# 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

**Name:**

Dr Stephen Palmer

**Postal address:**

Private Bag 31-907 Lower Hutt, 5040

**Phone number:**

04 570 9002

**Email address:**

Stephen.Palmer@huttvalleydhb.org.nz

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

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

Regional Public Health, Hutt Valley District Health Board

**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?

As a Public Health Unit, Regional Public Health (RPH) is charged with trying to protect the health of our resident population, including reducing and minimising the impacts of nutrition-related disease (ranging from nutrient deficiencies to obesity to diet related cancers). While local benefits are noted in the consultation document on the proposed National Position Statement on Highly Productive Land, we note that these benefits are considered primarily in relation to financial concerns and the financial cost and benefits of imports compared to exports. The short term and long term health impacts of changing land use or loss of highly productive land does not feature as a key policy consideration. Therefore, the lens we have brought to reviewing the proposed NPS-HPL is one of considering the short term and long term impacts on human health. This approach informs the content this submission.

As noted in the report "New Zealand's Food Story *The Pukekohe Hub*[1]", prepared for Horticulture New Zealand, there is a natural tension between urbanisation and productive land.

Similar to the Pukekohe growing Hub, which provides the bulk of fresh produce to the Auckland region, the Horowhenua growing hub provides productive fertile soils, a temperate climate, and easy and direct transport routes for the Wellington region.

In partnership with Wesley Community Action and other community groups, RPH has been able to utilise the Horowhenua growing hub over the past 5 years to assist in providing affordable fruits and vegetables to low socioeconomic communities around the Wellington region.[2] For example, for the year 2018/2019, the Fruit and Vege Co-op provided 52,800 orders or 369 tonnes of fresh produce to low socioeconomic communities across the Wellington region through Market Gardeners Growers Co-op.

Conversion of the Horowhenua growing hub market gardens for urban development, **will** impact the availability of affordable fresh produce across the Wellington region, with the biggest impact on those who already struggle to afford fresh produce.

*Impact on human health*

An adequate and secure supply of fruits and vegetables is the foundation to all nutrition interventions and fundamental to the maintenance of good health. Although often overlooked in favour of hospital interventions or pharmaceuticals, New Zealand's abundance of fresh food is in fact the starting point and building block for good health for all New Zealanders.

Throughout history, the development of our cities was dependant on nearby highly productive land to supply affordable, locally produced fresh food. Since the industrial revolution, however, urban sprawl has encroached on highly productive land threatening the viability of cities worldwide.

A New Zealand example of this is the historical growing hub of Te Awakairangi (Hutt Valley) whose market gardens were once the food basket that enabled the development and growth the Wellington City. As the population grew, new urban development in the Hutt Valley replaced the highly productive market gardens leading to the establishment of the Horowhenua growing hub.

The loss of highly productive land within our region has three major identifiable negative impacts on human health:

- Increased cost of, and decreased access to, fresh produce. This disproportionately impacts those on lower incomes;

[1] http://www.hortnz.co.nz/news-events-and-media/other-news/new-zealands-food-story-the-pukekohe-hub/
[2] http://www.rph.org.nz/public-health-topics/nutrition/fruit-and-vege-co-ops/.

- It will reduce our resilience to projected future global food shocks. This will be brought about by the confluence of climate change, population pressures and loss of highly productive land to urbanisation.
- Loss of land suitable for growing fresh produce is essentially irreversible. Once topsoil has been removed for the purposes of urban development, the impacts on human health will be protracted and ongoing, well beyond the planning timeframes of the NPS and current land resource management systems.[3]

At present, the negative impacts of the loss of highly productive land is not felt as significantly by advantaged families, as they are able to access supermarkets sourced with fresh produce.

As outlined in the MoH Eating and Activity Guidelines and the Nutrient Reference Values for Australia and New Zealand[4], regular consumption of fresh fruits and vegetables is fundamental to human health. Maintaining recommended intakes of five or more servings per day of fruits and vegetables remains a challenge for much of the population, especially those on lower incomes.

Across our region, the cost of fresh produce remains a significant barrier for poorer families. Our fruit and vegetable co-op is therefore meeting an important need across the Wellington region; its continued success relies on easy access to fresh produce from the Horowhenua growing hub.

In our ongoing conversations with the grower's co-op, market gardeners and local mayors over the past five years, there is a growing concern that an unconscious bias towards prioritizing urban development over protection highly productive land has emerged. This is likely to be further exacerbated by infrastructure development in our region, such as the Wellington's western corridor (i.e. the transmission gully motorway) which further threatens the Horowhenua growing hub with projected urban sprawl.

