



RUAPEHU DISTRICT COUNCIL

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To: Ministry for Primary Industries. Manatū Ahu Matua
Email: soils@mpi.govt.nz

Subject: PROPOSED NATIONAL POLICY STATEMENT – HIGHLY PRODUCTIVE LAND

Submission from: Ruapehu District Council
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Council does not wish to speak in support of its submission.

1 INTRODUCTION

- 1.1 The Ruapehu District is one of New Zealand's largest districts by land area, of which 36% is Crown owned. It has a small population of approximately 13,000 scattered throughout a wide geographical area of 6,730 square kilometres. The area is predominantly rural and includes the Tongariro and Whanganui National Parks. Most rural land is used for grazing and forestry. However, Ohakune has had a rich history of market gardening, and still produces significant quantities of vegetables. In particular, Ohakune is best known for growing carrots.
- 1.2 Ruapehu District Council supports the Proposed National Policy Statement on Highly Productive Land (NPS), and considers valuing highly productive land an important matter for subdivision, land use decisions, and plan development.
- 1.3 Ruapehu District Council also supports a national policy statement that provides guidance and direction for regional and district councils to produce their own plan provisions which reflect the local context.



2 SUBMISSION

- 2.1 It is important that the NPS is explicit about intended environmental outcomes and the accompanying policy is clear about direction in achieving them.
- 2.2 Greater clarity is needed, for example, around the purpose of the proposed NPS. If it is about protecting highly productive land to ensure that there is sufficient land available to feed the population into the future, then this needs to be clearly articulated from the outset.
- 2.3 An NPS offers an important opportunity to address some shortfalls in the Resource Management Act (RMA).
- 2.4 The RMA itself is not necessarily about best use, but rather environmental management in relation to the proposal. Therefore if the NPS is about moving towards the increased productive use of land and explicitly guides this, it would be a positive step.
- 2.5 In terms of application, a policy statement would be useful in relation to the productivity of lifestyle lots for example. Lifestyle lots do not necessarily remove land from productive use. Some are even more productive per hectare than larger properties, whilst others are not being used at all for productive purposes. Therefore trying to manage the future use of land, based largely on minimum lot sizes, without clear intention and outcomes may not be as effective as it could be.
- 2.6 The NPS also needs to be clear about whether valuing highly productive land is about avoiding urban density expansion where the loss of productive land is irreversible, or whether it is about guiding rural subdivisions towards best use, or both.
- 2.7 If the latter is intended, then subdivision rules will need to reflect economic land unit type provisions. This is something used many years ago with mixed results and something that planners and councils have been grappling with in regards to rural subdivision rules since the 1970s.
- 2.8 Even when the protection of productive soils along with maintaining rural character and amenity, and avoiding reverse sensitivity, has informed the formation of objectives and policies, district plan provisions have frequently been challenged and resulted in resource consent decisions being overturned on appeal.
- 2.9 In the current climate where cities are becoming increasingly congested and costly to reside in, lifestyle lots are more popular than ever meaning a policy statement is timely. The demand on land versus inadequacies under the RMA, means that lifestyle lots are often established (usually on the periphery of townships) in places where the most productive land can be found.
- 2.10 To ensure ambiguity is avoided and the intention of the NPS is fully realisable, the language and direction in the NPS needs to be clear and definitive.
- 2.11 The use of “uncoordinated” in Table 2 – Objective 3 is a good example of this point. Uncoordinated suggests that as long as urban zoning is ‘coordinated’, then urban expansion on to highly productive land is achievable as long as it is based on urban form principles where the provision of services would override the protection of productive soils.
- 2.12 Further, in Table 2 – under ‘Proposed Wording’ for the NPS, Ruapehu District Council



recommends that the objectives need to clearly distinguish between *urban* and *rural* subdivision and from which, if not both, that highly productive land needs protection.

- 2.13 Terms such as “inappropriate subdivision” and “fragmentation of land” which have been used for years, owing to their generality have struggled to distil clear environmental outcomes around what actually classes as inappropriate.
- 2.14 Even if objectives are clear, given traditional methods of managing lot sizes, implementation of an NPS may be a challenge without adopting a more reflective and finer grained approach to address the issue of productivity.

3 RECOMMENDATIONS

- 3.1 The Ruapehu District Council commends the Ministry for giving consideration to the protection of productive land through an NPS and thanks the Ministry for the opportunity to submit on the issue.
- 3.2 In light of the above discussion, and the examples provided, Ruapehu District Council recommends ensuring that the language used in the final version of the NPS, is clear and unambiguous so as not to undermine its intent.
- 3.3 Further, to ensure the NPS is effective, the purpose of the policy statement needs to be directional from the outset.
- 3.4 In addition, if the intention of the NPS is to prevent urban development where land use becomes irreversible for productive purposes, then the NPS will need to clearly support district plan provisions to avoid urban expansion onto highly productive land.
- 3.5 However, if the NPS has best use objectives for highly productive land at its core, then better guidance is needed for rural subdivision and land use that factors this in.

