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## **Masterton District Council Submission on the Proposed National Policy Statement for highly productive land.**

Masterton District is comprised of urban, rural and coastal areas. Our district has a strong provincial background that has been shaped by the primary industries that our economy was built on.

Our population is 25,700, an increase of 500 from the 2013 Census, with 73% of the population living in the urban area of Masterton.

Building consents have increased, with 178 new dwellings in the 2018/19 year.

New subdivisions already consented in the district provide for approximately 1,000 allotments within the urban boundary.

Masterton's economy is showing encouraging signs of growth. Our local economy grew by 2.3% in 2018/19, higher than Wellington's increase of 2.1%.

### **Our Vision is: Providing the best of rural provincial living.**

#### **Introduction**

Thank you for the opportunity to submit on the discussion document on a proposed national policy statement for highly productive land.

Masterton District Council understands the value of highly productive land for New Zealand and is supportive of a national approach to protecting this.

We have worked to contain urban development within existing urban boundaries appreciating the social, cultural, economic and environmental value of this land for our community. The Wairarapa Combined District Plan became operative in 2011. At the time of developing this Plan, Masterton District Council provided for future urban development. We have not had to extend our urban boundaries and still have land available for development despite considerable growth in the region's economy.

We have however seen the conversion of land immediately surrounding our urban area from farm land to lifestyle blocks and appreciate the impacts that sub-division of such land can have on productivity, as well as the tensions that can arise through co-existing development and production.

With the increasing population in our region and New Zealand it is, in our opinion, extremely important to protect our highly productive land. A national Policy Statement, as proposed, would support the direction we have taken and assist in guiding future decisions.

In answer to the questions posed by the discussion document we make the following observations from a local perspective:

#### **2.4**

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

Highly productive land has social, cultural, economic and environmental value and is therefore an important factor in supporting the wellbeing for our community. For example, it provides the country with the ability to grow food in the volumes and quality required to feed New Zealand's rapidly growing population. It also provides the country with goods for export, supports employment and has cultural value for tangata whenua.

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

Existing food growing hubs are generally in close proximity to transport and have a servicing network available in their provincial cities and towns. These hubs can be maximised by: 1) ensuring that there is adequate water available, for example water storage should be encouraged, 2) discouraging subdivision of highly productive land and 3) ensuring reverse sensitivity covenants are registered on titles where there is development in close proximity.

#### **3.1**

##### **Q. Does the RMA framework provide sufficient clarity and direction on how highly productive land should be managed?**

The present RMA framework does not provide any clarity or direction on how highly productive land should be managed. The importance of highly productive land should be elevated to section 6 of the RMA which would allow it to be given the necessary weight when considering proposed future development. However, given the timeframes that would be required to implement this, a National Policy Statement for Highly Productive Land is supported. This could provide clear direction on how it should be considered alongside other competing pressures.

##### **Q. Does the RMA framework provide sufficient clarity on how highly productive land should be considered alongside competing uses?**

The RMA framework does not provide sufficient clarity leaving Council to continually weigh up competing needs. An NPS would give a clear signal to Councils that highly productive land is a nationally significant finite resource that requires protection.

##### **Q. How are values and wider benefits of highly productive land being considered in planning and consenting processes.**

In the Masterton District we have been fortunate to have rules in the Wairarapa Combined District Plan that have provided us with some ability to prevent urban expansion beyond our present urban boundaries.

We are about to commence a review of the Plan and will be considering the values and benefits of highly productive land, and whether this is adequately considered, through that process. A National Policy Framework would assist this process.

### **3.2**

**Q. How is highly productive land currently considered when providing urban expansion?**

When preparing the Wairarapa Combined District Plan careful consideration was given to future urban expansion and this was provided for within the present urban boundary. Those areas for future urban expansion still have capacity for further development into the future.

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

Highly productive land should be considered for its contribution to the wellbeing of our community now and in the future, from the ability to grow all manner of primary products and food for the growing population to jobs in rural provincial areas. Proximity to road and rail links and adequate water/storage are also key considerations for supporting highly productive land.

### **3.3**

**Q. How should highly productive land be considered when providing for rural lifestyle development?**

Rural lifestyle development in close proximity to highly productive land should be discouraged. If it is allowed, then strong reverse sensitivity covenants should be registered against new land titles. It is not possible to farm without using a tractor, having stock noise or harvesting crops when they are ready.

### **3.4**

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

Through a mixture of education, plan rules and reverse sensitivity covenants. Green planted buffers can also assist.

