



TO THE

MINISTRY FOR PRIMARY INDUSTRIES

And

MINISTRY FOR THE ENVIRONMENT

ON THE

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

BY

Beef + Lamb New Zealand Ltd



SUBMISSION TO THE MINISTRY FOR PRIMARY INDUSTRIES AND MINISTRY FOR THE ENVIRONMENT

Submission on the Proposed National Policy Statement – Highly Productive Land

To: NPS - HPL Consultation Team
Ministry for Primary Industries
Wellington

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The specific provisions of the proposal that Beef + Lamb NZ Ltd submission relates to and the decisions it seeks are as detailed on the following pages. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the proposed National Policy Statement or restructuring of the proposed National Policy Statement, or parts thereof, to give effect to the recommended amendments.

Beef + Lamb New Zealand Ltd wishes to be heard in support of its submission.

INTRODUCTION

1. Beef + Lamb New Zealand (B+LNZ) is an industry-good body funded under the Commodity Levies Act through a levy paid by producers on all cattle and sheep slaughtered in New Zealand. Its vision is 'Profitable farmers, thriving farming communities, valued by all New Zealanders'.
2. B+LNZ supports the general intent and purpose of the proposed National Policy Statement – Highly Productive Land (NPS-HPL) in providing a framework by which New Zealand can develop and implement clear and meaningful policies that contribute to safeguarding the future of most versatile land for primary production and ensure future generations will be able to use that land to provide for their needs.
3. As an organisation and as a sector we welcome opportunities to build partnerships with the Ministry for Primary Industries (MPI) and Ministry for the Environment (MfE), and other crown entities, along with our wider communities, to collaboratively work to protect and strengthen the health and resilience of our communities and our environment.
4. As kaitiaki of their land, sheep and beef farmers operate on land that ranges in land use capability (LUC) classes 1 through 8 in diverse and productive systems. Sheep and beef systems are also widely distributed, from the most remote areas in New Zealand, rugged hills and mountains, to city peripheries. This means that the sheep and beef sector is particularly invested in the productive capability of soils; and this is why B+LNZ has, through its Environment Strategy, committed to leading the sector towards its vision of sheep and beef farms in ensuring that land use is closely matched to soil potential and capacity, where farmers are working to improve soil health, carbon content and productivity, while minimizing soil loss.



Figure 1: B+LNZ's Environment Strategy Pillars

5. The sheep and beef sector takes an integrated and holistic view to the sustainable management of natural resources. The sector is actively seeking solutions that enable and empower multiple benefits across New Zealand's range of natural assets including biodiversity, aquatic ecosystem health, soils, climate, and healthy vibrant communities.

6. One of the core tenets of B+LNZ's policy position is that the natural capital approach should be applied to the management of natural resources. Costanza and Daly¹ define natural capital as 'a stock of natural assets that yields a flow of ecosystem goods or services into the future'². Dominati et al³ further expand on this definition:

The notion of natural capital comes from framing the contribution of natural resources alongside manufactured capital (factories, buildings, tools), human capital (labour, skills) and social capital (education, culture, knowledge) to the economy (Daly, 1995) (Figure 1). The ecosystems approach has its origins in ecological economics, recognising that the economy is a subsystem of the ecological system and that sustainable economic activity needs to operate within the biophysical limits of the natural environment (Rockstrom, et al., 2009) (Figure 1). Natural resource scarcity, which includes the ability of the environment to assimilate emissions, is nowadays the limiting factor of economic development and human wellbeing.⁴

7. B+LNZ's natural capital, ecosystem approach to resource management is based on the principles of
- a. maintaining healthy natural capital stocks for ecosystem services provision; and
 - b. land use and management within ecological boundaries,
- to ensure a thriving future for the sheep and beef sector and the ability of future generations to provide for their needs.⁵

8. B+LNZ is actively engaged in environmental management, with a particular emphasis on building farmers' capability and capacity to support an ethos of environmental stewardship, as part of a vibrant, resilient, and profitable sector based around thriving communities. Protecting and enhancing New Zealand's natural capital and economic opportunities and the ecosystem services they provide is fundamental to the sustainability of the sector and to New Zealand's wellbeing for current and future generations.

