

11 October 2019

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## **RURAL WOMEN NEW ZEALAND (INC) SUBMISSION**

### **National Policy Statement – Highly Productive Land**

#### **Introduction**

Rural Women New Zealand (RWNZ) welcomes the opportunity to provide a written submission on the proposed National Policy Statement for Highly Productive Land (NPS-HPL).

#### **General Comments**

1. RWNZ contests that any development on highly productive land is inappropriate. The context for us is the destruction of rural communities and food security.
2. The context should always be, food and fibre production first, in the context of food security.
3. The effects of development on highly productive land is always detrimental to farming families and communities.
4. Rural communities are essential to the social, cultural, economic and environmental wellbeing of New Zealand.

#### **Specific comments**

5. It is pleasing to see the NPS-HPL recognises that Highly Productive Land covers more than Highly Productive Soil. This gives recognition that other crops (including grapes) which require a range of differing soil types, not necessarily 'highly productive soil', along with suitable water and climate for successful cultivation.

6. It is also pleasing that the other important issue of Reverse Sensitivity is addressed in this NPS as, in harnessing the most efficient use of HPL for food and fibre production, those who live in proximity to HPL areas must be prepared for the results of that production.
7. Clear and workable procedures in planning processes are essential to ensure that food production and urban housing development are able to co-exist where the need arises.
8. Highly productive land is unequivocally highly productive land for its purpose: you cannot grow onions efficiently and effectively in high country, for example.
9. Costs associated with producing food, fibre and other products are greater on less suitable land which is less productive and further away from our main population centres.
10. RWNZ believes it is important to also future-proof land use.
11. Lifestyle blocks in the peri-urban space often produce food and fibre, primarily for the owner/occupier. The NPS-HPL must include provision for them and for nearby larger properties on the basis that both contribute to the national and export economy and are essential to the resilience and food security of local communities.
12. NPS –HPL should provide a definition of highly productive land and that the contribution to the local and national economies which should be used by Councils irrespective of the number of applicable properties within that Territorial Authority. An area with only a few farms this does not make the land any less productive.
13. Highly productive land should be managed by rural experts. The NPS-HPL should direct Councils and Territorial Authorities to use them when discussing proposed changes or reviews of district plans, planning regulations and other tools.
14. Guidelines to this management should be included in the NPS-HPL so that there is no confusion as to the impact of development of the highly productive land.
15. RWNZ appreciates the need for more housing, however, this should never be at the expense of highly productive land and respectfully submits that those with the appropriate farming expertise, experience or qualifications are most suited to determine management of such land.
16. The value and benefits of highly productive land are not just in income derived from it nor is it the taxes and rates paid to the relevant authorities. Highly productive land needs to be viewed as essential to farming businesses and other businesses where income is derived from the land, and therefore the families living on it and off of it, and therefore the communities that these enterprises and families sustain.
17. Intangible and flow-on value and benefits need to be viewed as far beyond the business directly involved must be recognised, including direct and indirect services and the people employed or residing in the surrounding area. Jobs are created in the initial business, those servicing that business, and the more generic community-type services that support the business such as retail, medical and educational, creating vibrant, balanced and thriving communities.

18. Our conservative estimate of the number of rural residents in New Zealand is about 600,000 – the second biggest population to Auckland. An NPS-HPL is necessary because this population is spread over New Zealand and Territorial Authorities must consider any impact on this entire, widespread population given the contribution of rural communities to our national economic wellbeing.
19. An NPS-HPL should provide direction and guidance via objectives to territorial authorities to protect highly productive land.
20. Identification of highly productive land should be undertaken at national level in the first instance using qualified experts. However, if undertaken at regional or local level, any analysis should consider any effects on the productivity of the land to the totality of New Zealand's land-based enterprises, the national economy, export economy and rural communities. For example, Pukekohe doesn't just supply onions to Pukekohe or Auckland.
21. If regional and local territorial authorities are to be asked to identify their highly productive land, they will require assistance from experts such as rural economists, soil experts, agronomists, farm advisors, farmers, farming families, etc to effectively do so.
22. Land protections could be tiered so that the land use categories don't necessarily pertain to productivity which would recognise that lesser soils on hill country that is suited to forestry and this is highly productive for that specific use.
23. The NPS on Urban Development should also give effect to highly productive land when greenfield developments or further subdivision of lifestyle or peri-urban areas are being considered. The NPS-UD should encourage appropriate intensification to protect food security while allowing spaces for social connection within that intensification and public transport hubs.
24. RWNZ requests that before the NPS-HPL is finalised, both a rural impact analysis and gender impact analysis be carried out to determine the impact of the document, guidelines therein and expected outcomes on rural New Zealand, on women in rural New Zealand and the intersectionality of both.

### **About Rural Women New Zealand**

25. Rural Women New Zealand (RWNZ) is a not-for-profit, member-based organisation that reaches into all rural communities and has an authoritative voice on rural environment, health, education, technology, business and social issues.
26. 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.
27. RWNZ is affiliated to the Associated Country Women of the World and as such upholds all United Nations, ILO, FAO and WHO conventions and outcome statements as they relate to women and rural women in particular.

28. RWNZ would like to draw particular attention to the United Nations Sustainable Development Goal 2; Zero Hunger, Goal 12; Responsible consumption and production, Goal 15; Life on Land and as always Goal 5; Gender equality.

Yours sincerely,

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