

Submission on Proposed National Policy Statement for Highly Productive Land

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Introduction

I started my Commercial Vegetable Growing business with my Father back in 1977. I leased the family farm of 15 hectares off Mum and Dad located in Bombay, South Auckland.

Over the last 40 years my family has strategically purchased land in the Bombay Region.

Our family split the land holding and growing/marketing operation in 2007. This is where Sutherland Produce Limited was born. So, in fact, our family lease our land holding to the growing company. This is not a unique situation - you will find that many Growers' businesses are set up like this.

Our family now owns 400 hectares of land in the Bombay, Ramarama and Pukekohe area which we lease back to Sutherland Produce Ltd.

In late 2013 LeaderBrand Produce Ltd (www.leaderbrand.co.nz) took a shareholding in our growing company. They are a multi-regional based vegetable growing company. To have geographical spread, part of their vegetable production is now grown in this area by Sutherland Produce.

Sutherland Produce Ltd operates a large market garden operation in the Bombay area with approximately 400 ha of market garden under their management.

They are the largest supplier of green vegetables to the domestic market in the area.

They are the main supplier of Broccoli, Lettuce and Silverbeet to the Countdown Supermarket Chain in the North Island.

The close proximity of Bombay to the Auckland Distribution Centres gives us a distinct advantage in supplying fresh vegetables to this market.

I would be happy to further discuss any of my recommendations as outlined in my submission.

Submission

I believe there is much work to be done creating the correct data to classify Highly Productive Land.

The improved data should include:

- Accurate soil mapping taking into account:
- Environmental Mapping of influencing factors taking into account:
- Extreme Climatic and environmental Risk Mapping taking into account:

The classification must take into account:

- Soil Characteristics.
- Soil and land suitability for purpose
- Environmental impact.
- Viability after considering Social and Environmental factors.

It is absolutely critical that **ENVIRONMENTAL IMPACT** is included in HPL.

It is becoming increasingly important in our lives and must be seen as a **FACTOR** not a regulation.

The protection of the Highly Productive Land if it involved mapping, would need to be continually updated because otherwise it would always be historic.

Identification of Highly Productive Land could be done on a Scoring system to give greater guidance and accountability.

Interim measures involving LUC 1-3 are unreliable and unnecessary as councils are accountable to Government and society, so should rule responsibly in the interim.

The legislating in the Resource Management Act should not be done until all measures are put into place regarding classification.

Policy regarding legislating against District and Private Plan Changes is wrong as it stops due process and although it is seen to be an interim measure it will be counterproductive in protecting HPL and releasing appropriate land for Urbanisation.

Only land that has gone through the resource consent process should be put aside from new policy. Land that has only been zoned or put aside should come under HPL policy as it was often looked at with old inaccurate data and does not include environmental factors. We must ensure people have rights of opinions under due process.

Desired outcome:

A policy which highlights the importance of the protection of HPL while taking into account the factors that enable land to be highly productive, its effect on the Environment and where necessary encourages its transition to less impacting purposes.

Discussion Questions

SECTION 2.3: DEFINING HIGHLY PRODUCTIVE LAND (PG 19)	
What are the values and benefits associated with highly productive land?	<p>The values and benefits associated with horticultural use of highly productive land include:</p> <ul style="list-style-type: none"> • Economic benefits – employment, export, industry growth potential, infrastructure needs • Climate change/transition to low economy • Health outcomes and social well-being – adverse health outcomes result from not eating enough fruit and vegetables • Fresh food/ food supply – national food supply and domestic food security; this will become more important with population growth • Horticulture is an efficient land use and contributes to rural amenity <p>We believe the values can be summarised as below. These values and benefits need to be taken into account in deciding HPL.</p> <p>A scored assessment of a combination of significant sustainable factors and impacts.</p> <ul style="list-style-type: none"> • Land Resource Sustainability • Environmental Sustainability • Economic Sustainability • Social Sustainability
What are the values and benefits associated with existing food growing hubs and how can these be maximised?	<p>In our area the values and benefits of existing food growing hubs are:</p> <ul style="list-style-type: none"> • Proximity to current and future markets • Knowledge of localised conditions • Existing infrastructure • Job stability and flow on effects to businesses such as tractor suppliers, engineers, workshops, seed and chemical suppliers.