9. The sheep and beef sector is essential to maintaining the vibrancy of rural communities and their cultural, societal, and environmental wellbeing, as well as contributing regionally and nationally to the country's economic wellbeing. While reducing its environmental footprint, the New Zealand sheep and beef sector has increased its contribution to New Zealand's economic wellbeing.

10. To build resilience across all our well-beings and provide for current and future generations, B+LNZ's view is that environmental policy and implementation pathways should incentivise behaviour change if and when required including rewarding early adoption, be transformative in design, and enable and empower individuals and communities to build resilience across all their well-beings, including ecosystem services, community and cultural wellbeing, and economic wellbeing. While policy and pathways need to provide for clear and timebound outcomes to enable business and community certainty including

¹ Costanza, R. and H.E. Daly. 1992. 'Natural Capital and Sustainable Development'. *Conserv. Biol.* Vol. 6, pp37-46. Annexed at Appendix A

² Ibid, p38

³ Dominati Article Annexed at Appendix B

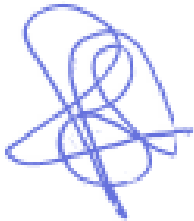
⁴ Ibid, p1

⁵ Ibid, p2

investment certainty, they will also need to provide carefully crafted frameworks which enable flexibility and innovation and provide for business and community adaptation.

11. As such it is imperative that domestic policy is not created in silo and that instead it provides a transformational policy foundation which will deliver not only on New Zealand's international commitments but will also enable and empower New Zealand's sheep and beef sector to continue to build diverse, resilient, productive landscapes for the benefit of all New Zealand and in maintaining vibrant thriving communities.
12. B+LNZ welcomes the opportunity to further discuss any of the points above or any of the following feedback with MPI and MfE, should you require more information.
13. For any inquiries relating to this feedback please contact Lauren Phillips on 027 279 0117 or lauren.phillips@beeflambnz.com.

Yours faithfully

A handwritten signature in blue ink, appearing to be "Lauren Phillips", written in a cursive style.

Lauren Phillips

Environment Policy Manager – South Island

10 October 2019

GENERAL SUBMISSIONS ON PROPOSED NPS-HPL

14. Soils are a farmer's most valuable resource. The soils in New Zealand are the productive base to sustainable primary industries. New Zealand's environment, society, culture, and economy, remain highly dependent on the opportunities its land supports for primary production and this is further imbued by the provision of ecosystem services.
15. The sheep and beef sector is focused on understanding the natural capital of our soils and optimising their use.
16. The sector uses LUC in tailored farm environment plans, or land environment plans, in order to understand vulnerability and opportunities in soils, geology, and topography and put in place farming systems, land uses etc. which optimise use of natural resources while managing limitations. These tailored plans assist farmers in linking ecosystem service maintenance with land management decision making designed to manage attributes of natural capital stocks, of which soil is an important stock, in a structured process.⁶ Doing so allows farmers to address limitations while optimising opportunities.
17. B+LNZ supports the decision to manage highly productive land through a national policy statement. A national policy statement is appropriate because it provides for flexibility, and allows for a more consultative process through the ensuing plan change process so that councils achieve local solutions to local problems.
18. However, B+LNZ does not support a one size fits all broad brush approach to managing resources and so supports more flexibility as opposed to more direction in maintaining the availability of highly productive land for primary production.
19. B+LNZ seeks that the decision to use a national policy statement to manage highly productive land is upheld.
20. The discussion document recognises the benefit that land based primary production generally offers New Zealand, for example on page 8. LUC 1-3 tend to be dominated by horticultural and cropping use, but those land classes are not exclusively under crop production. As sheep and beef farms are run on all land classes, and on areas which might be classified as highly productive and under this proposed NPS, and often operate

⁶ Maseyk, F., Mackay, A., Possingham, H., Dominati, E., Buckley, Y. March 2017. 'Managing Natural Capital Stocks for the Provision of Ecosystem Services.' *Conservation Letters*. Vol. 10 Issue 2, pp211-220. at page 5. Annexed at Appendix C

on the fringes of urban or lifestyle zones; urban expansion onto productive land, reverse sensitivity, and fragmentation also impact the sheep and beef sector. The sheep and beef sector is directly affected by the issues arising from urban growth.