---

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

There is a growing understanding that quality soil necessary for growing fresh produce is essentially a non-renewable resource; this brings us to the understanding that land is capable of being highly productive in terms of growing human food and, specifically, fresh produce must be preserved at all costs.[5]

---

3 https://www.mfe.govt.nz/sites/default/files/media/RMA/Our-land-201-final.pdf http://www.fao.org/3/a-i4965e.pdf

4 https://www.health.govt.nz/our-work/eating-and-activity-guidelines https://www.nhmrc.gov.au/about-us/publications/nutrient-reference-values-australia-and-new-zealand-including-recommended-dietary-intakes

5 http://www.fao.org/3/a-i4965e.pdf

The benefits of local fresh produce are manifold and not limited to those of human health, as outlined above. They are numerous and extensive and can be found described in detail in the Lancet Report "Food, Planet, Health"[6].

Some of the benefits include:

- Decreased carbon emissions compared with imported foods;
- Decreased carbon emissions compared with meat production;
- Protection of topsoil from erosion through maintenance of green cover;
- Capture and retention of carbon into topsoil as compared with eroded or barren land;
- Maximisation of the caloric and nutrient content of food for the greatest number of people for a given area of land use;
- Greater flexibility and potential for sustainable land use into the future in comparison to urban development;
- Protection from, and mitigation of, the effects of climate-derived food shocks.

The fundamental value behind the taonga status of productive land, alongside a growing respect for traditional knowledge, is the confluence of environmental health and human health known as planetary health. From the perspective of planetary health, the health of future generations should be considered when planning for all aspects of modern life. This perspective takes us beyond our current planning cycles, which tend to focus only on short term goals such as, the next political cycle or the needs of the current generation. Planetary Health also reflects a growing understanding that the resources required to maintain planetary health are governed by geological time scales, not human time scales.[7]

Worldwide, fertile soil is diminishing at an alarming and accelerating rate severely compromising the global capacity to grow food needed to feed a population which is projected to surpass nine billion by 2050. Globally, 50,000 square kilometres of soil, an area the size of Costa Rica, is lost each year according to Global Soil Partnership[8][9].Therefore, the urgency and global responsibility for preservation of highly productive land lies with us all.

[6] https://eatforum.org/content/uploads/2019/01/EAT-Lancet_Commission_Summary_Report.pdf
[7] https://www.thelancet.com/commissions/EAT

[8] Global Soil Partnership: http://www.fao.org/sustainable-development-goals/news/detail-news/en/c/277113/

[9] https://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/edu/?cid=nrcs142p2_054278

The Food and Agriculture Organisation of the United Nations (FAO)[10] give five key reasons why soil preservation is key to the planet's sustainable future:

1. Healthy soil feeds the world
2. Soil, like oil or natural gas, is a finite resource and is non-renewable – "*its loss is not recoverable within a human lifespan. It can take hundreds to thousands of years to form one centimetre of soil from parent rock, but that centimetre of soil can be lost in a single year through erosion."*
3. Soil can mitigate climate change – *"Soil makes up the greatest pool of terrestrial organic carbon, more than double the amount stored in vegetation, it helps to supply clean water, prevent desertification and provide resilience to flood and drought, soil mitigates climate change through carbon sequestration and reduction of greenhouse gas emissions."*
4. Soil is alive, teeming with life
5. Investing in sustainable soil management makes economic and environmental sense

*"Across the globe, human pressure on soils is reaching critical limits," adds Vargas. "As per the principles outlined in the World Soil Charter and supported by FAO, good soil governance requires actions at all levels, from governments to individuals in promoting sustainable soil management."*

As this situation worsens, it is likely that importing fresh produce **will** become more intermittent and less reliable, thereby effecting the security of our local food supply. New Zealand has the capacity to grow sufficient food to feed the entire population well, but currently there is a bias towards exporting much of our fresh produce (see Valuing Highly Productive Land: Discussion Document Figure 1 page 13).

Protecting highly productive, non-renewable soil and land for future generations requires a fundamental shift in values away from prioritising economic concerns towards prioritising food sovereignty and resilience, human health and wellbeing.