SECTION 3.1: PROBLEM STATEMENT (PG 23)	
Does the RMA framework provide sufficient clarity and direction on how highly productive land should be managed? Why/why not?	<ul style="list-style-type: none"> No - it does not have sufficient clarity. It needs to take into consideration the proposed National Environmental Standard for Freshwater (NES-FW) and National Policy Statement for Freshwater Management (NPS-FM). Some of the proposals in these policies would make it no longer viable to operate.
Does the RMA framework provide sufficient clarity on how highly productive land should be considered alongside competing uses? Why/why not?	<ul style="list-style-type: none"> No – it needs more clarity. There is not sufficient guidance on how highly productive land should be considered alongside competing uses. We would hope the introduction of the NPS-HPL will provide the clarity.
How are values and wider benefits of highly productive land being considered in planning and consenting processes?	<ul style="list-style-type: none"> They are at present being addressed by local government but the biggest restraint is that they are acting and making decisions based on old inaccurate data. The decisions they have made in their 30 year plans do not hold relevance as they will not have taken into account the new wider values associated with HPL or new more accurate soil classification. Guidelines, not regulation are the most effective way of maintaining values and benefits as the factors making up HPL are a moving target.

SECTION 3.2: URBAN EXPANSION ON TO HIGHLY PRODUCTIVE LAND (PG 24)	
How is highly productive land currently considered when providing urban expansion? Can you provide examples?	<ul style="list-style-type: none"> Old inaccurate LUC data going back 50 years old. Too much planning on Google earth where slope is and other factors not taken into consideration. Influencing factors from old District Plans where many were adopted under the new Auckland supercity structure. Too much emphasis put on the RUB and an inequitable overvaluation of land resulting.
How should highly productive land be considered when planning for future urban expansion?	<p>A scored assessment of a combination of significant sustainable factors and impacts.</p> <p>Land Resource Sustainability:</p> <ul style="list-style-type: none"> Specific Type of soil – e.g. volcanic Slope Special Climatic Qualities

- Special Climatic Issues or likelihood of events
- Ability to hold or release nutrients
- Water availability
- Susceptibility to disease or any other mitigating factors

Environmental Sustainability:

1. Clean Streams Impact

- Ability to comply with Good Management Practise for sediment control
- Likelihood of a major event causing excess sediment incident
- Stream and Waterways setback affecting ability to operate
- Effect of Global Warming on risk
- Ability of Soil to drop out undesired sediment
- Ability to comply with nutrient leaching or runoff levels
- Ability to grow viable crops on soil type under fertilizer regulations
- Ability to control Pests associated with Environmental Plantings

2. Carbon Footprint

- What would be the effect on Carbon footprint?

Economic Sustainability:

1. Continuing Viability of Business

- Effect of Streams and Waterways Setbacks in increasing land and operational cost.
- Costs of Environmental Plantings.
- Cost of Greenhouse Emissions Legislation.
- Business size after adjustments.
- Setup and ongoing costs of meeting requirements.

2. Economic effect on the Region and Nation.

- Cost Impact to Government or Regional Council on location in relation to Infrastructure.