21. For this reason, B+LNZ appreciates that the NPS-HPL does not limit the definition of highly productive land to just one sector or land use, however more guidance is needed to ensure that this isn't lost at a council level. Both the proposed NPS-HPL and its discussion document either imply or bias future decision making in favour of crop-based sectors. The NPS-HPL needs to be clear that protection of highly productive land needs to be irrespective of sector. It is the intrinsic quality and inherent flexibility of the land that should be protected, and it is the land's opportunity for future food production that should be preserved - whatever form that food production may take.
22. One of the ways that this bias or inference is made is through the words used to describe the land the NPS-HPL hopes to protect. The term highly productive land carries a value judgement that other land is not as productive at a purely economic level, and therefore not as valuable, and so more expendable to sacrifice for urban expansion. References in the document, for example, allude to deferring urban expansion to 'less productive land.' This represents a subtle but important difference from what was probably intended by the proposed NPS-HPL
23. The discussion document at page 15, section 2.3, uses the phrase 'less versatile'. Versatile is a more appropriate word to describe the land the NPS-HPL is trying to protect and it also does not carry with it the connotation that economic productivity alone should determine land use – at the expense of biodiversity, or ecosystem health.
24. 'Versatility' also recognises that LUC 4 land in the Mackenzie district might not be classified as highly productive, however LUC 4 in Central Otago might. The difference between the two is that, due to a number of non-LUC related factors, land in the Mackenzie district might be limited in the different primary production activities it can be used for, while the land in Central Otago might be less limited. Where irrigation is available, the land in Central Otago may be used for stone fruit and so might be classified as highly productive land. The difference between the two comes down to what they can be used for rather than their productivity, i.e. their versatility. The word 'versatile' also aligns better with the principles of the LUC survey handbook, annexed at Appendix D than the word 'productive' and is more holistic in its inference.

25. B+LNZ seeks that all references to 'highly productive land' and 'productive land' generally are replaced with 'highly versatile land' and 'versatile land.'
26. Sheep and beef land is productive land. This is true regardless of whether the system is intensive or extensive, LUC 1 or LUC 7, and tends to reflect the people who farm the land rather than just the land itself. Sheep and beef farmers have managed to increase meat production on often challenging landscapes while decreasing the total number of animals farmed; made significant progress in reducing their environmental footprint – all while losing some of their most productive land to other land uses. Since 1990, sheep numbers have reduced by over 50%, while the volumes of production are only 8% less. Beef cattle numbers likewise have reduced by around 20% since 1990. These reductions in capital stock while improving productivity has resulted not only in improvements in environmental performance, for example 21% reduction in nitrate leaching per kg saleable product, but has been accomplished while the sector has increased its exports by 83% to over \$9 billion.
27. Sheep and beef land is also valuable land. The sheep and beef sector is economically important at both the regional and national scale, which is recognised by the proposed NPS-HPL and its discussion document. The New Zealand sheep and beef sector's total value of production is \$10.4 billion, with exports worth \$7.5 billion and domestic sales worth an additional \$2.9 billion in 2018. B+LNZ's Economic Services annual New Season Outlook Report (annexed at Appendix E) released 3 October 2019 has forecast sheep and beef exports to pass \$4 billion each for the 2019-2020 season. The sector has 80,000 employees, of which 59,000 are directly employed and an additional 21,000 indirectly employed.
28. The sector is New Zealand's second largest goods exporter and largest manufacturing industry. The health and wellbeing of the red meat sector within New Zealand is important to the economy and regional New Zealand, accounting for 3.2 percent of gross domestic product.
29. More than economic benefits, sheep and beef farmers are active participants in their communities, and their farms are host to 2.8million⁷ hectares of native biodiversity, including 1.4million hectares of native forest. This is the second largest holding of native forest and native biodiversity – bettered only by the Crown estate. In some regions, such as the East Coast, there is more native biodiversity on sheep and beef farm land than in

