

Ministry for the Environment

National Policy Statement on Highly Productive Land

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry for the Environment's National Policy Statement on Highly Productive Land.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH.

General Comments

4. NMH welcomes the opportunity to comment on the Proposed National Policy Statement on Highly Productive Land (NPS HPL). This document will provide stronger national direction on how highly productive land should be managed.
5. NMH does have some concerns that the NPS HPL will not stop the incremental loss of highly productive land (HPL) overall. The consultation document defines the problem as it relates to the RMA. This approach masks the true nature of the problem which is the ongoing incremental loss of HPL for primary production purposes. NMH recommends that the problem definition is reframed in order to consider issues such as incompatible use, fragmentation, difficulty in preserving HPL.
6. Protecting land for food production and avoiding urban encroachment were matters of national importance in the RMA's predecessor, the Town and Country Planning Act 1977. These matters were not carried through to the RMA 1991 which research shows has had an adverse impact on productive soils.¹
7. Only 5% of land in New Zealand is suitable for horticulture.² Highly productive land grows better food more cheaply and with fewer environmental consequences³. NMH believes it is vital to have a NPS HPL in order to protect horticultural land that

¹ <https://www.rmla.org.nz/2019/05/02/protecting-land-for-food-production/>

² Collins A, Mackay A, Basher L, Schipper L, Carrick S, Manderson A, Cavanagh J, Clothier B, Weeks E, Newton P (2014) *Phase 1: Looking Back. Future requirements for soil management in New Zealand*. National Land Resource Centre, Palmerston North <https://www.mpi.govt.nz/dmsdocument/10400-future-requirements-for-soil-management-in-new-zealand>

³ <https://www.horizons.govt.nz/HRC/media/Media/One%20Plan%20Documents/One-Plan-Versatile-SoilsStandard-Copy.pdf?ext=.pdf>

surrounds towns and cities so that cheap locally grown produce can get to local communities thus supporting the local economy. Access to cheap fruit and vegetables is vital for people to maintain good health. The Ministry of Health recommends that New Zealand adults eat at least three servings of vegetables and two servings of fruit each day. Food insecurity occurs when people do not have enough food to satisfy hunger and have an insufficient limited diet. Food insecurity is closely linked to limited household resources and poor socioeconomic status⁴.

Purpose of the NPS HPL

8. The overall purpose of the NPS does not recognise the finite nature of HPL as a resource. Productive land is being reduced incrementally and, if left to continue, communities will be unable to feed themselves. Therefore HPL must be given priority status within the purpose statement of the NPS.

NMH recommends that the finite nature of the HPL is recognised within the purpose statement.

9. NMH recommends that the NPS HPL provides high level guidance around the need to protect highly productive land for food production, and directs territorial authorities to restrict development and inappropriate subdivision and activities on this land while encouraging its productive use. A Consumer New Zealand survey in 2017 showed that 70% of New Zealanders want to eat New Zealand fruit and vegetables.⁵ This type of provision would mean that communities can rely on local markets for the provision of food rather than being more reliant on productive areas located further away which will result in higher greenhouse gas emissions and higher prices as food prices will need to include transportation costs.
10. New Zealand's population is continuing to grow, therefore there will need to be an increase in the supply of fruit and vegetables. If the supply levels are not increased then prices will increase and this will reduce or limit the population's access to healthy food which will have subsequent health effects and potentially increase chronic disease.
11. As noted in the consultation document, climate change could change what we consider to be highly productive land. Changes in weather patterns across regions and extreme weather events will affect New Zealand soils. Climate change has the potential to increase erosion rates through hotter, drier conditions that make soils

⁴ Community and Public Health (2009) *Food Security*. Retrieved from <https://www.cph.co.nz/wp-content/uploads/foodsecurityreview.pdf>

⁵ Horticulture NZ (2017) New Zealand domestic vegetable production. <http://www.hortnz.co.nz/assets/Media-Release-Photos/HortNZ-Report-Final-A4-Single-Pages.pdf>

more susceptible to wind erosion as well as intense rainfall events triggering surficial erosion and shallow landslides.⁶ Highly productive soils suitable for food production do have high structural stability, and less prone to water logging and erosion, flooding or salt contamination⁶ however this could change over time.