---

[10] http://www.fao.org/3/a-i4965e.pdf

**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? |
| Does the RMA framework provide sufficient clarity on how highly productive land should be considered alongside competing uses? Why/why not? |
| How are values and wider benefits of highly productive land being considered in planning and consenting processes?<br><br>As an agency charged with protecting human health at a population level, we **recommend** that Health Impact Assessments be used as a fundamental tool for the consenting of land use[11]. Used properly, this tool will allow the effective weighing of costs and benefits of land use on human health. For example, comparing the benefits of shelter, through increased urban development, with ongoing food security.<br><br>It is our belief that proper utilisation of this tool would show that some land, which is currently being looked at for urban development, **should** be more appropriately preserved for food production. Urban development **should** be restricted to land, which although less convenient to develop, can still effectively meet the needs of urban development.<br><br>Due to the historic relationship between urban development and arable land, we believe it is imperative that we strengthen the tools available to appropriately weight the considerations of the impacts on human health of changing land use. Health Impact Assessments could help to achieve such appropriate weighting. |

**Section 3.2: Urban expansion on to highly productive land [page 24]**

[11] https://www.health.govt.nz/our-work/health-impact-assessment.

How is highly productive land currently considered when providing urban expansion? Can you provide examples?

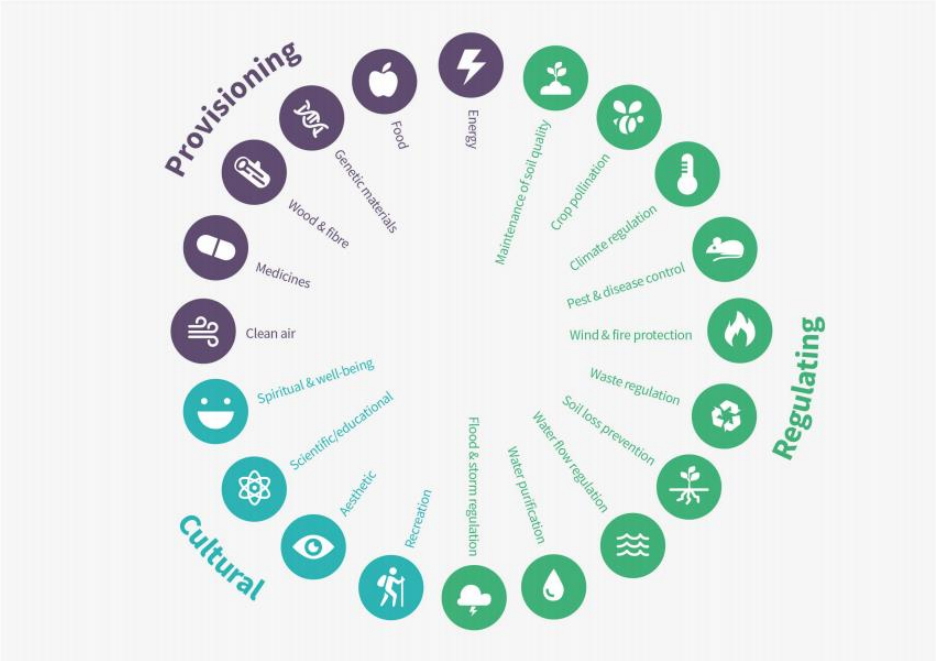
The importance of preserving highly productive land is currently a secondary consideration when councils are under pressure to consider providing land for urban expansion. We have learned through conversations with market gardeners, who provide produce for the Wellington Region Fruit and Vege Co-op, that considering highly productive land as a single exchangeable unit is naive.

We have learned that within the Horowhenua growing hub, there are differing soil conditions and microclimates which are suitable for different crops. It is not possible to plant any crop and expect to get a good harvest. For example, the land around the disbanded Kimberly Centre is the best area for growing potatoes in the Wellington region. This area is under pressure for wider urban development, meaning that our ability to effectively grow potatoes in our region could be lost. While at first glance this may not seem to be of high significance to those consenting land use changes, for the reasons discussed above, the assumption that we can source produce from further away if we lose our local productive land is a time bound assumption as highly productive land is universally under pressure.

The 2018 Ministry for the Environment's report: *Our Land 2018*[12], provides a useful model of 'Ecosystem services', describes the core components of the human – land use system and current rules and principles surrounding land use issues. Such a holistic view would be a useful regulatory guiding tool for decisions around changing land use.

[12] https://www.mfe.govt.nz/sites/default/files/media/RMA/Our-land-201-final.pdf

**Figure 5** **Ecosystem services**




Decision making principles or decision tools could be developed from this model to mitigate the multiple accumulating pressures on highly productive land. For example, there could be a requirement for developers to prove the land is not highly productive before urban development is permitted, for example, through soil tests and health impact assessments carried out by authorised and accredited professionals. Alternatively, officers issuing consents could be required to demonstrate that the consent will not have an impact on food supply.