⁷ Norton D., Pannell J., 2018. Desk-top assessment of native vegetation on New Zealand sheep and beef farms.

the Crown estate. Added to this is an estimated 180,000 hectares of forestry blocks. Sheep and beef farms are able to integrate indigenous biodiversity into their systems and contribute to net fauna and flora in their catchment and region.

30. It is important that sheep and beef systems on highly versatile land are protected from the adverse effects of urban growth, however it is important to recognize that sheep and beef land is productive and valuable regardless of whether it is on highly versatile land or not.
31. B+LNZ is concerned that analysis of potential adverse effects of the proposed policies has not been adequate and does not account for potential flow on effects on rural communities and pastoral land which will not classify as highly versatile land. The sheep and beef sector is essential to maintaining the vibrancy of rural communities and their culturally, societal, an environmental wellbeing, as well as contributing regionally and nationally to the country's economic wellbeing. The sector offers local employment and supports local businesses, while contributing to the fabric of the communities the farms are part of.
32. Where urban growth is directed towards less versatile land rather than simple directed away from highly versatile land, this can threaten rural communities in ways that the NPS-HPL does not recognise. B+LNZ expects that the direction will have significant adverse and disproportionate indirect effects on the sheep and beef sector.
33. Urban growth away from highly versatile land may be, by virtue of the location of a great deal of highly versatile land (as acknowledged by the NPS-HPL), growth at some distance from main settlements and towns. Land in primary production use is not exclusively in pastoral use, but tends to be mainly in pastoral use. Land which is most attractive for urban and lifestyle development tends to be lower slope land, flat and rolling. The practical reality of developing greenfield sites is that the developer will receive a greater return where the initial costs of investing are lower. Land under dairy tends to be more expensive per hectare than sheep and beef land, and intensive and irrigated sheep and beef land tends to be more expensive than dryland or extensive sheep and beef land. The cost of the land per hectare does not, in B+LNZ's view, directly correlate to the value of the land. This pricing difference, however, means that sheep and beef, particularly dryland sheep and beef, may be disproportionately indirectly affected by the NPS-HPL.
34. Urban and lifestyle growth in rural areas can have the following indirect adverse effects which have not been recognised by Figure 4.2- Identification of Costs and Benefits with the NPS or the NPS-HPL generally:

- a. Loss of biodiversity values on the sheep and beef land which is converted to the more intensive land use through fragmentation of habitat, clearance of habitat and corridors (including pasture, which New Zealand herpetofauna thrive in), increased predation by domestic pets, and increased noise and human activity; and
 - b. Loss of community identity and cohesion, especially where distance from settlements create a sub-community of commuters who do not integrate into or contribute to the cultural and social aspects of their community; and
 - c. Water quality issues where infrastructure is not available or inadequate to cope with the expansion, for example where the only means of wastewater treatment is by individual septic tanks for each residential or lifestyle property; and
 - d. Increased pressure on and conflict over water supply resources. In over-allocated areas, increased water supply demand for human consumption can have serious effects on primary production because human needs are a first priority take that trumps irrigation needs. Dryland that has been converted to urban and lifestyle properties may have been unirrigated for the fact that water is not an abundant resource. Increased demand would exacerbate existing water scarcity issues which would impact on local primary production as well as the natural environment; and
 - e. Reverse sensitivity issues for primary production land uses on non-highly versatile soils; and
 - f. Increased pressure on existing infrastructure and amenities with associated social impacts.
35. It is inappropriate and inequitable to simply pass on the problem of urban expansion to another sector, or community, or land class to protect highly versatile land.
36. B+LNZ seeks that the NPS-HPL evaluate and consider the flow on and indirect effects on the sheep and beef sector and rural communities of directing urban expansion away from highly versatile land and on to less versatile land. The NPS-HPL should be amended to avoid and mitigate these flow on and indirect effects. A new policy may be required to be added to the proposed NPS-HPL to achieve this.
37. Further, the NPS-HPL needs to recognise the mosaic of landscapes and their versatility at a range of spatial scales as provide by the LUC system and its application at both

