

Our reference: A1273838

2 October 2019

Ministry for Primary Industries
PO Box 2526
Wellington 6140

Attention: NPS-HPL Submission, Land and Water Policy Team

Dear Sir/Madam

Otago Regional Council submission on the proposed National Policy Statement on Highly Productive Land (NPS HPL)

Thank you for the opportunity to submit on the proposed NPS HPL. Otago's modern wealth remains highly dependent on the opportunities its land supports for primary production.

During the 2000's, the Otago Regional Council undertook the growOTAGO project, its purpose was to comprehensively map climate and soils across the Otago region. The information would support improving existing land uses, developing new, high value land-based activities and fostering regional economic development through the optimum use of Otago's varied climate and soils.

Today, the modern Otago showcases a range of primary industries, from the traditional agriculture, forestry and horticulture to the more recent and high value viticulture. The ability of Otago industries to grow a range of quality food types for both local, national and international markets lets the region share in the premium that New Zealand's primary goods are highly recognised and valued for.

Otago's landscapes and rural communities have also become an attraction for people to live, play and work in, and consequently Otago is experiencing significant growth, specifically in the Lakes District and Central Otago District.

With urban growth comes the pressure of conflict with existing rural based activities and the fragmentation of the rural landscape. This pressure is realised in reverse sensitivity of non-complementary activities and can become an ongoing source of tension in Otago's communities.

ORC welcomes national direction to assist with these pressures to ensure appropriate weight is given to protecting and managing New Zealand's stock of highly productive land in the planning framework.

Due to the important tension of managing the competing needs of urban development and retaining highly productive land, ORC is supportive of the development of the complementary NPS's - both the NPS HPL and the National Policy Statement for Urban Development.

ORC supports a national framework that will result in better protection for our land into the future, and clear integrated planning that ensures good quality outcomes in urban growth and productive land needs for now and future generations.

Principle of Protection under the NPS HPL

ORC is supportive of the NPS providing greater weighting within the planning framework for effects on highly productive land. ORC recognises the important shift that the NPS makes in that it is not just the soil characteristics of land that make it capable but many supporting attributes, such as accessibility of the land to transport, labour, water supply. ORC is supportive of the NPS HPL's holistic approach to assessing land as being HPL or not.

ORC considers a critical function of the NPS HPL should be to ensure that protection of sufficient land for food growing capacity for today, and future generations, is absolute. This should not only be assessed at a national level, but also at a regional/local level such that each region has access to a sufficient source and range of food product. This will lessen the impact on the food supply chain should there be any future system shocks, such as a natural disaster or other transport disruptions.

Outcome Sought: that the NPSHPL provides for some areas of highly productive land to be absolutely protected. While this absolute protection may not apply to all areas of highly productive land, the ability to have a cascade of protective mechanisms will provide additional security into the future. This may also assist in reducing the potential for inconsistencies between regions in implementing the NPSHPL. Areas with more urban growth pressures may protect less Land Use Capacity (LUC) classified land, which could result in more pressure on residual HPL.

Mapping Responsibility

ORC supports the intent of the HPL to provide certainty to plan users by mapping and including in Regional Policy Statements, areas of highly productive land. ORC does however have concerns that the cost and practicalities associated with completing mapping by 2022 have not been well considered. ORC believes it is in a reasonable position, with both its growOTAGO project and the National LUC mapping. However, both these datasets were not developed at a property level resolution, nor have they been subject to regular, criteria specific reviews. Achieving mapping to a property scale resolution will take some time and incur considerable expense.

ORC is concerned that there may not be enough practitioners to complete the work within the required time frame and that the implications of including the mapping into RPS's for territorial authorities that have recently undergone plan reviews, could be unnecessarily onerous.

Lastly, ORC is concerned that, due to the implications or perceptions of land having an HPL designation, considerable time and expense may result from challenges to the maps through the RPS. For Councils who have recently completed RPS reviews, this will likely create additional resourcing and cost challenges.

Outcomes Sought:

ORC would like the NPS HPL amended to allow some flexibility within regions, to accommodate TA's who have recently completed plan reviews, and would also like to see an ability to stage the mapping, by identifying the areas within regions that are most under pressure and addressing those areas first.

Further, a review cycle should be developed and programmed for the mapping and criteria of the NPS HPL to enable timely responses to climate change and changing technologies that inform the NPS HPL provisions and ultimate outcomes.

Yours sincerely



Gwyneth Elsum
General Manager Strategy, Policy and Science