	Social Sustainability: <ul style="list-style-type: none"> • Need • Social Impact • Proximity to desired resources • Reverse Sensitivity • Infrastructure viability and Cost effectiveness. • Labour availability. • Effect of Noise, Odour, and Pollutants on Community
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SECTION 3.3: FRAGMENTATION OF HIGHLY PRODUCTIVE LAND (PG 25)	
How is highly productive land currently considered when providing for rural-lifestyle development? Can you provide examples?	<ul style="list-style-type: none"> • In Auckland region, land has been put aside for Countryside living. • In most part it is on land that would not be economic to farm and productive capacity has been considered. • Without accurate soil data and taking into account the proposed National Environmental Standard for Freshwater (NES-FW) and National Policy Statement for Freshwater Management (NPS-FM) it may be prudent to set more land aside to create a buffer between the zones and lessen negative sensitivity. • However, at times Council has protected land from becoming zoned rural lifestyle purely for the reason it is already cultivated and brown. These soils should not be classified as highly productive just because they are cultivated as they have the same potential as those in pasture. Often these soils have steeper gradient and are more prone to sediment loss and will come under scrutiny under the proposed National Environmental Standard for Freshwater (NES-FW) and National Policy Statement for Freshwater Management (NPS-FM).
How should highly productive land be considered when providing for rural-lifestyle development?	<ul style="list-style-type: none"> • Accurate soil classification data. • Land resource Sustainability (see section 3.2 comments) • Environmental Sustainability (see section 3.2 comments) • Economic viability of land use (see section 3.2 comments) • Requirement of buffer zones helping with negative sensitivity issues. • Where grouping of Rural lifestyle development is socially the best option.

	<ul style="list-style-type: none"> • Where the impact of Urban development would be visually enhanced by less intense development and the land use is no longer viable. • Where cost of infrastructure or isolation dictates it is a better option than urban development. <p>The location of highly productive land should be considered when zones are delineated that allow (via resource consent) rural-lifestyle development and where possible, such zones should avoid highly productive land. With regards to resource consent processes, rural-lifestyle development should only be allowed on land identified as being highly productive if it can be shown (by an appropriately qualified person) that the identification of it as highly productive is not accurate at the individual property level, or that there are benefits for the productive capacity of HPL and other benefits and these benefits exceed the benefit of using alternative land for rural-lifestyle development.</p>
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SECTION 3.4: REVERSE SENSITIVITY (PAGE 26)	
How should the tensions between primary production activities and potentially incompatible activities best be managed?	<ul style="list-style-type: none"> • Best managed by having buffers of rural lifestyle, parks and reserves, of less intensive housing as buffers. • Plan to discourage having isolated grouping of potentially incompatible groups. • Discourage the increased development of Rural Activities likely to cause tensions where ever practicable. (Eg do not allow increased development of chicken rearing facilities close to potential urban developments.) • Where there is reverse sensitivity and the issues cannot be resolved the HPL status of the land should be reviewed and the zone moved to allow Urban development.
How can reverse sensitivity issues at the rural-urban interface best be managed?	<ul style="list-style-type: none"> • As above and involving sector groups • There should be an understanding that people have a choice on where they live more than the Primary producer choosing where and how he farms. • Therefore priority must be given to the HPL to be able to carry out his obligation to farm on that land especially if the action is historic. <p>There needs to be a clear framework for managing/supporting areas where urban development directly adjoins Rural Zoned land. Methods to manage reverse sensitivity include:</p>

	<ul style="list-style-type: none"> • Setbacks for new residential activity in the rural production zone and setbacks on the boundaries of the zone (applying within the adjacent zone), • Buffer strip requirements, which could include landscaping requirements • Having some physical separation definitely helps manage reverse sensitivity issues • Establishing clear expectations of what are realistic rural character and amenity expectations through district plan provisions <p>It is necessary as a grower to ensure that we undertake our productive activities in accordance with industry good management practice to ensure that reverse sensitivity issues are minimised as far as practicable, and where appropriate, ensuring that (where applicable) regional and district plans are clear in their requirements of growers helps make expectations clear.</p>
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SECTION 3.5: THESE ISSUES ARE BEEN SEEN THROUGHOUT NEW ZEALAND (PG 26)	
Do you agree that there is a problem? Has it been accurately reflected in this document?	<ul style="list-style-type: none"> • Yes, we agree there is a problem. • It has been reasonably well documented. • As new generations emerge there is less understanding where fresh food actually comes from and the process to grow it.
Are you aware of other problems facing highly productive land?	<p>Other issues that face HPL in horticultural use include:</p> <ul style="list-style-type: none"> • Cumulative effects of proposed policies and regulations including potential water and nutrient restrictions on highly productive land. • Increased land values that flow through to rates, when land is zoned or identified for future development, but also due to speculation around future development potential. • Cumulative effect of municipal water takes, that often have priority in plans • Urbanisation degrades water quality through increasing impervious surfaces and the discharge of contaminants and can impact on the resource required to realise the productive potential of rural land • Flood protection and land drainage often serving both urban and HPL, changes stream hydrology and reduce ecosystem health and water quality • Restrictive rules regarding supporting structures that are an inherent part of some horticultural operations (e.g. crop protection structures)

