



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.

Contact details

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

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



GF Rhodes Estate (owners of land at Prebbleton West Christchurch – Preferred Rural Residential Area 7 (marked orange) as identified on plan below:-



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.

Our Submission

Our particular interest is with the implications of the NPS-HPL for proposed rural lifestyle areas (including our land at Prebbleton as identified in this submission). Whilst we have wider concerns with the NPS-HPL our direct concerns would be met by the amendments set out below.

The Appendix A: criteria to identify HPL, should be amended as follows (additions in bold and underlined)

.....

Highly productive land excludes:

- a. urban **and rural lifestyle areas**; and
- b. areas that have been identified as future urban or **rural lifestyle zones** in district plans, **or identified as future urban or rural lifestyle areas in adopted non statutory plans which have been prepared under the Local Government Act**

5.5 Interpretation should be amended as follows:

Highly production land means:...

- c. *does not include urban **and rural lifestyle areas** or areas that have identified as a future urban or **rural lifestyle zone** or **as future urban or rural lifestyle areas in adopted non statutory plans which have been prepared under the Local Government Act***

Rationale – these areas have already gone through a planning merits and public consultation process, have been proven as ‘suitable’ for rural lifestyle development and investment decisions have been made reliant on these documents. Without the above amendments, these areas will be captured by Policy 4:

Policy 4: Rural subdivision and fragmentation includes

- c. directing new rural lifestyle development away from areas of highly productive land

We note that HPL is to include all Class 1-3 land until regional councils define in HPL their regional plans (by 2023). Most land adjoining existing townships in Greater Christchurch is Class 1-3 land, but not capable of sustaining significant food production (due to a combination of small parcels, existing and neighbouring land uses, land value etc).



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?

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

See requested amendment as set out above.

Specific questions

Appendix A: Criteria to identify highly productive land [page 41]

See our requested amendment above to App A

Should there be a default definition of highly productive land based on the LUC until councils identify this? Why/why not?

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



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?

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?