national and farm scale levels (1:50,000 vs 1:10,000) and promote the recognition and use of these landscapes. Mapping at a 1:50,000 scale is inadequate and should be done at 1:10,000 scale at least.

38. B+LNZ also seeks that the NPS-HPL provides for the fast tracking of farm/paddock scale LUC mapping, and maintenance and upgrading of national scale databases such as LUCCS (Land Use Capability Classification Systems) held by Landcare research. This should underpin the implementation of the NPS-HPL and any other policy instrument that aims to manage soil resources.

Specific Submissions on proposed NPS-HPL

PROVISION	POSITION	REASONS	RELIEF SOUGHT
DEFINITIONS			
Highly Productive Land	Support	<p>B+LNZ supports the definition without prejudice to the preceding and with the qualification that clear and unequivocal guidance must be given to councils that the definition applies to the land itself regardless of the primary production activity the land is being used for, in line with the reasons already given in paragraphs 21-25 above.</p> <p>The word 'productive' should be replaced with the word 'versatile' for the reasons given in paragraphs 21-29 above.</p>	All references to 'highly productive land' should be replaced with 'highly versatile land' as per paragraphs 21-29 above.
Highly Productive Soils	Support	B+LNZ supports this definition without prejudice to the discussion on productive vs. versatile in paragraphs 21-29 above.	-
Land Use Capability	Support	-	-
OBJECTIVES			

Objective 1	Support in principle and in part	The word 'productive' should be replaced with the word 'versatile' for the reasons given in paragraphs 21-29 above.	<p>All references to 'highly productive land' should be replaced with 'highly versatile land' as per paragraphs 21-29 above.</p> <p>The following amendment is sought to Objective 1:</p> <p><i>Recognising the benefits of highly productive <u>versatile</u> land</i></p> <p><i>To recognise and provide for the value and long term benefits of using highly productive <u>versatile</u> land for primary production.</i></p>
Objective 2	Support in principle and in part	The word 'productive' should be replaced with the word 'versatile' for the reasons given in paragraphs 21-29 above	<p>All references to 'highly productive land' should be replaced with 'highly versatile land' as per paragraphs 21-29 above.</p> <p>The following amendment is sought to Objective 2:</p> <p><i>Maintaining the availability of highly productive <u>versatile</u> land</i></p> <p><i>To maintain the availability of highly productive <u>versatile</u> land for primary production for future generations</i></p>
Objective 3	Support	B+LNZ supports this objective in principle and without prejudice to any of the preceding or proceeding submissions.	<p>Retain with the following amendments:</p> <p><i>Protecting from inappropriate subdivision, use, and development</i></p>