	<ul style="list-style-type: none"> Increasing restrictions on land use change (as land use change by many interest groups is considered to result in intensification (irrespective of the actual impact on land use intensification of a particular activity) which can make realising the value of highly productive land difficult, even in cases where land use change will potentially decrease the nutrient loss from the land Availability of water (acknowledging that there is a need to limit new water in areas where limits appear to have been reached) however increasing restrictions on the ability to transfer water can again make realising the productive potential of highly productive land difficult
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SECTION 4.5: PREFERRED OPTION - A NATIONAL POLICY STATEMENT (PG 31)	
Which option do you think would be the most effective to address the problems identified in Chapter Three? Why?	<ul style="list-style-type: none"> Option one, NPS is the preferred option without the interim measures (LUC) which are unnecessary and unworkable. Legislation would not need to be rushed and NPS-HPL should be worked in conjunction with proposed National Environmental Standard for Freshwater (NES-FW) and National Policy Statement for Freshwater Management (NPS-FM). A schedule 1 process through the Regional Councils needs to be followed.
Are there other pros and cons of a National Policy Statement that should be considered?	<ul style="list-style-type: none"> A National Environmental Standard would not allow for variability across the country It requires, but also enables each region and district to identify the highly productive land located within their region/district and make decisions about how it is best managed. It demonstrates the importance of considering highly productive land, which making changes to the proposed NPS for urban development would not, and it is argued an NES also does not highlight as well
Are there other options not identified in this chapter that could be more effective?	A National Environmental Standard specific to Commercial Vegetable Production could be more effective for our sector moving forward.

SECTION 5.2: PURPOSE OF THE PROPOSED NATIONAL POLICY STATEMENT (PG 34)	
Should the focus of the National Policy Statement be on versatile soils or highly productive land more broadly? Why/why not?	We support the focus to be on highly productive land rather than versatile soils. See section 3.2 for comments on Land Resource Sustainability, Environmental Sustainability, Economic Sustainability and Social Sustainability.
Should the focus of the National Policy Statement be on primary production generally or on certain types of food production activities? Why/why not?	The focus of the NPS should be on primary production, but with particular emphasis on food. All primary production is important to the national economy and land that is highly productive for one purpose would not be particularly for another. I.e. wine production and vegetable growing. Food production should have a greater emphasis due to its importance for domestic supply and food security.
SECTION 5.3 THE SCOPE OF THE PROPOSAL (PG 35)	
Do you support the scope of the proposal to focus on land use planning issues affecting highly productive land? Why/why not?	Yes, to some degree although needs to consider all elements contributing to HPL and determine most viable use of that land.
What matters, if any, should be added to or excluded from the scope of the National Policy Statement? Why?	<ul style="list-style-type: none"> • The scope has a very historic focus and has little relevance in solving future issues. • It needs to encompass current and future issues such as accurate soil value information with values that are based on soil type grade. It also needs to consider the ability to farm under different farm types and proposed National Environmental Standard for Freshwater (NES-FW) and National Policy Statement for Freshwater Management (NPS-FM).
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?	<ul style="list-style-type: none"> • Do not agree that land earmarked under a Unitary plan scheme or any other Council Policy should be exempt from the NPS-HPL. • These zones were done based on inaccurate LUC data; 50 years old. • Too much planning on Google earth where slope is and other factors not taken into consideration. • Influencing factors from old District Plans where many were adopted under new larger council structures. • Too much emphasis put on the RUB and an inequitable overvaluation of land resulting. • With a narrow mindset, too much land has been set aside that has issues such as infrastructure.

