



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.

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Are you submitting on behalf of an organisation? Yes [x] No []

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

New Zealand Pork Industry Board

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.

Section 2.3: Defining highly productive land [page 19]

What are the values and benefits associated with highly productive land?

What are the values and benefits associated with existing food growing hubs and how can these be maximised?



Section 3.1: Problem statement [page 23]

Does the RMA framework provide sufficient clarity and direction on how highly productive land should be managed? Why/why not?

Does the RMA framework provide sufficient clarity on how highly productive land should be considered alongside competing uses? Why/why not?

How are values and wider benefits of highly productive land being considered in planning and consenting processes?

Section 3.2: Urban expansion on to highly productive land [page 24]

How is highly productive land currently considered when providing urban expansion? Can you provide examples?

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



Section 3.3: Fragmentation of highly productive land [page 25]

How is highly productive land currently considered when providing for rural-lifestyle development? Can you provide examples?

How should highly productive land be considered when providing for rural-lifestyle development?

Section 3.4: Reverse sensitivity [page 26]

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

How can reverse sensitivity issues at the rural-urban interface best be managed?



Section 3.5: These issues are being seen throughout New Zealand [page 26]

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

Are you aware of other problems facing highly productive land?

Section 4.5 Preferred option – a National Policy Statement [page 31]

Which option do you think would be the most effective to address the problems identified in Chapter Three? Why?

Are there other pros and cons of a National Policy Statement that should be considered?

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



Section 5.2 Purpose of the proposed National Policy Statement [page 34]

Should the focus of the National Policy Statement be on versatile soils or highly productive land more broadly? Why/why not?

Should the focus of the National Policy Statement be on primary production generally or on certain types of food production activities? Why/why not?

Section 5.3 The scope of the proposal [page 35]

Do you support the scope of the proposal to focus on land use planning issues affecting highly productive land? Why/why not?

What matters, if any, should be added to or excluded from the scope of the National Policy Statement? Why?

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?



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

Section 5.4 The proposed National Policy Statement [page 37]

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

Policy 1: Identification of highly productive land [page 41]

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

NZPork agrees that defining highly productive land should not be solely based on the Land Use Capability (LUC) system. As outlined in the discussion document, in addition to the limitations of the LUC class system, other factors may contribute to whether land may be considered as highly productive.

Pig farmers are able to very efficiently utilise smaller land parcels for intensive food production, and while they are not generally reliant on the productive capacity of the land in which they operate (as most food is imported onto the farm) they are reliant on other factors such as access to transport routes, labour markets, rural processing facilities and infrastructure. As such, the NPS should recognise that highly productive land can contain a range of rural activities and facilities that are not necessarily associated with the productive capacity of the soil.

Are the proposed criteria all relevant and important considerations for identifying highly productive land? Why/why not?



NZPork supports Proposed Policy 1 for the identification of highly productive land and the criteria in Appendix A for identifying highly productive land beyond LUC class.

Policy 2: Maintaining highly productive land for primary production [page 42]

What are the pros and cons associated with prioritising highly productive land for primary production?

NZPork supports Proposed Policy 2 for maintaining highly productive land for primary production, on the basis that this does not preclude intensive indoor primary production. Legitimate rural production activities should not be constrained anywhere within a rural zone. In addition, pig farms often form an integrated part of a larger farming enterprise, such as a dairy or arable operation.

Both indoor and outdoor pig farming are often historically and likely with growth to locate on easy grade flat rural land. Invariably this will sometimes fall to be classified as Class I, II or III. Therefore, while the productive capability of the soils itself may not be necessary for pork producers, access to the land itself and other associated resources (i.e. access to freshwater) is critical to maintain pork production in New Zealand. A policy that excluded the use of rural land for a broad range of rural production activities would not be supported by NZ Pork.

Alignment with the Urban Growth Agenda [page 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)?



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?

Policy 3: New urban development on highly productive land [page 45]

How should highly productive land be considered when identifying areas for urban expansion?

Policy 4: Rural subdivision and fragmentation [page 46]

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

Fragmentation of rural land can be detrimental to the continued operation or growth of existing pig farms, by reducing the availability of suitable land or imposing setbacks to newer sensitive activities that restrict expansion or redevelopment.

