

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

Minute 17

The new National Policy Statement for Highly Productive Land 2022

The Chairman

Background to the use of HPL around Outram and environs

There are significant areas of highly productive land HPL of LUC Class 1, 2, and 3 on the Taieri Plain particularly in the areas nearer the river such as Outram. HPL is land especially suitable for food production as the history of market gardening around Dunedin indicates.

In the 1920s and 1930s Dunedin city was growing and market gardening moved from areas such as Forbury, Kaikorai Valley and Caversham to the Taieri Plains and was centred on Outram,

It was during the 1980's and 1990's that the produce auction system came to an end and supermarket chains increasingly used their power in the supply chain over growers and suppliers, preferring to deal with large growers from north of Dunedin.

The number of market gardens on the Taieri halved and then continued to decline. The peak for market gardening here was in the 1990s, because most of the other growers had left. When the last family ended operations it brought to an end nine decades of market gardens on the Taieri.

The Increased Fragmentation of HPL begins:

Following the decline of market gardening in the Outram area the land was sold for development. There have been 4 subdivisions in Outram in less than 20 years, all of these on HPL. Three of these subdivisions use about 20 ha of HPL, the other in Formby Street was also HPL. Consent was granted in 2017 to subdivide this strip of land along Formby Street into several sites. The block of land behind them (approx. 2.5 ha) has access to Formby Street and has a building platform.

In late 2021, Mr Horne sought and was granted a variation to the consent of 2017 to, among other things, further subdivide this block and move farm buildings to a different location on the block so using more HPL.

I fear that the further division of the land has created a potential for developers to increase the fragmentation of the HPL into sizes that would appeal to buyers seeking lifestyle blocks. The value of the land for housing would then make it prohibitive for those wanting to use it for productive purposes such as future market gardening.

An application for rezoning the land of all three applicants had already been submitted earlier in 2021 and was waiting for a hearing that is currently underway.

Applicant Statements and their Relevance to the NPS-HPL

The applicants acknowledge (para 50 of the Section 32 supporting document) that the site is entirely covered by HPL – Class 1. The applicant further states:

The high class soils within the site makes up approx. 2.2% of the high class soils surrounding Outram:

No longer used for market gardening
0.3% of Class I soils on the Taieri Plain
If not rezoned unlikely to be used for market gardening
On-going use is likely to be farming support operations
The loss of productive potential is insignificant
A low likelihood of the land being utilised as HPL
Little capital will be invested in it as a productive unit
From evidence of C Horne 5 August 2022

From the 2GP planning map there is approx. 470ha of HPL in the immediate surrounds of Outram (within 1.5 km). The site represents 3% of Class I soils on the Taieri.

Review of Applicants Statements

The applicant has only used Class I soils in his calculation of the percentages of Class I soil on the Taieri Plain. This ignores the Class 2 and 3 soil in close proximity to Class I (Map ref ourenvironment.scinfo.org.nz)

Yet the NPS states in 3.4 Mapping HPL that HPL is predominantly **LUC1, 2, or 3 land** and forms a large geographically cohesive area. By only including Class I soils the applicant gives the impression that this site is small, discrete and not geographically cohesive and therefore under 3.4.5(d) small, discrete areas of LUC 1,2 or 3 need not be included if they are separated from any large and geographically cohesive area of LUC 1,2,0r 3

The further statements that the loss of productive potential is insignificant, there is a low likelihood of the land being used as HPL and little capital is likely to be invested. They have not supported these assertions with any hard evidence.

Instead I offer the following:

The loss of the productive potential is not insignificant. The rapidly changing climate has brought increased temperatures, increased rainfall resulting in flooding, droughts and uncertainty regarding food supply. These scenarios will only worsen as the effects of climate change worsen. There are risks to our primary industries as these changes will affect what, where, and how much we can grow. Unpredictable weather affects productivity and security of food supply.

Locally grown food is fresher, nutrient richer, less carbon miles and provides a security of supply – flooding recently prevented trucks delivering food to Dunedin from Christchurch and further north. There were shortages of some fresh produce in Dunedin as flooding had also destroyed or damaged the crops. Small farms can offer variety of produce, security of supply, and a connection to the local community with employment. There are a number of examples throughout the country of successful small-scale market gardening;

Some examples of small scale, productive food-growing farms:

Roebuck Farm, Jodi Roebuck have small scale farm near New Plymouth where they farm intensively and sustainably so in an area of less than 3 hectares they grow a variety of crops including indoor-grown micro-greens and direct market everything into retail and restaurants.

Welcome Rock at Garston is a micro-farm using a bio-intensive cropping system. Based on low-tech, high yield methods of production, it uses an area of land approximately ¼ of an acre. It is a sustainable small scale farm producing high quality fresh produce to the local communities.

Tinaku Farm, home of Neudorf Black Garlic in Upper Moutere. This is a five hectare property growing diverse crops including garlic that they market through their website, restaurants and to the local Farmers' markets.