	<ul style="list-style-type: none"> • This coupled with the fact that the future zoning inflated the value means that much of the land will never be developed or if so, never to affordable housing. • The only land set aside should be that already gone through the Resource Consent process. • To do it any other way would be taking away rights under due process. • Some of the decisions around land being set aside have been made on the basis of old incorrect LUC data and topography maps. • Land would be protected under the new legislation until Council Plans came into effect by issuing a directive that new Resource Consents and land set aside for Urbanization would take into account the new definition.
Should the National Policy Statement apply nationally or target areas where the pressures on highly productive land are greater?	The NPS-HPL should apply nationally and should be used by Regional Councils as guidelines.
SPECIFIC QUESTIONS FOR SECTION 5.3	
How should the National Policy Statement best influence plan preparation and decision-making on resource consents and private plan changes?	By giving good guidance and creating a scoring system to ensure all factors relating to HPL are taken into account.
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, the policy statements and plans need to go through the Schedule 1 process. The current LUC information poses risks as the information is inaccurate. We should have the opportunity to challenge, review and update the information.
What areas of land, if any, should be excluded from the scope of the proposed National Policy Statement? Why?	Only land that has already gone through resource consent should be excluded as it has gone through process at the time. All others should be taken into account as long as all factors as indicated in this submission are taken into account.

SECTION 5.4: THE PROPOSED NATIONAL POLICY STATEMENT (PG 37)	
What would an ideal outcome be for the management of highly productive land for current and future generations?	<ul style="list-style-type: none"> • This Policy should not be dealt with alone but in conjunction with other future and existing environmental law and proposals (proposed National Environmental Standard for Freshwater (NES-FW) and National Policy Statement for Freshwater Management (NPS-FM)). • The outcome would be Highly Productive Value or Highly Valued land as it is the value we are taking into account, with all factors including land ,sea, climate, environment and ability to feed the nation. • The focus of the outcome should be to set guidelines that the value or effects from Highly Productive land are taken into account in future planning and consents. • Mapping of Highly Productive land should not be encouraged as the restraints around it are a moving target and must be dealt with likewise. • Some of the poor planning thus far has been a result of poor and old information. • Establish a guideline that can be monitored and followed. • Create a scoring system for Councils to ensure they are taking into account all effects when making decisions. • Do not put in any interim measures as they are all based on old information. • As they are guidelines not protections it would be expected that councils take into account the new measures when dealing with resource management and future zoning. • A Nationwide soil study should be done with emphasis on types, gradients, potential use. Environmental factors such as leaching and runoff must be taken into account. • This information would be taken a step further with it being linked to its potential use.
SPECIFIC QUESTIONS FOR SECTION 5.4	
What level of direction versus flexibility should the objectives provide to maintain the availability of highly productive land for primary production?	<ul style="list-style-type: none"> • Good guidance and accountability is essential. • A scoring system as suggested above would help Councils take into account all effects when making decisions.