NZPork supports Proposed Policy 4 for ensuring councils take a proactive approach in managing rural subdivision and fragmentation to maintain the productive capacity of highly productive land, noting that the productive capacity of the land isn't solely the availability of the land, but the ability to successfully operate production activities on that land without giving rise to reverse sensitivity effects.

As identified in the discussion document, issues arising from the fragmentation of rural land and reverse sensitivity are not unique to highly productive land. While commercial pig farming isn't directly reliant on the productive capacity of the land on which it is situated, it is still reliant on the land resource and robust district planning provisions for rural zones which provide for many of the issues identified in this proposed NPS.



While NZPork is broadly supportive of the proposed NPS, we would not want to see planning provisions for rural zones outside of those defined as highly productive to be neglected. A lack of direction for the broader rural zone could result in long-established farmers being at increased risk of fragmentation and reverse sensitivity issues if not sited on land defined as highly productive.

NZPork would be supportive of an NPS which addresses these issues and provides direction to local authorities more broadly across rural production zones.



Policy 5: Reverse sensitivity [page 47]

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

Reverse sensitivity from new residential or lifestyle developments is one of the biggest challenges facing commercial pig farmers. Pig farmers have a long history of environmental innovation and have addressed these challenges by developing increasingly sophisticated systems for managing environmental effects, such as covering effluent ponds and using direct injection techniques for effluent spreading to minimise odour.

However, even when well-managed, intensive farming practices cannot completely internalize all the sights, sounds or smells associated with their production activities. This is not always inherently a problem, indeed rural character and amenity is often defined by the rural production activities it supports. Within rural zones, intensive farming activities and their associated effects should generally be expected to occur and therefore there should be an element of tolerance for effects beyond the property boundary. However, this is not always the case, and complaints from new sensitive activities about intensive farming practices can put pressure on rural producers to constrain legitimate activities, can erode the rights of farmers over time, and can undermine the productive capability and earnings potential of rural land.

NZPork supports Proposed Policy 5 to direct territorial authorities to identify the activities and effects associated with primary production activities that should be anticipated and tolerated in rural areas, to ensure any new developments on highly productive land do not compromise the operation of primary production activities and to establish methods to avoid or mitigate reverse sensitivity effects. Activities sensitive to the effects of rural production should not occur in rural zones and the rural character and amenity expectations must reflect the working nature of this environment.

Policies 6 and 7: Consideration of private plan changes and resource consent applications on highly productive land [page 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?



How should the National Policy Statement guide decision-making on resource consent applications for subdivision and urban expansion on highly productive land?

Section 5.6 Implementation [page 52]

What guidance would be useful to support the implementation of the National Policy Statement?



Specific / technical questions

The questions below are included in the outline of the proposed NPS-HPL (Chapter Five of the discussion document) and may assist technical experts when providing a submission.

Specific questions

Section 5.3: The scope of the proposal [page 35]

How should the National Policy Statement best influence plan preparation and decision-making on resource consents and private plan changes?

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?

What areas of land, if any, should be excluded from the scope of the proposed National Policy Statement? Why?

Specific questions

Section 5.4: The proposed National Policy Statement [page 37]

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



Should the objectives provide more or less guidance on what is “inappropriate subdivision, use and development” on highly productive land? Why/why not?

Specific questions

Policy 1: Identification of highly productive land [page 41]

What are the pros and cons of requiring highly productive land to be spatially identified?

Is the identification of highly productive land best done at the regional or district level? Why?

What are the likely costs and effort involved in identifying highly productive land in your region?

What guidance and technical assistance do you think will be beneficial to help councils identify highly productive land?



Specific questions

Appendix A: Criteria to identify highly productive land [page 41]

Should there be a default definition of highly productive land based on the LUC until councils identify this? Why/why not?

What are the key considerations to consider when identifying highly productive land? What factors should be mandatory or optional to consider?

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?

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?



Specific questions

Policy 3: New urban development on highly productive land [page 45]

How can this policy best encourage proactive and transparent consideration of highly productive land when identifying areas for new urban development and growth?

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?

Specific questions

Policy 4: Rural subdivision and fragmentation [page 46]

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?

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?

