



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?

Acton Farmers Irrigation Co-Operative



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.

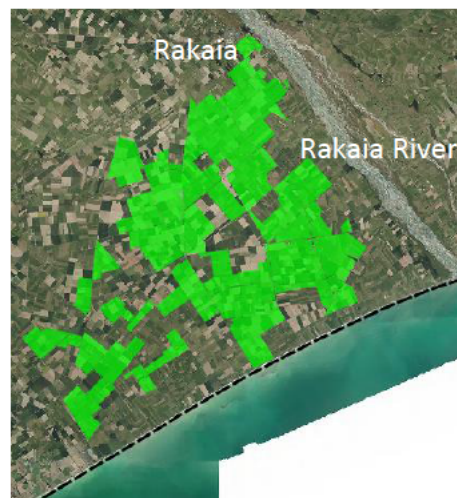
Under the Privacy Act 1993, people have access to information held by agencies about them. Any personal information you send with your submission will only be used in relation to matters covered by this document. In your submission, indicate if you prefer that we do not include your name in the published summary of submissions.



Who Are We?

Acton Farmers Irrigation Co-Operative (AFIC) are a small irrigation scheme located east of Rakaia in Mid-Canterbury (Figure 1). The soils in our scheme are land use capability 2 or 3 and used predominantly for arable, small seed and vegetable operations as well as some dairy and dairy support.

Figure 1: Acton Farmers Irrigation Co-operative Command Area



Our growers are significant producers of potatoes, onions, carrots, beetroot, peas and other vegetables for both the domestic and export market. The deep, fertile soils, reliable irrigation water and temperate climate promote ideal growing conditions not found in many places in New Zealand and the ability to cost-effectively move or expand these operations beyond this part of the district is quite limited.

For these reasons, AFIC strongly support the intent of NPS for Highly Productive Soils to protect the productive capacity of this land, however are concerned about how this policy integrates with other national policy documents currently being prepared.



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?

Highly productive land (HPL) is a finite resource which is not only productive, but also the most versatile. As a country, New Zealand needs to ensure this land is available to its fullest capacity to optimise opportunities in response to climate change, market demands and growing populations.

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

In the Mid-Canterbury area, vegetable growers generally supply local processing factories or package vegetables for export themselves. These factories and packaging facilities employ hundreds of locals within the Ashburton district, as well as require professional services from other companies in the area.

Furthermore, the high quality soils mean other land uses, such as dairy and dairy support, are more efficient and have lower environmental impacts. We find our dairy farms require less water and fertiliser inputs to produce the same amount of milk, resulting in lower nitrate leaching and greenhouse gas emissions from these activities.

The locality of these facilities often due to proximity to growers, availability of water, and access to infrastructure such as main highways and rail networks. Ensuring these facilities can continue to access produce from existing food growing hubs can optimise the efficiency of transport, reducing GHG footprint of the final product.

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

Are you aware of other problems facing highly productive land?

The major issue we see facing Highly Productive Land in Mid-Canterbury is the restrictions on land use implemented from other rule frameworks, such as nutrient management. Protecting land for use by primary industries is not required where nutrient management limitations prevent further growth in these areas anyway. Where land has been set aside specifically to enable resilience to changing agricultural environments and population growth, then other planning frameworks need to enable, not restrict, flexibility in land use.



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?

We prefer these provisions are included as a it's own NPS or a NES, not through the NPS for Urban Development Capacity as the issues relating to Highly Productive Land extend beyond inappropriate subdivision.

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?

This NPS should be about protecting versatile soils, as there are a number of factors which contribute to the ability of the land to respond to changes, not just the land use capability, such as reliability of rainfall or irrigation, impacts on waterways, and proximity to markets, factories or transport networks.

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

Our preference is for the NPS to consider primary production as a whole, as the full diversity of land use options are needed to optimise the use of this particular land for food production. There are also implementation issues as many land uses are integrated, creating challenges if applying one set of rules for one sector and a different set of rules for another (e.g. dairy support vs arable – we have a number of shareholders who do both on rotation through their property).

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?

Regional Councils should spatially identify HPL.

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

We support the criteria of highly productive land to have consideration of Land Use Capability 1, 2 or 3, as well as the other matters listed on page 39 of the discussion document.

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?

Where Highly Productive Land is used for supplying the domestic market, maximising the use of this land ensures sustainable supply of fresh food to New Zealanders at an affordable price.



Furthermore, restricting low density housing development on the outskirts of a city creates an incentive to infill medium density land closer to the urban centres, minimising sprawl and optimising existing infrastructure networks, such as public transport.

The main disadvantage is the removal of complete flexibility of land use and potential significant reduction in land values, where the land can currently be subdivided for housing. We recognise the flip side of this disadvantage is that productive land would be more affordable for those entering the market.

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?

The National significance of HPL should be considered as part of any urban plan change or subdivision.

The greatest loss of rural land occurs when rural land is fragmented into lifestyle blocks. Once subdivided it is difficult to provide for denser urban development into the future due to the land being held in multiple ownership structures and no single party benefiting sufficiently from the development to warrant the investment in infrastructure to service the wider development area.

Flexibility should be provided to councils to make decisions on whether a rural subdivision on designated, highly productive land are suitable in a particular context. For instance, some councils have limited rural subdivisions to a minimum of 20 ha, which removes 20 ha of productive land for each single rural lifestyle property. Whereas it may be more appropriate to allow for the same number (or even more) of subdivisions, but with smaller lot sizes (e.g. 1-4 ha). This may limit the loss of productive land while still allowing some growth of housing in these areas.

Alternatively, some farms designated as “highly productive land” may have specific zones within the property which are not productive. For instance, a topographical feature which renders a smaller block within a farm less unusable for production, such as a steep slope or swamp, but could be used for housing. Property owners should be able to easily subdivide this land, whatever size the unproductive area may be, if they can demonstrate it does not meet the definition of HPL.



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

AFIC fully support the intent of this proposed NPS as it recognises the national importance of the benefits our primary industries bring to New Zealand from our most productive land. By protecting this land, we are safeguarding our ability to provide affordable, quality fresh food for ourselves for the future, as well as enable growth to service international markets. Maximising the productive use of our most versatile land is also essential for building resilience as a nation as we face challenges related to nutrient management, climate change and changing markets.

Our only concern is the lack of recognition of the unique, nation-wide benefits of our highly productive land in other national policy statements in development at the moment.

Due to the national benefits of the use of Highly Productive Land for primary production, we recommend their protection is included as a matter of national significance under Section 6 of the RMA e.g. Section 6 of the RMA to be amended as follows:

b) the protection of the protection of outstanding natural features, soils and landscapes from inappropriate subdivision, use, and development

or

7) other matter

(k) the protection of HLP from inappropriate subdivision, use, and development