12. NMH supports the approach that the Ministry has taken to considering the future effects of climate change by including a review of the proposed NPS at regular intervals to ensure it is fit for purpose and achieving its objectives.

13. NMH notes that New Zealand does not have a policy for food security. As noted earlier, New Zealand's population is growing which is placing further demand on highly productive land, and given the potential effects of climate change on productive land, further consideration needs to be given to food security issues for the domestic food chain. Horticultural NZ identifies that developing a food security policy is central to addressing sustainability concerns⁷ and NMH recommends that the Ministry for the Environment and Ministry for Primary Industries considers a food security policy.

Specific Comments

14. *Inappropriate – subdivision*: The NPS must include assessment criteria to determine what "inappropriate" means in practice.

15. *Land fragmentation*: NMH recommends that that a definition of land fragmentation is included in the NPS HPL.

16. *Policy 2: Maintaining highly productive land for primary production*:

- a. NMH supports the prioritisation of the use of HPL for primary production in particular, fruit and vegetable production.
- b. As stated in paragraph 8, the purpose of the NPS must also reflect this prioritisation.
- c. The wording in Policy 2(b) needs to be strengthened in order to offer better protection. The current wording states: "*Consider giving greater protection to areas of highly productive land that make a greater contribution to the economy*". The word "consider" weakens the

⁶ Palmer, A (undated) *The issue of Protection of Class I and Class II soils in the One Plan*, Soil and Earth Sciences. <https://www.horizons.govt.nz/HRC/media/Media/One%20Plan%20Documents/One-Plan-Versatile-SoilsStandard-Copy.pdf?ext=.pdf>

⁷ Horticulture NZ (2017) New Zealand domestic vegetable production. <http://www.hortnz.co.nz/assets/Media-Release-Photos/HortNZ-Report-Final-A4-Single-Pages.pdf>

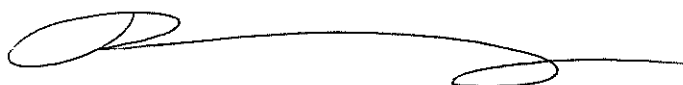
effectiveness of 2 (b). In addition, this type of consideration is subjective and could be manipulated.

17. *Question 5.3* NMH advocates that National Policy Statement on Urban Development ensures that future development strategies become binding and recognised under the Resource Management Act. NMH believes that future urban zones and areas are not excluded from the scope of the National Policy Statement on Highly Productive Land because urban areas must be able to feed their local populations from locally sourced produce in order for the towns and communities to be self-sufficient, resilient and healthy. By excluding this land from the scope of the NPS HPL, the proposal risks not meeting the Objective 2: *To maintain the availability of highly productive land for primary production for future generations.*
18. NMH recommends that National Policy Statement on Urban Development includes a requirement to consider HPL as a constraint
19. *Policy 3- New Urban Development:* The Proposed policy does not give enough protection of HPL and therefore will not meet the overall objectives of the NPS. NMH recommends that the protections in the policy are strengthened.
20. *Policy 4 – Rural subdivision and fragmentation and Policies 6 and 7 - Consideration of private plan changes and resource consent applications on HPL:* It is vital that HPL is protected and prioritised for plant and animal production but it must be noted that some intensive plant and animal production methods do not require access to HPL and occur in sheds or glass/plastic structures with concrete flooring that, therefore there must be mechanisms within district plans and planning standards where those activities are zoned where the land is not of high productive value.

Conclusion

21. NMH thanks the Ministry for the Environment for the opportunity to comment on the National Policy Statement on Highly Productive Land.
22. NMH **does not wish to be heard** in support of its submission.

Yours sincerely



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