing the spread of urban housing (right hand side) close to vegetable producing land (centre left).



Source: Google Maps, last accessed 9 October 2019

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.