Should the objectives provide more or less guidance on what is “inappropriate subdivision, use and development” on highly productive land? Why/why not?	<ul style="list-style-type: none"> • As above.
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POLICY 1: IDENTIFICATION OF HIGHLY PRODUCTIVE LAND (PG 41)	
If highly productive land is to be identified, how should this be done and by whom?	<ul style="list-style-type: none"> • Highly Productive Land should not be identified using the LUC system – even if it is an interim measure. I do not consider that regional councils are adequately resourced to cater for additional mapping requirements, again compounded by the excessive resourcing requirements imposed by numerous pieces of legislation currently proposed. • I support a soil identification process. <ul style="list-style-type: none"> ○ This would have guidelines set by Government in consultation process with the primary body groups involved to establish the most ideal soil for their particular production. ○ Identification be carried out by local government and stakeholders involving professional opinion. ○ If land owners wished to get specific identification within their own properties they should be encouraged to do so. • I support an environmental risk identification process. <ul style="list-style-type: none"> ○ This would have guidelines set by Government in consultation process with the primary body groups involved to establish the most ideal soil for their particular production. ○ Identification would be carried out by local government and stakeholders involving professional opinion. ○ If land owners wished to get specific identification within their own properties they should be encouraged to do so. ○ The process would be linked to their FEP's.
Are the proposed criteria all relevant and important considerations for identifying highly productive land? Why/why not?	No not relevant at all. See section 3.2.

SPECIFIC QUESTIONS FOR POLICY 1	
What are the pros and cons of requiring highly productive land to be spatially identified?	<ul style="list-style-type: none"> • We believe highly productive land should be spatially identified, this would provide certainty for investment in rural production systems and for plan users. • There should be the opportunity for the maps to be updated outside of the planning cycle and be kept as living documents for the purposes of assessing private plan changes and subdivision applications. • A risk of spatially identifying HPL is that if this exercise is not done comprehensively to include a broad range of factors, land that is not identified will not be afforded protection or protected unnecessarily; this emphasises the importance of the Appendix A criteria and the process undertaken. • As any classification system will have pros and cons, pathways for identifying new land that isn't spatially identified as being highly productive, but meets the criteria, and therefore should be afforded the same level of protection as land that is spatially identified; needs to be clearly addressed in the NPS. • They would definitely need to be a living document. • They would need to identify the suitability for a particular Primary Production type.
Is the identification of highly productive land best done at the regional or district level? Why?	<ul style="list-style-type: none"> • Identification done at the regional level would ensure consistency in approach across a region, and expertise related to land generally sits within regional councils rather than at district level. However if an approach is agreed and all districts within a region agree to follow it, then the issue of consistency could be addressed. <p>Ultimately, the identification of highly productive land should be done by appropriately qualified persons, in a cost-effective manner, and how that is best achieved in each area of the country could vary.</p>

What are the likely costs and effort involved in identifying highly productive land in your region?	<ul style="list-style-type: none"> • Huge costs are involved, and I believe the Regional Council is not set up to cope with this. I am worried that these costs will then be forwarded onto rate payers. Instead the Government should be allocating funds to help with this process.
What guidance and technical assistance do you think will be beneficial to help councils identify highly productive land?	<ul style="list-style-type: none"> • Clear guidelines from Government with technical assistance and training to achieve these. • Possibly leading to accredited people in Specialising in HPL rating once the criteria is established. • The HPL soil climatic slope and Primary use attributes should be considered separately from environmental impact then combined together.
SPECIFIC QUESTIONS FOR APPENDIX A (CRITERIA TO IDENTIFY HIGHLY PRODUCTIVE LAND)	
Should there be a default definition of highly productive land based on the LUC until councils identify this? Why/why not?	<ul style="list-style-type: none"> • There should not be a default definition. • The LUC grading system is old data and enough incorrect decisions have been based on it. • The land use when it was introduced has no bearing on today. • This system is 50 years old and was done with old technology • It is often inaccurate in localized conditions and does not take into account many influencing factors such as slope, climate and water availability. • We have several examples of inaccurate mapping in the Bombay region <p>The 1-3 categorization is too broad and encompasses too much land.</p> <ul style="list-style-type: none"> • In the actual LUC rating, it also has other elements applicable to the type attached which often renders it unsuitable, but these are not taken into account under the rating. • Some of the decisions around land being set aside have been made on the basis of old incorrect LUC data and topography maps. • Land would be protected under the new legislation until Council Plans came into effect by issuing a directive that new Resource Consents and land set aside for Urbanization would take into account the new Definition.
What are the key considerations to consider when identifying highly productive land? What factors should be mandatory or optional to consider?	See section 3.2.

