

10th October 2019
Ministry for Primary Industries
PO Box 2526
Wellington 6140
New Zealand.
Attention: NPS-HPL Submission, Land and Water Policy Team

Dear Sir / Madam

Farmers for Positive Change (F4PC) submission on the proposed National Policy Statement on Highly Productive Land (NPS HPL)

Thank you for the opportunity to submit on the NPS Highly Productive Land.

F4PC is an advocacy group of farmers, with farmer membership primarily based in the Upper North Island but not limited to give voice to issues of concern.

New Zealand's environmental, social and cultural, and economic well-being remains highly dependent on the opportunities its land supports for primary production and this is further strengthened by the provision of ecosystem services.

F4PC recognise that the overall purpose of the proposed NPS Highly Productive Land is to improve the way highly productive land is valued. The qualifying parcels of land for this will be land which is presently classified Land Use Capability (LUC) classes 1, 2 and 3.

- Recognise the full range of values and benefits associated with its use for primary production.
- Maintain its availability for primary production for future generations.
- Protect it from inappropriate subdivision, use and development.

The NPS HPL is noted for not intending to provide complete protection for highly productive land. This will allow regional councils and communities to have some flexibility to determine what 'highly productive land' is and what is considered as inappropriate land use.

There is admirable intent to manage and optimise better New Zealand's Highly Productive Land and Elite soils as this will provide impetus and direction to support improving existing land uses, developing new high value-add use, incentivise other land-based activities and foster greater regional and local economic development. Without limiting opportunity primary agriculture usage of elite soils considering variance in climate and soils includes traditional arable, pastoral agriculture, forestry and horticulture and more recently viticulture.

These options are lost, often for perpetuity, if land use change away from primary agricultural / primary occurs towards urbanization and this also presents another series of conflicts particularly fragmentation of land use, reverse sensitivities where land use is no longer complimentary or synergistic which can promulgate community divineness.

It is nowadays evident in many spheres that central government direction is required and necessary to establish standardised bottom lines to create an understanding of known certainty and purpose. Consequently, F4PC is supportive of the development of the complementary National Policy Statements - the NPS Highly Productive Land, the National Policy Statement for Urban Development and the National Policy Statement Freshwater. It is hoped that more comprehensive national frameworks about resource use and management will ensure the human footprint across our landscapes is more measured and holistic and can be managed well for all current and future stakeholders.

Decisions sought from this submission

F4PC understand that future planning framework particularly for greenfield development would now be obliged to consider and account for effects on highly productive land. This is a more holistic understanding particularly the provision of ecosystem services in the widest context so including supply chain administration noting the requirement for accessibility of the land to transport, labour, water supply, waste disposal etcetera. Highly Productive Land and Elite Soils also recognises again in a wide context planning assessment whether it be local, regional and national; whereby there is protection of enough land for food growing capacity for today, and importantly for future generations.

Decision sought – that there is a national direction with good precision and clarity that is implicit towards retaining enough land having Highly Productive Land and Elite Soils protected from urban sprawl to avoid unnecessary importation of food supply; this would be most applicable in New Zealand’s more densely populated regions. This is also important to avoid conflicted and inconsistent decision making that may occur amongst communities at a local regional level.

The identification of Highly Productive Land and Elite Soils is considered to be by F4PC problematic as the mapping information resource available to do this undertaking is known to be scarce, of poor resolution and / or unreliable which will not be rectified in the allocated time year-2022. Any foreseeable procedural challenge to the intent of this NPS HPL needs to be countermanded before it arises because this will only incur unnecessary cost and disruption. There must also be cognisant insight about likely impacts from but not limited to climate change, disrupted water supply, water allocation (takes and / or discharge), nutrient allocation and contaminant loss constraints.

Decision sought – Any mapping, design of mapping GIS portals and similar to managed progressively in a staged approach to incorporate new mapping techniques, that all information is verified as being accurate and complete and this be regularly updated with scheduled reviews. The NPS HPL must be adaptable and accommodating to new science and use of new technology in a timely manner.

F4PC have deep-seated concern that we are not always focused upon good optimised outcomes nor are we visionary in looking forward into the future. For example, will food production always be land based as we have undertaken for the past millennia or is new technology becoming evident and available that will circumvent this requirement for example 'vertical farming' thereby allowing other higher value land use opportunity to be realised.

Decision sought – The planning framework cannot be constrained to a narrow pathway of expected and predestinated locked-in outcomes. The planning framework must be open-minded to allow and encourage challenge to conventional processes and wisdom.

F4PC are particularly concerned that there is an inherent mindset in planning authority at all levels of governance where there is an endeavour to pick a land use winner that becomes locked in and protected with peripheral processes developed to support this. This is becoming evident in numerous ways particularly evident by 'grandparenting' contaminant loss rates, severe restrictions placed upon other land classes and land use to provide offset without balance, without fairness and little regard to equitable outcomes.

Decision sought – The planning framework must itself be neutral in all respect towards analysing land use opportunity and expected usage of land whilst ensuring the intent of the NPS HPL is followed. There can be no favouritism or pathway that endeavours to maintain or encourage any type of land use by provision of contaminant loss offsetting mechanisms which could incur cost or loss of opportunity and liberty inflicted upon other independent third-party landowners and land users.

Thank you
Kind regards

Rick Burke (F4PC Chairperson) and Graeme Gleeson

This submission prepared by
Graeme Gleeson

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