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Potential amendments to the NPS-HPL: Discussion document
Ministry for the Environment
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RURAL WOMEN NEW ZEALAND (INC) SUBMISSION

Potential amendments to the NPS-HPL: Discussion document

Introduction

Rural Women New Zealand (RWNZ) welcomes the opportunity to provide a submission to the Ministry for the Environment (the Ministry) on the Potential amendments to the NPS-HPL: Discussion document.

Comments

We note that there are two issues being consulted on. Our submission is set out in response to the options presented for each issue.

Issue 1: no clear pathway for new specified infrastructure is provided

1. RWNZ understands the need to address the lack of clarity in clause 3.9(2)(j)(i) and that the Ministry's preferred option to address this is to include the word 'construction' however we are concerned for the potential permanent loss of Highly Productive Land (HPL). RWNZ is also mindful of the balance required for thriving rural communities, including positive economic outcomes, along with the protection of natural resources.
2. We ask that in considering any amendment, the Ministry respects the Land Use Capability (LUC) classification of HPL, particularly Classes 1 (Most versatile multiple-use land) and 2 (Very good multiple-use land) to ensure this important rural asset is retained for its prime food production capability.

Issue 2: no clear pathway for new intensive indoor primary production and greenhouses

3. Regarding the consideration of a pathway for intensive indoor primary production and greenhouses to be located on HPL, we support the Ministry's reasoning that concerns must be balanced with the need to protect HPL for use in land-based primary production, both now and for future generations.
4. RWNZ agrees with the Ministry's approach of keeping the status quo (no change) in order to:
 - a) retain the policy objective of the NPS-HPL, and
 - b) allow for evidence on the impacts of the NPS-HPL on intensive indoor primary production and greenhouses (if any) to be collected.

Closing

Thank you for the opportunity to provide feedback.

About Rural Women New Zealand

Rural Women New Zealand (RWNZ) is a not-for-profit, member-based organisation that reaches into all rural communities to provide a credible and respected voice on rural environment, health, education, technology, business and social issues.

RWNZ strives to ensure that all rural residents, workers and families have equitable access to services, inequalities are addressed by Government, and the wellbeing of rural communities is considered from the beginning of all policy and legislative development.

RWNZ is affiliated to the Associated Country Women of the World and as such upholds all United Nations, International Labor Organisation (ILO), Food and Agriculture Organisation (FAO) and World Health Organisation (WHO) conventions and outcome statements as they relate to women and rural women in particular.

Nāku iti noa, nā



Gill Naylor
National President