



**Greater Christchurch Partnership**

**Te Tira Tū Tahī**  
One Group, Standing Together



# Submission

## Submission on the proposed National Policy Statement on Highly Productive Land:

National Policy Statement on Highly Productive  
Land consultation  
Ministry for Primary Industries  
PO Box 2526  
WELLINGTON 6140

Name of Submitter:  
Greater Christchurch Partnership

Address for further contact:  
Keith Tallentire  
Partnership Manager  
DDI: (03) 941 8590  
Mobile: 027 205 3772  
Email: [keith.tallentire@greaterchristchurch.org.nz](mailto:keith.tallentire@greaterchristchurch.org.nz)  
Web: [www.greaterchristchurch.org.nz](http://www.greaterchristchurch.org.nz)

c/o Christchurch City Council  
Civic Offices, 53 Hereford Street, Christchurch  
PO Box 73012, Christchurch, 8154

### Submission:

This is the Greater Christchurch Partnership's submission on the proposed National Policy Statement on Highly Productive Land (NPS-HPL) as outlined in the Valuing highly productive land discussion document (August 2019).

The Partnership fosters and facilitates a collaborative approach between the Partners to address strategic challenges and opportunities for Greater Christchurch through an agreed strategic framework to manage growth and address urban development, regeneration, resilience and long-term economic, social, cultural and environmental wellbeing.

This submission is made under delegated authority. The Partnership has not had the opportunity to endorse this submission at a formal committee meeting. The content of the submission follows overleaf.

Submissions from individual partner organisations are also being made and may cover more specific issues relating to their jurisdiction and statutory responsibilities.

Signed:



Bill Wasley  
Independent Chair

October 2019

# Overview

The Greater Christchurch Partnership (GCP) welcomes the attention to protecting highly productive land as part of the Government's efforts to balance environmental outcomes with economic productivity.

In this context, the Partnership agrees that the protection of highly productive land is a matter of national significance and a national policy statement could provide greater direction to local government on the weight to be afforded to such land as part of RMA decision-making.

However, the GCP believes that, in its current form, the proposed NPS-HPL objectives and policies in the discussion document may be too narrow in scope, provide limited clear direction and contain a number of inconsistencies.

We summarise the reasons for these concerns and provide further explanation in the rest of this submission.

This submission provides high-level comment on the key proposals in the discussion document. It should be read in conjunction with the detailed submissions from individual partners to the Greater Christchurch Partnership.

# Summary submission points

## **The Partnership supports:**

**greater direction being provided through a NPS-HPL with regard to the weight to be afforded to highly productive land as part of RMA decision-making.**

Primary production and the services that support the agricultural sector are significant contributors to the Canterbury and Greater Christchurch economies. The wellbeing of future generations will be strongly influenced by the ability to continue to use highly productive land for production that most benefits from it, so clear national direction on the weight to be afforded to such land as part of RMA decision-making is supported.

## **The Partnership has concerns with regard to:**

**the scope of the proposed NPS-HPL objectives and policies**

The discussion document suggests the scope of the proposed NPS-HPL to be primarily identifying and maintaining the availability of highly productive land, particularly by loss of this resource from urban expansion and lifestyle developments. It is less clear if and how production most benefitting from such land might be supported (not just in an RMA context) and how some forms of primary production which could reduce its availability for long periods might also be avoided.

**the broad lot size range identified as rural lifestyle development**

The range of 0.2 to 8 hectares that the NPS-HPL identifies as typically comprising rural lifestyle development underplays the significantly different impact such developments can have on highly productive land.

**the potential unintended consequences.**

Considering highly productive land in isolation may have undesirable effects. A significant area of land surrounding the urban areas of Greater

Christchurch comprises versatile soils (LUC Classes 1-3) so an overly restrictive approach to urban expansion could encourage urban growth more distant from the centres of employment these existing urban areas provide, with consequential impacts on the transport network and carbon emissions. A further unintended consequence may be that landowners may be incentivised to degrade highly productive land so that it might no longer be classified as such in future and allow for other (potentially more profitable) land uses.

