

## WISE RESPONSE SOCIETY: SUBMISSION ON PROPOSED NATIONAL POLICY STATEMENT FOR HIGHLY PRODUCTIVE LAND.

### Submission

1. Several members of the Society **attended the September 9 public meeting** in Dunedin on Highly Productive Land and have perused the full discussion document but we base this submission on the Summary Document.
2. We strongly **endorse the Government's proposal** for a National Policy Statement (NPS) on Valuing Highly Productive Land, by firstly identifying it and then implementing a National Policy to ensure its retention, in perpetuity, for its productive potential.
3. Our highly productive land and associated soils are an **extremely valuable, non-replaceable resource** and of limited extent in this country (see Appendix 1), so it is most important that planning ensures that they are not displaced by other forms of land use, such as expansion of urban areas and also the development of lifestyle blocks, as has been comprehensively assessed in the April 2018 report: "Our Land", produced by MfE and Stats NZ.
4. The 8-class **Land Use Capability Classification** system was completed at a scale of 1 inch : 1 mile by the Water and Soil Division of the Ministry of Works and Development in the 1970's as the prime basis for planning and designing sustainable land use throughout the country and was not infrequently the basis of decisions of the Planning Tribunal under the Town and Country Planning Act, 1977. This classification system was updated in 2009 (see Appendix 1).
5. This **classification system** recognised four classes each of arable (Classes 1-4) and non-arable (Classes 5-8) land, with each of the four classes based on increasing limitations to long-term sustained production. This classification was devised in 1969 and revised in 1971 and again in 2009 (Appendix 1). Class 1 to 3 land was recognised as having considerable productive potential whereas Class 4 land was marginally arable but of very limited productive potential. They occur in increasing amounts but generally are all relatively limited in extent: Class 1 land covers only 0.7% of the land area; Class 2 4.5%, Class 3 9.2%, totalling only 14.4% of the land area, while Class 4 covers 10.5%, and the non-arable classes (5-8) covers 72.1% with Class 8 land, by definition, without any productive value, contributes 21.8% to this total.
6. Replacement of this Act in 1991 by the essentially 'effects-based' **Resource Management Act**, provided much weaker protection and also lacks clarity as to how highly productive land should be managed. So this proposed policy statement, which would recognise Class 1 to 3 lands as 'highly productive' is, we consider, important and long overdue, to provide benefit for present and particularly future generations of New Zealand citizens.
7. We agree with the Summary Document that a **National Policy Statement for Highly Productive Land**, should provide more security with a clear directive for

local authorities, and therefore would be much more preferable to the possible alternatives of National Environmental Standards (NES) for Highly Productive Land or amendments to the NPS on Urban Development Capacity, 2016.

8. Importantly, compared with the other two options a NPS for Highly Productive Land, while providing a clear direction for local authorities, elevating the importance of highly productive land within the RMA land-use planning and decision-making system, would also allow adequate **flexibility to respond to local conditions** and priorities.
9. The operation of a NPS for Highly Productive Land, as outlined in the Summary Document, clearly describes its **benefits and the reasons** for its preference.
10. The Summary Document also describes the **“wider national direction”** and specifically the Proposed NPS for Urban Development which this proposed NPS on Highly Productive Land, would relate to: this is another valid reason for its preference over the two possible alternatives that have been listed and discussed above (see Item 7).
11. Further on the wider national direction, it is reassuring to see that the Ministries recognise that the problems facing highly productive land are not restricted to protection and will need to be linked to other planning instruments to **ensure sustainable management is achieved overall**.
12. In this context recognition is required that the state of **“highly productive” is not fixed**. All land and soils can be improved or degraded by the management systems employed and should not be seen in isolation. For example, maintaining or increasing the carbon level in soils will enhance cation exchange capacity and soil water infiltration and holding capacity for improved fertility. Concurrently this will have benefits for adapting and mitigating climate change by reducing the severity of drought impacts and sequestration of carbon.
13. Moreover, when considering resource management systems, there is a tendency to focus on **how** we do things rather than consider **what** we do. So planning systems must require all landowners not just to consider adjusting their current enterprise systems, but to actually be prepared to **change the enterprise system itself**, if that is necessary to ensure these soils are still as, or more productive for future generations.
14. There is also a growing recognition that many of the adverse impacts on soils and the wider ecosystems can be addressed by shifting away from our current reliance of chemical fertilizers (particularly nitrogen) to a more **regenerative/ agroecological strategy**. Such more holistic approaches to soil and land management should therefore be the basis of ongoing discussions and embedded in the overall planning process.

Thankyou for the invitation to submit. We should like to have the opportunity to be heard if that is offered.

**Signed.** Alan F. Mark, FRSNZ, KNZM, Chair, Wise Response Society Inc.

## APPENDIX 1. Areas of Land Use Capability Classes 1 -8, in New Zealand.

The total area of each LUC Class in hectares for both the North and South Islands, and their national percentage as mapped in the New Zealand Land Resources Inventory using the latest edition data, are given in Table 27. [Extracted from the Land Use Capability Survey Handbook; 3<sup>rd</sup> Ed. 2009.]

