



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

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[REDACTED]

Are you submitting on behalf of an organisation? Yes – another party [] No []

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

Andrew Carr and Sarah Panett, owners of a 4.085 ha rural lifestyle block at [REDACTED]. The land is adjoining (opposite) an existing rural residential zone and just 1 ½ km from Rangiora township, north of Christchurch. It is within a preferred rural residential area in the recently adopted Waimakariri Rural Residential Strategy, as shown on the plan below:-

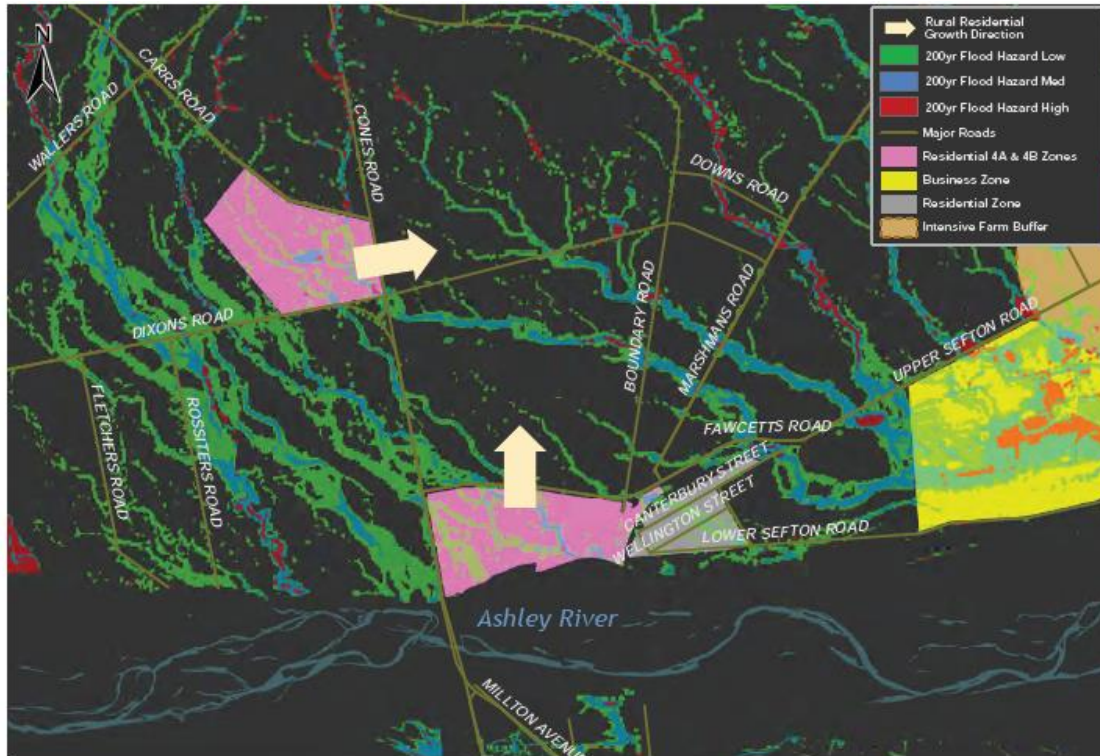


Figure 8: Ashley / Loburn rural residential growth directions

Submissions are public information

All or part of any written submission (including names of submitters) may be published on the Ministry for Primary Industries' website, or the Ministry for the Environment's website. Unless you clearly specify otherwise in your submission, the ministries will consider that you have agreed to have your submission and your name posted on their websites.

Contents of submissions may be released to the public under the Official Information Act 1982, if requested. Tell us if you do not want some or all of your submission released, stating which part(s) you consider should be withheld and the reason(s) for withholding the information.

Under the Privacy Act 1993, people have access to information held by agencies about them. Any personal information you send with your submission will only be used in relation



to matters covered by this document. In your submission, indicate if you prefer that we do not include your name in the published summary of submissions.

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.

Rather than comment in detail on all questions, we have set out our submission below.

Additional comments

Our Submission

Our particular interest is with the implications of the NPS-HPL for existing and proposed rural lifestyle areas (including our land at Loburn as identified in this submission).

We note proposed Policy 4: Rural subdivision and fragmentation includes

c. directing new rural lifestyle development away from areas of highly productive land

HPL is to include all Class 1-3 land until regional councils define HPL in their regional plans (by 2023). Appendix A includes criteria to identify HPL.

We strongly oppose the 'interim' position of including all Class 1-3 land as HPL from the date of gazettal of the NPS-HPL until regional councils define HPL in their regional plans.

This does not recognise that much Class 1-3 land (particularly in the Greater Christchurch context) is already on land which is too small for any economic productive use (the minimum lot size for subdivision and a dwelling in the rural zones surrounding Greater Christchurch urban areas is for the most part 4 ha, but economic production generally requires lot sizes of 20 ha +). We consider there is no need for what is in effect an 'interim rule' as Objective 3 already gives a clear direction that subdivision and land fragmentation which comprises the use of HPL for primary production is to be avoided.

The Appendix A: criteria to identify HPL should be amended as follows (additions in bold and underlined)

HPL means:...

- c. Does not include urban **and rural lifestyle development** areas; or areas that have been identified as future urban or **rural lifestyle** zones in district plans, **or identified***



as future urban or rural lifestyle areas in adopted non statutory plans which have been prepared under the Local Government Act

5.5 Interpretation should be amended as follows:

Highly production land means:...

- c. *does not include urban **and rural lifestyle areas** or areas that have identified as a future urban or **rural lifestyle zone** or **as future urban or rural lifestyle areas in adopted non statutory plans which have been prepared under the Local Government Act***

Future urban and rural lifestyle areas have already gone through a planning merits and public consultation process, have been proven as 'suitable' for rural lifestyle development and investment decisions have been made reliant on these documents.

The primary purpose of rural lifestyle development areas (as defined in the NPS-HPL) is rural residential or rural lifestyle use not rural production. This is not HPL.

We support the NPS-HPL definition of rural lifestyle development, including land typically in the 0.2 – 8 ha size range.