**Q. How can reverse sensitivity issues at the rural-urban interface best be managed.**

See 3.3 and 3.4 above.

### **3.5**

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

Yes, there can be tensions between development and the activities required for land to be productive. We believe the issues have been accurately reflected.

**Q. Are you aware of any other problems facing highly productive land?**

Tensions also exist between the drivers for planting trees (e.g. biodiversity values and climate change mitigation) and the need for food production for our increasing population, and future populations.

#### 4.5

**Q. Which option do you think would be the most effective to address the problems identified in Chapter 3?**

Option One (NPS) is the preferred option as it addresses the problems facing highly productive land, whilst providing a degree of flexibility in direction which allows for local considerations. It is also less costly and can be implemented in a timelier manner.

**Q. Are there other pros and cons of a National Policy Statement that should be considered.**

Yes, the NPS should ensure that it is not a one size fits all document. There should be flexibility to allow for local discretion.

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

No.

#### 5.

**Q. Should the focus of the National Policy Statement be on versatile soils or highly productive land more broadly?**

The focus should be on highly productive land, with the default being LUC 1-3.

**Q. Should the focus of the National Policy Statement be on primary production generally or on certain types of food production activities?**

The focus should be on primary production generally as food production trends change over time and “primary production” allows for all types of food and processes.

#### 5.3

**Q. Do you support the scope of the proposal to focus on land use planning issues affecting highly productive land?**

We generally support the scope of the proposal however we believe that lots of 4 hectares should **not** be excluded from highly productive land. The reason for this is that there are crops that can be productive on 4 hectares and in some provincial areas there is a move to buy back and amalgamate this land to form productive primary production land.

**Q. Should future urban zones and future urban areas be excluded from the scope of the National Policy Statement?**

We agree that areas included in district plans for future urban development should be excluded from the scope and that future urban areas in non-statutory documents should be included in the scope.

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

The NPS should apply nationally.

#### 5.4

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

Better recognition of the value of highly productive land and rules that provide for its protection from urban sprawl and intensification. This would mean land would be available for food production for future generations.

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

**Q. Should the objectives provide more or less guidance on what is “appropriate subdivision, use and development”?**

The proposed wording for the Objectives set out in Table 2 in our opinion have the guidance and level of direction required.

#### **Policies**

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

Regional Council's and District Council's should collaborate to identify highly productive land. This may mean that the identification could happen sooner.

**Q. Are the proposed criteria all relevant and important considerations for identifying highly productive land?**

Yes, noting that climate change may mean different types of production and/or require different types of irrigation to be explored, for example using treated wastewater.

**Q. What are the pros and cons associated with prioritizing highly productive land for primary production?**

The potential and future contribution of highly productive land for the community will be considered. It will also allow for the planning of transport hubs, service centres and water storage.

**Q. Do you think there are potential areas of tension or confusion between this proposed NPS and other national direction? And**

**Q. How can the proposed NPS for highly productive land and the proposed NPS on urban development best work alongside each other to achieve housing objectives and better management of the highly productive land resource?**

There is the possibility of tension but there is the opportunity to lessen this through regions working together to identify areas where urban expansion can occur and where 'no go areas' of highly productive land exist for primary production.

**Q. How should highly productive land be considered when identifying areas of urban expansion?**

Consideration will have to be given to the shortage of land for urban development, or whether there are better ways of using urban zoned land to provide the capacity required.

The long-term benefits of protecting highly productive land and the benefits to the community (e.g. the produce and employment for the community) also need to be considered.

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

Proposed Policy 4 sets out a range of acceptable management tools.

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

Proposed Policy 5 sets out a range of acceptable management tools.

**Q. How should the National Policy Statement guide decision making on private plan changes to rezone highly productive land for urban or rural lifestyle use? and How should the National Policy Statement guide decision making on resource consent applications for rural lifestyle subdivision and urban expansion on highly productive land?**

Proposed Policies 6 and 7 set out acceptable matters for consideration for the above questions.

**Q. Do any of the draft definitions in the National Policy Statement need further clarification?**

The definitions are easily understood and fit for purpose. The minimum threshold for highly productive land is supported. Four hectares can be used economically to produce a number of primary products.

**Q. Do you think planning standards are needed to support the consistent implementation of some proposals in this document.**

No, we do not believe a planning standard is required. We would prefer flexibility for local conditions.

## **5.7 Timeframes**

The timeframes proposed seem workable.

Ngā mihi,



**Kathryn Ross  
Chief Executive**

16 October 2019