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

**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? |

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

| |
|---|
| How should the tensions between primary production activities and potentially incompatible activities best be managed? |
| How can reverse sensitivity issues at the rural-urban interface best be managed? |

**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?

**Yes** we agree that there is an acute problem in appropriately identifying and protecting highly productive land.

We believe that the problem has been accurately reflected in this document but that the acute and chronic impacts on human health have not be effectively described, and are not effectively addressed by the preferred option. We **recommend** the addition of Health Impact Assessment tools to the review all changing land use.

Are you aware of other problems facing highly productive land?

As noted in section 2.4 of the discussion document, climate change is going to impact food production in particular areas of the country at an increasing rate. In our ongoing conversations with our produce partners over the past several years, they have reported already being impacted by climate change, whether this be crops rotting in the ground before harvest due to increased rainfall or failed harvest due to drought.

As outlined previously, crops have specific growing needs which are provided by specific soil conditions and microclimates. Pressures on the soil conditions and microclimates are set to increase with continued climate changes. Already our growers are experimenting season on season with different varietals to see if they can produce a more secure harvest under changing climate conditions.

These pressures are exacerbated by other challenges already described (e.g. highly productive land lost to urban development) and add to the urgency of preserving highly productive land for human health and wellbeing, rather than simply a resource for export profits.

As noted in the Ministry for the Environments 2018 report

> "Climate change is already affecting New Zealand's land systems. We can expect severe effects on land and human systems from long-term changes and increased frequency of intense rainfall events. These effects include challenges to productive systems (shifts in the suitability of land for horticulture and agriculture), pressure on indigenous ecosystems (with exacerbated impacts from pest invasions),

increased vulnerability to erosion, sedimentation of waterways, and wildfires, through increased risk of rainfall and drought events."[13]

---

**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?

Of the three options outlined in the discussion document, we **recommend** that a standalone National Policy Statement is the most appropriate way to effectively highlight and protect highly productive land, as it raises the consideration of highly productive land to be equivalent to considerations made for urban development.

We do, however, consider that the weighting should be such that highly productive land is considered ahead of urban development. As noted previously, urban development can occur on a wider range of land types than in comparison to land which can be used for the production of fresh produce.

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

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

As noted above, the addition of Health Impact Assessments to the tools for considering competing land uses would bring appropriate consideration to the long term impacts of changing land use on human health and wellbeing for future generations.

---

[13] https://www.mfe.govt.nz/sites/default/files/media/RMA/Our-land-201-final.pdf

**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?

For the reasons outlined above in section 3.5, we believe that highly productive land **will** continue to undergo growing pressures, not just from urban development but from the multiple impacts of climate change and the ongoing pressure of global population growth.

The essentially non-renewable nature of highly productive land means that the national position statements on urban development, freshwater and highly productive land **should** work together to preserve the best possible outcomes for the health and wellbeing of the resident New Zealand population well into the future.

We believe that Health Impact Assessment when used as a tool, common to the implementation of all three national position statements, **will** achieve the synergies of policy implementation and the best possible outcomes for human health.

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

**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?

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

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?

Due to the acceleration of pressures on highly productive land globally, we believe it would be inappropriate to exclude future urban zones from the scope of the NPS on highly productive land.

Land for growing fresh produce should be at the top of the hierarchy when considering competing land use. The benefit of taking this approach would be to maximise the potential for human health and wellbeing into the future. The cost of not doing so, is limiting and negatively impacting the future health and wellbeing of New Zealanders. This is in the context of a global food supply system where the population and environmental pressures are increasing but the amount of highly productive land is not.

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

Both, while national consideration of our total available highly productive land is useful, to understand what we have 'in the bank' so to speak, it is appropriate for the NPS on highly productive land to target areas where the pressures of urban development are greatest.

It is appropriate to match the land use decision making process we already have (regional and local) to reflect the unequal distribution of highly productive land around the country.

This could be achieved through the development of a national register or 'bank' of highly productive land.

**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?

An ideal management system for highly productive land would be one which appropriately weights the production of food for the resident NZ population, with one which considers all potential impacts on human health and wellbeing, weighting acute needs with projected needs of the current and future generations. We have proposed the inclusion of Health

Impact Assessment in the considerations of changing land use as the most appropriate way to achieve this.

---

**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?

Although land use decisions are currently made at a local or regional level, to reduce the impact on the entire resident population of New Zealand, a national bank including the current cropping and potential cropping for each type of soil **should** be kept centrally to track the total loss of highly productive land.