			<p>To protect highly productive <u>versatile</u> land from inappropriate subdivision, use, and development, including by:</p> <ul style="list-style-type: none"> • Avoiding subdivision and land fragmentation that compromises the use of highly productive <u>versatile</u> land for primary production; • Avoiding uncoordinated urban expansion on highly productive land used for primary production that has not been subject to a strategic planning process; and • Avoiding and mitigating reverse sensitivity effects from sensitive and incompatible activities within and adjacent to highly productive <u>land used for primary production</u>.
<p>POLICIES</p>			
<p>Policy 1</p>	<p>Support in part</p>	<p>'Highly productive land' should be replaced with 'highly versatile land' for the reasons given in paragraphs 21-29 above.</p> <p>Regional authorities will be constrained by costs involved with identifying and mapping areas of highly versatile land within the region, and are unlikely to be able to ground-proof their findings. They are likely to rely on existing mapping datasets which may not be accurate or may only be available at an inappropriate scale for the purpose.</p> <p>Proposed Policy 1 should expressly allow for an avenue to challenge the regional council findings on whether or not a land parcel contains</p>	<p>All references to 'highly productive land' should be replaced with 'highly versatile land' as per paragraphs 21-29 above.</p> <p>Proposed Policy 1 should expressly provide for reasonable challenge to the regional council's identification and mapping. This should include the ability to ground-proof the findings.</p> <p>The mapping should also be required to be at a paddock scale as discussed in paragraphs 37,38 above.</p>

		<p>highly versatile land. The challenge should also be able to request ground-proofing of the regional council's findings, using an appropriately qualified and experienced practitioner. The regional council should provide that practitioner where the challenger requests one.</p> <p>Item f in the list of factors to consider when identifying highly productive land provides for where water quality issues or constraints may limit the use of the land for primary production. We note that this provision would likely result in no land not already used for cropping or horticulture purposes being identified in regions like Canterbury. The proposed provision highlights tensions between the proposed NPS-HPL and other policy instruments, for example the NPS-FM.</p>	
<p>Policy 2</p>	<p>Oppose in part</p>	<p>'Highly productive land' should be replaced with 'highly versatile land' for the reasons given in paragraphs 21-29 above.</p> <p>The current wording of subsection b to Policy 2 contains an implied value judgement along the lines of that discussed in paragraphs 22 and 23 above. B+LNZ assumes that the subsection intended to convey that consideration of and protection of highly versatile land areas should be proportional to the contribution those areas make to the economy and communities around them.</p>	<p>All references to 'highly productive land' should be replaced with 'highly versatile land' as per paragraphs 21-29 above.</p> <p>Delete subsection b. in its entirety.</p>

		<p>The current wording suggests, rather than a proportional approach, that the council should take a comparative or relative approach which can result on some areas being disadvantaged unnecessarily as a result. Some highly versatile land areas will already be advantaged and will offer greater benefit to their communities due to existing wealth and earlier development.</p> <p>Other areas will not yet offer comparatively as much to their communities because of historic disadvantages, poverty in the locality which precludes investment to develop, land only recently being returned indigenous owners, all of which would lead to less/ later development and use of that land. The latter areas will nevertheless have their own sense of identity and communities, biodiversity values, and value in the land itself; all of which would be adversely affected by urban growth.</p> <p>The current wording of would encourage further advantage for already advantaged economies and communities while making already vulnerable communities with existing disadvantages more vulnerable to urban expansion and its corollary adverse effects.</p>	
<p>Policy 3</p>	<p>Oppose</p>	<p>'Highly productive land' should be replaced with 'highly versatile land' for the reasons given in paragraphs 21-29 above.</p> <p>It is noted that the exception in subsection a.</p>	<p>All references to 'highly productive land' should be replaced with 'highly versatile land' as per paragraphs 21-29 above.</p> <p>Amend Policy 3 to ensure that the NPS-HPL is effective in protecting land in areas where shortages of</p>