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?	<ul style="list-style-type: none"> The NPS-HPL needs to be aligned and must work alongside the proposed National Environmental Standard for Freshwater (NES-FW) and National Policy Statement for Freshwater Management (NPS-FM). They cannot work against each other.
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?	<ul style="list-style-type: none"> Yes, a tiered approach but not using the LUC system. See section 3.2
POLICY 2: MAINTAINING HIGHLY PRODUCTIVE LAND FOR PRIMARY PRODUCTION (PG 42)	
What are the pros and cons associated with prioritising highly productive land for primary production?	Primary production has a different criteria for HPL.

ALIGNMENT WITH THE URBAN GROWTH AGENDA (PG 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)?	<p>All should work in conjunction with each other if designed properly .</p> <ul style="list-style-type: none"> The drafting of particularly the NPS on urban development and the proposed freshwater reforms (especially the NPSFM) will need to be done carefully, and comprehensive cross-checking undertaken once the form of each of the relevant instruments is known to ensure that consistency is achieved between all relevant documents.
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?	Designed properly they will form guidelines for Councils which will then decide the best option for the present and future while respecting the value.

POLICY 3: NEW URBAN DEVELOPMENT ON HIGHLY PRODUCTIVE LAND (PG 45)	
How should highly productive land be considered when identifying areas for urban expansion?	By having a scoring system as suggested above.
SPECIFIC QUESTIONS FOR POLICY 3	
How can this policy best encourage proactive and transparent consideration of highly productive land when identifying areas for new urban development and growth?	By using a scoring method.
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?	By each being done together and respecting each others interests.

POLICY 4: RURAL SUBDIVISION AND FRAGMENTATION (PG 46)	
How should the National Policy Statement direct the management of rural subdivision and fragmentation on highly productive land?	Maintain productive capacity of HPL in sizes to avoid fragmentation but at times use this as a buffer between HPL and Urban.
SPECIFIC QUESTIONS FOR POLICY 4	
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?	Although there are potentially some benefits in the NPS providing direction about how to manage subdivision on highly productive land (such as national consistency, and clarity about what can/not be done), there is potentially a need for local authorities to have some flexibility in how they deal with this matter to ensure that they have consistency and coherence within their plans, and can tailor their plan provisions to the particular circumstances that exist within their local area.
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?	<p>Yes, if the mechanisms to achieve these types of things can be simplified/streamlined in any way then that would be helpful, as regulatory barriers certainly do not enable the protection of HPL.</p> <p>Mechanisms such as transferable development rights would potentially be beneficial</p>

POLICY 5: REVERSE SENSITIVITY (PG 47)	
How should the National Policy Statement direct the management of reverse sensitivity effects on and adjacent to highly productive land?	<p>Most councils with larger areas of highly productive land already have guidance about how reverse sensitive should be managed.</p> <p>The current wording of Policy 5 suggests that new sensitive and potentially incompatible activities could establish on highly productive land (subsection b) however we believe that avoidance should be the first response.</p>
SPECIFIC QUESTIONS FOR POLICY 5	
How can the National Policy Statement best manage reverse sensitivity effects within and adjacent to highly productive land?	<ul style="list-style-type: none"> • Most councils with larger areas of highly productive land already have guidance about how reverse sensitives should be managed. • The current wording of Policy 5 suggests that new sensitive and potentially incompatible activities could establish on highly productive land (subsection b) however we believe that avoidance should be the first response