Specific questions



Policy 5: Reverse sensitivity [page 47]

How can the National Policy Statement best manage reverse sensitivity effects within and adjacent to highly productive land?

Specific questions

Policy 6 and Policy 7: Consideration of private plan changes and resource consent applications on highly productive land [page 49]

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?

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?

Should the policies extend beyond rural lifestyle subdivision and urban development to large scale rural industries operations on highly productive land? Why/why not?



Specific questions

Section 5.5: Interpretation

Do any of the draft definitions in the National Policy Statement need further clarification? If so, how?

Are there other key terms in the National Policy Statement that should be defined and, if so, how?

Should there be minimum threshold for highly productive land (i.e. as a percentage of site or minimum hectares)? Why/why not?

Specific questions

Section 5.6: Implementation [page 52]

Do you think a planning standard is needed to support the consistent implementation of some proposals in this document?

If yes, what specific provisions do you consider are effectively delivered via a planning standard tool?



Specific questions

Section 5.7: Timeframes [page 52]

What is the most appropriate and workable approach for highly productive land to be identified by council? Should this be sequenced as proposed?

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?



Please use the space below to provide any additional comments you may have.

NZPork would like to thank the Ministry for Primary Industries for the opportunity to comment on the proposed National Policy Statement for Highly Productive Land. Commercial pig farming is something of a niche industry within New Zealand and is not well understood and often overlooked in regional and district planning provisions. In the development and implementation of this proposed NPS, NZPork would like to see clear and unambiguous direction given to local authorities to allow for consistent and fair implementation for pig farmers across the country.

We would welcome the opportunity to discuss our submission further.

1. About NZPork

The New Zealand Pork Industry Board (NZPork) is a statutory board funded by producer levies. The board's statutory function is to act in the interests of pig farmers to help attain the best possible net on-going returns while farming sustainably into the future.

2. Commercial Pig Farming in New Zealand

The commercial pig farming industry in New Zealand is small by international standards, with around 90 registered commercial pork producers nationally. These producers have an important flow-on effect to their communities, forming an integral part of the rural economy as they utilise other farming resources such as grains for feed production as well as providing employment. In 2016, the value of pig production in NZ was around \$420 million at retail.

In New Zealand, most pigs are farmed in traditional indoor farming systems, but around 40% are farmed outdoors in free farmed or free-range systems. Outdoor production relies on flat land, low rainfall and free draining soils. Because of this, most outdoor farms are situated in Canterbury.

In both indoor and outdoor production systems, pig farmers are generally not directly reliant on the productive capacity of the land, as most pig feed is imported onto the farm. Pigs are monogastric animals and require concentrated highly specialised diets for optimal nutrition and growth. In both indoor and outdoor systems, commercial pig farmers can



effectively utilise smaller land parcels for intensive food production, but this requires a high capital investment in stock, buildings and equipment.

New Zealand pig farmers are facing several economic, social and environmental challenges in order to remain viable. The contribution of imported pork to New Zealand's total pork consumption has increased significantly in recent years (now more than 60%), placing further demands on producers who have responded by developing increasingly efficient systems. However, profit margins for the industry remain tight and conversations with farmers have indicated that urban encroachment into productive rural environments and the ensuing reverse sensitivity issues are key concerns.

3. Summary of submission

Urban expansion, lifestyle blocks and the continued fragmentation of rural land are placing pressure on the viability of commercial pig farms across New Zealand. NZPork is broadly supportive of the proposed NPS to give local authorities consistent direction on these issues in their planning frameworks.

In particular, NZPork:

- Supports Proposed Policy 1 to give councils and their communities the flexibility to consider additional criteria when identifying highly productive land.
- Supports Proposed Policy 2 for maintaining highly productive land for primary production, on the basis that this does not preclude intensive indoor primary production.
- Supports Proposed Policy 4 for ensuring councils take a proactive approach in managing rural subdivision and fragmentation.
- Supports Proposed Policy 5 to direct territorial authorities to recognise the potential for sensitive and incompatible activities within and adjacent to areas of highly productive land.
- Would support an NPS which recognises that those issues identified as affecting highly productive land, such as fragmentation, loss of rural land for rural production, and reverse sensitivity issues, also affect the rural sector more broadly.

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