This **should** be owned and reviewed at regular intervals by the Ministry for the Environment at the very minimum. The intent **should** be to monitor changing regional uses of land while looking to maximise and preserve growing potential at a national level.

---

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

The proposed criteria, while relevant, does not sufficiently account for the consumption and health needs of the local resident population. For example, they do not assess the land available nationally to grow food sufficient for resident New Zealanders. The criteria should address accessibility, affordability, food sovereignty and food security.

These considerations should be addressed through the implementation of a national structure to measure and review the amount of highly productive land available, and in production across the country, as outlined above.

Under consideration point 'e' (policy 1 – Identification of Highly Productive Land)
*"the current land cover and use and the environmental, economic, social and cultural benefits it provides…",* inclusion of 'health' is **required.** This may go some way to ameliorating this oversight in the short-term.

---

**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?

**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)?

**Yes**, as well as the tensions discussed above in relation to competing pressures between urbanisation and food production, in our discussions with producers we have become aware of pressures between the NPS for freshwater and the production of fresh produce, particularly on clay based soils, which are prevalent in the Horowhenua growing hub.

We are aware that in conjunction with producers from the Pukekohe hub these Horowhenua producers are putting in a submission on the NPS for freshwater.

The issue they have identified is that the production of fresh produce on clay soils necessarily involves nitrogen inputs and run-off, as well as being a source of nitrogen (due to non-harvested parts of the plant being ploughed back into the field post-harvest).

While it is outside of the scope of this submission on highly productive land, it is important to note that these national policy statements have overlapping impacts. We **strongly recommend** they should be considered in conjunction with each other, particularly the impacts on the health and wellbeing of our resident populations.

We have been informed by Horowheua growers that the current proposals regarding nitrogen run-off levels in the NPS freshwater will make it almost impossible for them to continue their business if these national position statements are not considered together.

If this occurs, it will have obvious and immediate impacts on the affordability and accessibility of fresh produce for our resident populations. The competing goals of the national position statements as currently drafted provides further evidence for the incorporation of the Health Impact Assessment tool to all considerations of land use.

Considering the impacts on human health will allow government to support growers to provide food for the local market, whilst striving for better water quality nationally.

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?

Please see comments above about the inclusion of Health Impact Assessment tools in planning processes.

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

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

We **strongly recommend** highly productive land should be logged on a national register with the Ministry for the Environment.

Notwithstanding the primary principle of returning land to iwi, a total amount of land sufficient to feed our current and projected population should be 'banked' and considered a national taonga and protected from future considerations for urban development.

The 'bank' of highly productive land should include land suitable for the widest variety of fresh produce possible to ensure coverage of nutritional needs, as well as planning for and mitigating the projected local and global impacts of climate change.

As noted previously, due to the ongoing and accelerating pressures on highly productive land globally and the essentially irreversible nature of the loss of highly productive land, all land **should** be protected with legislation which considers land use analogous to that which considers the hierarchy of sensitivity of our conservation estate. Highly productive land being protected at the highest level. [14]

As noted in the Ministry for the Environment 2018 report Our Land.

> "The report reveals significant and fundamental gaps in the data, especially integrated data at a national scale. This means, for example, that while we can talk

[14] https://www.doc.govt.nz/get-involved/have-your-say/all-consultations/2017/proposal-to-review-the-land-classification-status-of-st-james-conservation-area/land-status-and-classification-options/.

generally about land use, we are not able to report in a detailed way on what happens where, how intensively the land is used, nor how that use is changing. Without better land use information we cannot fully understand the extent of pressures, the rate of change, or how emergent land use practices are likely to impact on our soil and biodiversity."[15]

**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? |
|---|

[15] https://www.mfe.govt.nz/sites/default/files/media/RMA/Our-land-201-final.pdf

**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? |

**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? |

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

**Section 5.6 Implementation [page 52]**

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

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

**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? |

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

**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? |
| Is the identification of highly productive land best done at the regional or district level? Why? |
| What are the likely costs and effort involved in identifying highly productive land in your region? |
| What guidance and technical assistance do you think will be beneficial to help councils identify highly productive land? |

**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? |
| 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? |

**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? |
| 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? |

**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? |
| 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? |

**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? |

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

**Specific questions**

**Section 5.5: Interpretation**

| |
|---|
| Do any of the draft definitions in the National Policy Statement need further clarification? If so, how? |
| Are there other key terms in the National Policy Statement that should be defined and, if so, how? |
| Should there be minimum threshold for highly productive land (i.e. as a percentage of site or minimum hectares)? Why/why not? |

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

**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? |
| 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? |

**Please use the space below to provide any additional comments you may have.**