*Table 27: Area in hectares of LUC Classes 1–8, estuaries, lakes, quarries, rivers and towns as mapped in the North and South Islands during the national NZLRI survey, 1975–1999.*

	North Island <sup>2</sup> (x100 ha)	South Island <sup>2</sup> (x100 ha)	NZ Total <sup>2</sup> (x100 ha)	NZ <sup>2</sup> (%)	Total arable and non arable land <sup>2</sup> , (ha) & national %
LUC class 1	1525	345	1870	0.7	Arable land LUC Classes 1–4 6 608 700, 25%
LUC class 2	6958	5062	12020	4.5	
LUC class 3	10645	13778	24423	9.2	
LUC class 4	13004	14769	27773	10.5	
LUC class 5 <sup>1</sup>	935	1167	2109	0.8	Non-arable land LUC Classes 5–8 19 173 300, 72%
LUC class 6	40787	33943	74730	28.1	
LUC class 7	27746	29148	56894	21.4	
LUC class 8	10154	47853	58007	21.8	
Estuaries	220	117	337	0.1	
Lakes	1132	2204	3336	1.3	
Quarries	10	.2	11	0.0	
Rivers	281	2458	2739	1.0	
Towns	1149	316	1465	0.6	
Grand Total	114548	151158	265706		

<sup>1</sup> Class 5 as mapped under the former SCRCC (1974) definition.

<sup>2</sup> Excludes land not mapped as part of the national NZLRI survey such as outlying islands and Stewart Island.

## Appendix 2: Background to the Wise Response Society Inc.

### Purpose of Society

1. **Wise Response** is an Otago-based but New Zealand-wide, non-partisan Society, launched in 2013, with the purpose of persuading the New Zealand Parliament, Government and New Zealand society in general, to confront and respond effectively to any confirmed threats arising from the question: "As demand for growth exceeds earth's physical limits causing unprecedented risks, what knowledge and changes do we need to secure New Zealand's future wellbeing?"
2. Our Chairperson Sir Alan Mark conducted a **nation-wide tour** that year with 11 public meetings from Auckland to Invercargill to explain the Society's purpose and strategy, and gain support. The Society has no formal membership beyond the 15 persons who formed the Society and its current Committee. Its strength lies in the wide range of supporters who participate in online discussions around the "limits" theme; many being experts in their professional fields are able to provide multidisciplinary input into our initiatives. Our Patron is Sir Geoffrey Palmer QC.



3. In April 2014, we presented our 5,000+ signature petition to Parliament, that recommended they undertake a Risk Assessment of New Zealand, in five subjects as follows:
  - i. **Financial security:** the risk of a sudden, deepening, or prolonged global financial crisis.
  - ii. **Energy and climate security:** the risk of continuing our heavy dependence on fossil fuels.
  - iii. **Business continuity:** the risk exposure of all New Zealand business, including farming, to a lower carbon economy.
  - iv. **Ecological/Environmental security:** the risks associated with failing to genuinely protect both land-based and marine ecosystems and their natural processes.
  - v. **Genuine well-being:** the risk of persisting with a subsidised, debt-based economy, preoccupied with maximising consumption and GDP, and increasing inequality.
4. The Appeal sought a commitment to a **cross-party risk assessment** of how and exactly where New Zealand is exposed and vulnerable, as a rational basis for integrated planning for a more secure future. The petition was referred to the Finance and Expenditure Select Committee, with a hearing on July 1, 2015. The majority (National Party) response was negative, claiming Government was adequately addressing the issues of concern, but the three minority parties; Labour, NZ First, and the Greens, offered strong endorsement.

### Typical activities

5. In October 2014, members Sir Alan Mark and Prof Peter Barrett presented a resolution to the **Royal Society Fellows AGM**, which resulted in the Society producing and publishing two commissioned reports in 2016, on the Implications and the Mitigation of Climate Change in New Zealand.
6. Another significant initiative was to hold two meetings in Wellington with about 25 NGOs, to facilitate development of a **Position Statement and Action Plan on climate change**, under the name Climate Consensus Coalition Aotearoa (CCCA). Given the political vacuum at the time, this was to propose a goal and process by which to develop a New Zealand Plan to give effect to the spirit and intent of the Paris Accord of Dec. 2015. The total of individuals and the membership of organisations which formally endorsed the CCCA numbered approximately 330,000 from about 100 organisations.
7. In August, 2017 we made presentations of the CCCA Action Plan to MPs at **Parliament**, through GLOBE-NZ members (arranged and chaired by Dr Kennedy Graham) and an invited audience of all MPs in the Beehive Theatre.
8. Our Society also makes **regular submission** on a range of policy change issues. Examples include the Emissions Trading Scheme, the Resource Legislation Amendment Bill, Regional Policy Statement of the Otago Regional Council (and mediation with Dr Royden Somerville QC and Will Anglin as Counsel which has

since been appealed to the Environment and High Courts), New Zealand Energy Efficiency and Conservation Strategy, the Productivity Commission, the Child Poverty Reduction Bill and the Tax Review Group, and most recently, the Zero Carbon Bill with particular focus on methane.

9. The Society also aims to raise climate change/environmental awareness through **public meetings**. In November 2017 we arranged a seminar on Integrated Landscape Management In Jan. 2018, the Society held "Climate Change issues: from Bonn COP23 and Beyond", with Central and Local Government responses, addressed by the Hon James Shaw, Minister of Climate Change, Mr Dave Cull, President of Local Government New Zealand and Hon Clare Curran, MP for Dunedin South, with some 400 attendees. This has been followed by public meetings on "Tackling our Climate Emergency Head-On: Carbon Accounting" and "Impacts of the Mining/Minerals Industry", timed to coincide with the national Minerals Forum in Dunedin in May 2019.
10. In 2018 we participated in the **National Science Challenge** to report on "Transformation of land-based industries" and in Sept - Oct ran a 6 week course for U3A on the "Finding a Sustainable Transition Path to Zero Net Carbon Emissions for New Zealand".
11. We also host **interns** from the Otago University to undertake projects concerned with sustainability. Further information is available at our website: [www.wiseresponse.org.nz](http://www.wiseresponse.org.nz)