**apparent inconsistencies and a the lack of clarity within proposed NPS-HPL objectives and policies.**

Greater certainty and clarity in the NPS-HPL could assist implementation and reduce the level of debate and potential costs placed on councils. Defining what may or may not be “productive” or “inappropriate” for example may be problematic and gives rise to uncertainty as to how decisions are made during the period this is being determined. On occasion direction is to “avoid” or “maintain” but other policies refer to “mitigation” or exemptions. These detailed matters and suggested refinements are covered more fully in partner council submissions.

## **The Partnership does not support:**

**the exemption in the definition of HPL being limited to urban areas and future urban zones in district plans.**

This does not take account of more strategic planning processes, such as future development strategies prepared in order to meet the requirements of the NPS on Urban Development (Capacity), which have considered and balanced the impacts on HPL with urban growth.

# Further explanation

## The existing policy framework in Greater Christchurch

The regional and territorial authorities in Greater Christchurch have for some time now undertaken collaborative strategic planning work to sustainably manage urban growth and protect rural resources, including versatile soils.

The Greater Christchurch Urban Development Strategy (UDS) was launched in 2007 and looked out to 2041, resulting from a collaborative strategic planning exercise involving extensive community engagement. It was informed by a strong evidence base which included an assessment of highly productive land and how this should be balanced with the need to provide for urban expansion and the range of housing choices demanded by a growing population.

Like many urban centres across New Zealand, Christchurch City and some of larger towns in Greater Christchurch were founded due to the proximity of the surrounding high quality agricultural region. This creates an inherent tension as urban areas grow and so requires careful consideration to provide for the wellbeing of future generations.

The Canterbury Regional Policy Statement (CRPS) already protects productive land by requiring the avoidance of development or fragmentation that forecloses the ability to make appropriate use of productive land for primary production.

Selwyn and Waimakariri District Councils have prepared rural residential strategies to enable limited and clustered locations for smaller, more manageable lot sizes on the edge of existing urban areas. This provision is influenced by a market preference moving away from more traditional 4ha lifestyle blocks, and so reduces the extent to which highly productive land is impacted. In determining the locations for limited provision of rural residential development these strategies included a criteria assessing their impact on versatile soils. Should the proposed NPS-HPL policies be retained it is likely that a re-assessment of this provision will be required.

So while the Partnership supports clear national direction on the weight to be afforded to such land as part of RMA decision-making, it believes the current policy framework is in some measure already managing the impacts of urban expansion and rural lifestyle development at present.

## Too little, too late?

From the cost-benefit analysis report provided in conjunction with the discussion document it is evident that the proliferation of rural lifestyle development occurred in the 1990s and 2000s and has subsequently reduced significantly.

Further encroachment through urban expansion and rural lifestyle development may be reduced in future through a combination of market drivers. These include changing demographics (an ageing population and smaller households), housing affordability constraints and rising transport costs. Smaller and multi-unit dwellings within existing urban areas will be increasingly more attractive to new households and the Government's Urban Growth Agenda is taking steps to facilitate the quality urban environments that would encourage this housing market shift.

If a precautionary approach is to be taken to protect the availability of highly productive land then it would seem logical that Government consider the range of mechanisms available to make best use of this resource. It is not clear from the discussion document that sufficient analysis has been undertaken on the extent to which HPL is currently being used for horticulture, the impacts such as climate change that could affect highly productive land, and the likely economic influences that might change future primary production. A clearer understanding of these matters underpins why HPL should be protected and would be fundamental to the proposed cost-benefit analysis councils would undertake when assessing urban expansion options.

## Our Space, the Future Development Strategy for Greater Christchurch

In June 2019, the Partnership adopted Our Space 2018-48: Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga, the future development strategy (FDS) for Greater Christchurch.

In the process of developing this plan consideration was given to balancing the impacts on HPL with the need to provide sufficient housing capacity for the projected demand for the types and price points of housing in different locations, as required by the NPS-Urban Development Capacity.

Our Space 2018-2048 provides valuable direction for upcoming district plan reviews in Selwyn and Waimakariri districts, but as a document prepared under the LGA 2002 it identifies but does not zone future urban development areas. The Partnership strongly advises that the exemption outlined in the definition of HPL includes such plans to avoid re-litigation of the appropriateness of these urban growth areas at a district plan zoning stage.

END