POLICY 6 & 7: CONSIDERATION OF PRIVATE PLAN CHANGES AND RESOURCE CONSENT APPLICATIONS ON HIGHLY PRODUCTIVE LAND (PG 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?	<p>Guidance is given to Council within the Policy to highly consider the value of any HPL and associated impacts in their decision. Any Legislation around this complicates the matter.</p> <p>It has to go through a resource management process to ensure everyone has rights.</p>
How should the National Policy Statement guide decision-making on resource consent applications for subdivision and urban expansion on highly productive land?	As above.
SPECIFIC QUESTIONS FOR POLICY 6 & 7	
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?	<ul style="list-style-type: none"> • We are totally against Policy 6 and 7 totally. • This is stripping people of their rights of due process. • The consequence of this will be to limit Council and societies ability to utilize the most suitable and cost effective areas for urbanisation and protect the wrong areas. • This would in effect protect land wrongfully included in some district plans based on old regulations and information being protected.

	<ul style="list-style-type: none"> It would further increase the value of this land and with much of it already having unfeasable infrastructure and social issues and make affordable housing even harder.
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?	These will not be helpful only interrupt new policy.
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 – any development that is potentially going to remove highly productive land from primary production should be considered in the context of its impact on the overall HPL resource.

SECTION 5.5: INTERPRETATION (PG 50)	
Do any of the draft definitions in the National Policy Statement need further clarification? If so, How?	<ul style="list-style-type: none"> What is a land parcel as referred to in the definition of highly productive land? What do “initial processing” and “different product” mean in the definition of primary production.
Are there other key terms in the National Policy Statement that should be defined and, if so, how?	Refer to recommendations highlighted within my submission.
Should there be a minimum threshold for highly productive land (ie as a percentage of site or minimum hectares)? Why/why not?	No. Should use the scoring system as suggested.
SPECIFIC QUESTIONS FOR SECTION 5.5	
Do any of the draft definitions in the National Policy Statement need further clarification? If so, how?	<ul style="list-style-type: none"> It needs to incorporate some of the suggestions in my submission. It needs to be redrafted in conjunction with the other policies being addressed.
Are there other key terms in the National Policy Statement that should be defined and, if so, how?	<ul style="list-style-type: none"> The terms need to align with other policy being addressed especially incorporating the proposed National Environmental Standard for Freshwater (NES-FW) and National Policy Statement for Freshwater Management (NPS-FM).

Should there be minimum threshold for highly productive land (i.e. as a percentage of site or minimum hectares)? Why/why not?	<ul style="list-style-type: none"> • Yes but this needs careful consideration and is dependent on primary production type. The scoring system should be used. • It would need to involve production groups and again involve environmental policy as the will have an impact.
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SECTION 5.6 IMPLEMENTATION (PG 52)	
What guidance would be useful to support the implementation of the National Policy Statement?	A 'user guide' for both local government, and owners of highly productive land that helps them understand what the impact of the NPS-HPL is, and how it will be implemented.
SPECIFIC QUESTIONS FOR SECTION 5.6	
Do you think a planning standard is needed to support the consistent implementation of some proposals in this document?	Potentially, but the provision of good guidance from central government. It should be targeted at the areas within the NPS where particular issues with consistency of implementation arise.
If yes, what specific provisions do you consider are effectively delivered via a planning standard tool?	<ul style="list-style-type: none"> • The planning tool could best be a Score rated system taking all factors into account giving accountability. • Each part could have a different rating.

SECTION 5.7 TIMEFRAMES (PG 52)	
What is the most appropriate and workable approach for highly productive land to be identified by council? Should this be sequenced as proposed?	<ul style="list-style-type: none"> • Guidelines must come from Central Government first regarding what makes up HPL. • Council will then work with landowners to identify ratings through soil advisors and testing and then assessing environmental factors through Farm Environment Plans. • It should be brought in with new environmental policy.
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?	<ul style="list-style-type: none"> • Do it once and do it right. • If any District Plans or Private Plan changes are proposed in the interim they will have to submit under the ideals of the new policy and have expert opinion ratifying any change. <p>Any new Resource consents would come under the same jurisdiction.</p>