

Submission

Proposed NPS for Highly Productive Land

PREPARED BY: Ashburton District Council SUBMITTED TO: Ministry for Primary Industries
PO Box 94 NPS - HPL
ASHBURTON 7774 PO Box 2526
 WELLINGTON 6140

Jane Donaldson; Group Manager Environmental Services

soils@mpi.govt.nz
www.mpi.govt.nz/highlyproductiveland

Introduction

1. Ashburton District Council ('Council') welcomes the opportunity to submit on the Proposed NPS for Highly Productive Land - Discussion Document. This submission is being made on behalf of the Council, who approved the submission on 26 September 2019 at its Council meeting.
2. Located between the Rakaia and Rangitata Rivers respectively, and an hour's drive south of Christchurch, more than 33,400¹ residents live in the district, with the main town of Ashburton accounting for over 55% of residents. The rest of our residents live rurally or in smaller towns or villages.
3. Ashburton district has experienced a moderate and sustained population increase since 1996, with a population growth of over 33%². The expansion of irrigation and agricultural diversification on the Canterbury Plains have been major factors in this growth.

Land use in Ashburton District

4. Council is aware that the Ashburton District has a significant amount of Highly Productive Land (HPL) and that this is of great importance to both the district economy and the wider national economy.
5. Council has been mindful of the issue of urban growth onto productive land for a number of years, with the second generation Ashburton District Plan (operative since 2014) restricting expansion of non-rural activities into rural zones. We plan to commence the third generation review of the District Plan in 2020.
6. Council notes as shown on page 67 of the discussion document that in our district most of our towns and settlements are surrounded by versatile soils. As in many other parts of the country, the expansion of existing settlements where there is existing infrastructure is the only logical and cost effective option. Areas of less productive land in Ashburton district tend to be remote and impractical for future development.

¹ Source: Statistics New Zealand Census 2018
Source: Statistics New Zealand Population Estimates 30 June 2018

² Source: Statistics New Zealand Census 2013

General Comments

7. Council supports the preferred option of developing a national policy statement, as opposed to national environmental standards or amendments to the NPS on Urban Development Capacity. We believe this is the most effective mechanism.
8. Council agrees that the emphasis of the NPS – HPL should be on land rather than soil.
9. Council does have some concerns that the consideration of factors under Policy 1 (Identification of HPL) may not provide as much strength as actual criteria. We consider that the proposed NPS as currently drafted may not give Councils the ‘teeth’ that is intended. However, it does provide flexibility which may be important for future proofing. Other changes arising from freshwater management, for example, could result in new uses for HPL that are not currently apparent. This could include small lots that are highly productive and/or other uses that do not necessarily fit within these considerations.
10. While regional councils have responsibility for identifying HPL, we would expect it to be made clear that this process is to be carried out collaboratively as district councils will have a good understanding of local issues such as transport routes and the labour market, as well as overall spatial planning for their respective districts.
11. Council supports the overall intent of the three objectives and seven policies as identified in the NPS.
12. Council agrees that the NPS should not impact on existing urban areas and land identified as future urban zones in District Plans.
13. Council does have some concern about the achievability of the proposed three year target for regional councils to spatially identify HPL.
14. Council does wish to signal the difficulties facing councils having to balance urban growth with HPL. While this is not a direct issue for the Ashburton District, we note that for our neighbour, Selwyn District, this will be a challenge.
15. With regard to incentives and restrictions in Proposed Policy 4 (Rural subdivision and fragmentation), more detail is required as to how councils can introduce mechanisms into their plans to retain and increase the productive capacity of HPL.
16. Council notes that the Ashburton District has been used as a case study in the discussion document. We would welcome the opportunity to discuss these results with officials in greater detail.

Council thanks the Ministry for Primary Industries and the Ministry for the Environment for the opportunity to submit on the *NPS Highly Productive Land Discussion Document*.



HAMISH RIACH
Chief Executive



DONNA FAVEL
Mayor