

10 October 2019

National Policy Statement on Highly Productive Land  
Ministry for the Environment  
PO Box 10362  
Wellington 6143

Dear Madam/Sir

**Manawatū District Council Submission on the Proposed National Policy Statement on Highly Productive Land**

The Manawatū District Council (Council) thanks the Ministry for the opportunity to provide feedback on the Proposed National Policy Statement on Highly Productive Land (NPS-HPL).

The discussion document on the proposed NPS-HPL included a list of discussion questions. Answers to these questions are attached in table form as Appendix 1. This table forms the body of our submission.

As outlined in Appendix 1, the Manawatū District Council is generally supportive of the need for the NPS-HPL and elevating the importance of highly productive land within the current planning framework.

The Manawatū District Council also supports the submission from Local Government New Zealand (LGNZ).

**Manawatū context**

The agriculture sector is incredibly important to the Manawatu-Whanganui regional economy.

In 2018 the agriculture, forestry and fishing sector directly contributed \$1.02b and 11,970 jobs to the Manawatu-Whanganui economy. This is 11.3% of total Gross Domestic Product (GDP) and 10.5% of all jobs. Sheep, beef, cattle and grain farming and Dairy Cattle Farming are the largest agri-sectors, collectively contributing \$689.3m and 7,359 jobs to the region.

Our District has an above average representation of class 1-3 land. A report commissioned by Landcare Research in 2016 to inform the review of the Manawatū District Council's Rural Zone found that 5% of land within the District is LUC Class 1, 13% is LUC Class 2 and 22% is LUC Class 3 land. Setting national direction around highly productive land is therefore a significant matter for the Manawatū.

**Main Submission Points**

The Manawatū District Council generally supports the proposal for Regional Councils to identify and map highly productive land. An alternative approach suggested in our feedback in Appendix 1 would be to engage a Crown Research Institute to do the initial mapping of LUC Class 1 to 3 land.

The Manawatū District Council is concerned that the NPS-HPL does not explicitly state the priority that should be given to highly productive land. The Manawatū District Council recommends that either the protection of highly productive land from inappropriate subdivision, use and development be added as a matter of national importance under section 6 of the Resource Management Act 1991, or this NPS and the NPS-Urban Development be

amended to be clear about which objectives take precedence – urban growth or protecting highly productive land.

The NPS-HPL will mean that Council will give more weight to the protection of highly productive land when planning for future rural lifestyle zones and urban precincts within the District. Local authorities would benefit from greater guidance around what is meant by “inappropriate subdivision, use and development” when implementing this NPS and balancing the protection of highly productive land against other competing interests.

In summary, the Manawatū District Council supports the intent of the NPS-HPL. Some further improvements to this NPS, as suggested in our submission, will further assist local authorities in giving adequate consideration to the benefits of retaining highly productive land when balancing competing interests.

Please feel free to contact me if you have any questions regarding our submission.

Yours sincerely

A handwritten signature in blue ink, reading "R. Templer". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Dr Richard Templer  
**Chief Executive**

Enc Appendix 1 - MDC Feedback on the Draft NPS on Highly Productive Land.