Wanaka Willows, Martyn Sinkinson began his small ¼ acre compact farm on an overgrown section near Albert Town using biologically intensive cropping systems to supply fresh produce to the local community.

Much is being done in various parts of the country on small scale farms, some of them less than 10 ha so I disagree with the applicants that there is little likelihood of the HPL being put to its best use, or that little investment of capital is likely. Many of the food growing enterprises I have mentioned do not need large scale farming equipment. The capital needed would be to buy the land that so sadly has been the victim of land fragmentation and speculation.

National Policy Statement:

3.6 Restricts urban rezoning of HPL

(a) the rezoning is required to provide sufficient development capacity
It is expected that the outer areas will have a surplus of development capacity because of the resolution of appeals, the decisions on Hearings 1-3 of Variation 2, and additional capacity from proposed greenfield sites. (Nathan Stocker)

(b) housing capacity may be met from elsewhere:
A significant amount of development capacity, of over 1500 houses that is reasonably expected to be realised has recently been enabled in/around Mosgiel, the outer suburbs, and the area zoned Taieri Rural Plains.

Further development around Outram will not achieve a well-functioning urban environment because there is a lack of infrastructure for the 2 Waters. The number of septic tanks is at capacity and a failure of this wastewater disposal method would have serious effects on freshwater. The Taieri River is close by and a bore there supplies Outram's drinking water. There are serious stormwater issues in times of heavy rainfall as this is not reticulated, the site is in a Hazard 2 (flooding area) and the nearby flood bank needs extensive repairs.

There is no public transport so an increase in the number of houses in Outram will lead to greater numbers of vehicle movements and increased carbon emissions as people travel not only for work but for study, cultural and social reasons.

(c) Do the environmental, social, cultural and economic benefits of rezoning outweigh the long term environmental, social, cultural and economic costs associated with the loss of HPL for land based primary production?

The benefits of rezoning do not outweigh the various costs associated with the loss of HPL.

The effects of climate change make it imperative that HPL is retained for food growing for food security. Quality soils are necessary for growing fresh produce which is essential for good human health. Soil is precious, a non-renewable resource and HPL is capable of

being highly productive in terms of growing human food and, specifically, fresh produce with high nutrient content so must be preserved at all costs. As noted above there are numbers of small farms in New Zealand being worked sustainably that provide employment and a sense of community.

While this land is not currently being used for market gardening, careful consideration must be given to the future and to take such a narrow view that there is little likelihood of the land being used again for market gardening denotes little consideration for future generations and lacks a wider view of who could use the land. For instance, could the land be made available, a lease arrangement perhaps, for schemes such as Youth Grow (PSSA), Malcam Trust or the Otago correctional Facility for pre-release employment training? Employment would be provided for local people and the food produced made available to food banks and for people who are struggling to provide fresh, healthy food for their families.

National Policy Statement

3.8 avoid subdivision of HPL

- (1) The proposed lots retain their overall productive capacity over the long term (2) avoids or mitigates any potential cumulative loss of the availability and productive capacity of HPL

Neither of these conditions can be met if the HPL is rezoned for housing and it will be lost forever to food production. The cumulative loss of HPL has been a problem on the Taieri for decades.

3.9 Protection from inappropriate use and development

- (2) At least one of the lists of 10 conditions for exception is met.

There is no risk to public health and safety, there is no matter of national importance associated with this land, there is no indigenous biodiversity to be maintained or restored, using the land for housing is not a temporary use, there is no requirement for public access, and various other exceptions under this clause.

- (3) Minimise or mitigate actual or potential cumulative loss of the availability and productive capacity of the HPL. Further fragmentation could result if this site rezoned. The actual cumulative effects of fragmentation are already felt in Outram with the number of housing developments already undertaken. The numbers of septic tanks were already at saturation point in the area before so many houses were recently built here.

3.12 Exemption for HPL with permanent of long term constraints – not applicable as there are none.

3.13 Support appropriate productive use of HPL

(a) must prioritise use of HPL for land-based primary production over other uses. Housing can be placed elsewhere on land of lesser quality.

(b) encourage opportunities to maintain or increase the productive capacity of HPL.

Clause (b) could be met by encouraging small productive farms that grow food using regenerative methods and ensuring sustainability.

(c) consider the cumulative effects of any subdivision, use, or development on the availability and productive capacity. There have been four recent developments in Outram and submission has already been made to rezone HPL for housing for a fifth development and another proposed development at Balmoral is the subject of an appeal.

I am asking for a wider view of the HPL near Outram than that provided by the applicants. The land must be protected from further fragmentation, land use change by stealth, and speculation that inflates prices. The NPS-HPL provides the means to protect this precious non-renewable resource for future generations who will bear the brunt of climate change and its effects particularly on food security.

Thank you for the opportunity to make a further submission.

Margaret Henry

