



# 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](mailto: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](http://www.mpi.govt.nz/HighlyProductiveLand).

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

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

### 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?

Soils with a high capability to produce valuable nutrition. These soils would have a high level of soil life and high water holding capacity.

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

Proximity to market, allowing for a reduction in freight costs.



### 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?

The RMA has been a total disaster in recognising maintaining and developing of protection of these soils often close by residential areas and lost to that development. Councils should not be allowed to make decisions where valuable soils are in situ. There should be firmer national guidelines and laws to prevent valuable soils being lost forever due to a lack of any planning concept and foresight within many regional councils.

There is also a very strong likelihood many of those decisions would have contravened Treaty obligations

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

No clearly it does not or there are so many gaps within it , it allows for wanton destruction of valuable food producing areas and environment. Intensive agriculture as an example dairy and also the criminal neglect of environment as practised by the forestry industry.

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

It is paramount to the future of all communities that their greatest asset being high value soils are retained for future generations.

### 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?

Simply it is not.

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



First and foremost. It is Taonga. Special rating zones as exist in BC Canada could be applied in order to protect these areas.



### 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?

Not at all, huge areas within the proximity of towns and cities in this Country has been lost. Pukekohe, Nelson, Marlborough Christchurch all examples.

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

Again retaining these soils is paramount. Their status should have no less protection than if they were within a National park.

### Section 3.4: Reverse sensitivity [page 26]

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

Sustainability the core issue. Not all primary production can be considered as such as equally the loss of valuable soils from food production.

Large areas of very valuable land have been lost as an example to the production of low quality wine in Marlborough. The region due to the virtual monoculture of viticulture on the plains has resulted in a situation where all food crops are now brought into the region.

Sustainability is about balance.

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

Education, the lobby groups and I use dairy as an example are confrontational. Each region should have something akin to an annual report on sustainability and management of total environment practises in land use. Public can then see what is of the most benefit.



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*Manatū Mo Te Taiao*

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Manatū Ahu Matua





### 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?

More than a problem it is a National issue.

Are you aware of other problems facing highly productive land?

Overuse of pesticides and chemical fertilisers.

### 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?

The only option as a go forward is a total re jig of the RMA. Resource Management Act that is what it says it is. That it what it needs to be.

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

National Policy Statements are not Law!

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

The Natioanl Parks Act is legislation there needs to be an Act protecting high value soil areas.



## 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?

In the first instance isolate out the valuable soils that are capable of producing high value nutritional crops, these soils are also likely to be the most capable of sustaining climate change. The soil maps exist.

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

A lot of primary production generally is on lower grade country, Sheep and beef as an example, traditional High country farming has been sustainable due to the nature of the soils and terrain. Farmers in those sectors understand that.

The threat to their industry now comes from forestry expansion which under current RMA restrictions is a rampant destroyer of environment and requires urgent control.

High value soils are generally located on the plains or volcanic areas. Obviously urban areas are located similarly.

## 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?

Obviously.

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

As stated the policy has to reflect sustainability and legislation.





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?

Obviously that is an issue for the RMA to cover, on the proviso high value soil areas are protected then urban expansion can only affect less inportant profiles.

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

Nationally. The failure of councils to manage the RMA is evident.

#### **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?

Retaining for future generations the capability to produce high value low cost nutrition and also to safe guard against aspects of climate change.

#### **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?

The maps are already there!

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

Any soils scientist can explain that.



## **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?

I have explained that as my point of view.

## **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)?

No, it is completely obvious we have to protect our high value soils as we would protect any other National asset.

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?

They are separate issues and that is the thought process required to maintain a sustainable equilibrium. Will urban expansion encroach on a National Park? Too much valuable land has been lost to urban development already.

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

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

## **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?



No less than normal urban expansion if high value land is at threat.



#### **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?

The rule of law.

#### **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?

All development on these soils requires to cease until those whom are drafting the statement understand the scale of what is involved. Essentially a national moratorium.

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

It should not.

#### **Section 5.6 Implementation [page 52]**

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

Awareness of Treaty obligations for a start, an assesment of the effects of climate change on food production in this Country and an inventory of areas within regions of the soils most importantly protected.



## 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?

More than influence more so a requirement for compliance

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?

Yes

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

All should be considered as a national inventory

### 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?

There is only one use for highly productive land.

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



Absolutely

### 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?

It is essential as we are a primary producing Country

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

It has been done.

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

Minimal I would think. Most councils will hold those records and or Linz

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

Their own records and submission to a national register



## 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?

Absolutely

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

Firstly use the existing soil maps to inventory the profiles on a national basis

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?

Reduced control would be a preference unless more rigid controls are put on council activity

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?

Possibly but until an inventory has been done it would be an unwise move.



### 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?

To isolate development to lower value land.

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?

The question is an Oxymoron.

### 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?

It should not occur under the status quo any further

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?

Yes absolutely.

### 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?

Legislation

### 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?

That councils would continue to manage the process as they have. There is very little upside until change occurs

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?

Compliance with law

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

Absolutely same rules apply



## Specific questions

### Section 5.5: Interpretation

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

Statistics on food production should assist in defining those issues.

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

Sustainability for future generations

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

No not until a complete inventory is done

## 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?

Absolutely.

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

Compliance to legislation

## 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?

Soils maps exist the councils should have them.

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?

Post or pre a re jig of the RMA? Post one would expect they would be following National guidelines to a greater degree



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