

Further Submission on the Proposed Variation 2 (additional housing capacity) to the 2GP

Minute 17

The Chairman

The new National Policy Statement for Highly Productive Land 2022

As a rural landowner and farmer, I have noticed with growing concern the rate at which highly productive land is giving way to growing urbanisation and the demand for housing and the alarming rise in the number of lifestyle blocks.

The report, Our Land 2021 summary from the Ministry for the Environment states that the area of residential rural area (ie residential land outside city boundaries) more than doubled in the period 2002 to 2019.

Fragmentation of HPL can shift it out of commercial production. Land for lifestyle blocks typically has a higher value than land used for growing food giving land owners an incentive to subdivide their land into smaller blocks.

The new National Policy Statement on Highly Productive Land will shortly come into effect. The main purpose of the NPS- HPL is to protect highly productive land from inappropriate subdivision, use and development. The intention is that these land areas should be available for primary production, including growing fruit and vegetables.

The NPS still allows for urban rezoning of HPL but only under clearly defined circumstances. There are now levels of protection for HPL previously not available to Councils in assessing submissions for greenfield site developments.

The HPL in the Outram area is classed as LUC 1 as it is the best soil available especially for food production. Outram was once the food basket of the Taieri Plains supplying Dunedin with fresh produce until the decline of market gardening in the area from about 20 years ago. Since then there have been several developments in Outram, the price of land has increased and blocks of land are smaller making them unsuitable for commercial production.

The increased prices of the land and the higher rates with the large number of new expensive houses in the area has made it more difficult for aspiring food growers to put the HPL to its best use, growing food.

However it is not impossible. In recent years there are a number of small growers around the country using sustainable regenerative methods to grow intensively on small plots of land. Adrian Light of Earthlight Farm in Whanganui has leased land from a former market gardener. He uses bio intensive organic methods and has 0.6 of a hectare with glasshouses and plots growing a wide variety of produce to supply local communities and farmers markets.

The new NPS-HPL restricts rezoning of HPL where the loss of HPL outweighs the benefits of rezoning taking into account environmental matters. Climate change is a relevant environmental matter. The effects of Climate change are already here.

This is one farmer's story from April 2018. Andre de Bruin, whose property is on the outskirts of Dargaville, has been growing kumara for the past two decades. He produces 40 hectares of the purple tuber annually, but last year his yield was halved thanks to what de Bruin calls a "perfect storm" — drought followed by unseasonal amounts of rain right before harvest. Drought followed by flooding put a third of his crop under water.

In May 2017 two cyclones smashed their way through New Zealand, drenching growing areas in the North Island at a crucial time in the season and destroying swathes of crops. Seedlings which weren't washed away entirely by ex-tropical cyclones Cook and Debbie struggled to grow in the swampy mud, choking supply and driving up prices.

Another scenario to mitigate the effects of climate change involves the relocation of growing areas. The Bay of Plenty is where most kiwifruit are grown now, but by 2050 farmers may find they need to move further south as the area becomes too warm to produce a decent yield. But if crops have nowhere to move, then one option for adaptability has been lost.

The applicants claim the loss of HPL is insignificant. On the contrary it is very significant if the option to adapt to climate change by moving is no longer available. The housing proposed for these sites could go elsewhere on land of a lesser value for food production. Section 3.6 (2) a,b,c rezone land not HPL, intensification in existing urban areas, and rezone different HPL of lesser quality for housing.

The NPS on HPL is a significant step in the right direction for protecting HPL for our future and that of generations to come. The mechanisms are there for Council to protect HPL around Outram by refusing consent to this proposed subdivision.

Thank you for the opportunity to resubmit.

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