		<p><i>Urban expansion must not be located on highly productive land unless... there is a shortage of development capacity to meet demand...</i></p> <p>Offers a means to develop highly versatile land for urban expansion in areas like the Auckland region in a manner that leaves the rest of the proposed NPS-HPL impotent to protect that land.</p> <p>This is especially true when read in conjunction with subsection b. bullet points 2 and 3.</p>	<p>development capacity to meet demand have already resulted in the loss of highly versatile land.</p>
<p>Policy 4</p>	<p>Oppose in part</p>	<p>'Highly productive land' should be replaced with 'highly versatile land' for the reasons given in paragraphs 21-29 above.</p> <p>B+LNZ opposes subsection c. for the reasons discussed in paragraphs 30-36 above.</p>	<p>All references to 'highly productive land' should be replaced with 'highly versatile land' as per paragraphs 21-29 above.</p> <p>Delete subsection c. in its entirety.</p>
<p>Policy 5</p>	<p>Support</p>	<p>'Highly productive land' should be replaced with 'highly versatile land' for the reasons given in paragraphs 21-29 above.</p> <p>The NPS-HPL is focussed on land rather than the land use, and it is important that councils are given guidance to ensure that, when identifying typical effects and activities associated with primary production activities on highly versatile land for the purposes of subsection a., the</p>	<p>All references to 'highly productive land' should be replaced with 'highly versatile land' as per paragraphs 21-29 above.</p> <p>Clear guidance should be given to council that the typical activities and effects associated with primary production include all sector types.</p> <p>Amend subsection d. as follows:</p>

		<p>councils also identify those effects and activities associated with pastoral primary production.</p> <p>The activities and effects associated with pastoral land use are different in nature, scale, and timing to those for cropping and horticulture. While the latter two might have issues around regular agrichemical spray, the sheep and beef sector generally does not. Conversely, livestock animals make noise and it is not possible to restrict that noise making to normal business hours. Urban and lifestyle residents are often not aware that animals make noise in the night and this gives rise to reverse sensitivity issues where farmers are unable to use their land bordering urban or lifestyle areas. Farmers have also reported their urban or lifestyle neighbours entering the farm without permission to move livestock to other paddocks.</p> <p>With regards to subsection d., the onus needs to be on the new residential or lifestyle land use to avoid or mitigate reverse sensitivity effects where development is allowed or has been allowed on the edge of highly versatile land.</p>	<p><i>Establish methods to avoid or mitigate reverse sensitivities at the interface between areas of highly productive versatile land and adjacent residential and rural lifestyle zones. <u>Where the territorial authority is unable to avoid reverse sensitivities as described, the burden of mitigating the effects will rest on the urban or lifestyle land use and not the primary production land use.</u></i></p>
<p>Policy 6</p>	<p>Support in part</p>	<p>'Highly productive land' should be replaced with 'highly versatile land' for the reasons given in paragraphs 21-29 above.</p>	<p>All references to 'highly productive land' should be replaced with 'highly versatile land' as per paragraphs 21-29 above.</p> <p>B+LNZ seeks the following amendment and additions to the proposed policy:</p>

		<p>B+LNZ supports this provision applying as an interim measure until territorial authorities have implemented the NPS-HPL.</p> <p>Subsection b. does not set a fair test where the land use on highly versatile land is extensive or sheep and beef, because the economic benefit of subdividing and selling lots of land will easily outweigh the economic benefit of sheep and beef production. This unfairly disadvantages some sectors comparative to others irrespective of the highly versatile land they are run on. It has the effect of protecting sectors rather than and or soils.</p> <p>The proposed policy would be more effective if it recognised that where rural land is rezoned, it almost inevitably will be subdivided and built on. At present it does not achieve this and rather leaves some of the important considerations to the subdivision stage, at which point it is too late to protect the highly versatile soils.</p>	<p><i>b. The benefits (environmental, economic, employment, social, and cultural) from the proposed use of land compared to the benefits from the continued use of that land for primary production; and</i></p> <p><i>...</i></p> <p><i><u>d. The extent to which the subdivision or development will impact on the existing and future use of the land for primary production; and</u></i></p> <p><i><u>e. The potential for reverse sensitivity effects and proposed methods to avoid or mitigate potential adverse effects on, and conflicts with, lawfully established activities; with the onus falling on the proposed new land use to mitigate any reverse sensitivities or conflicts.</u></i></p>
<p>Policy 7</p>	<p>Support in part</p>	<p>‘Highly productive land’ should be replaced with ‘highly versatile land’ for the reasons given in paragraphs 21-29 above.</p> <p>B+LNZ supports this provision applying as an interim measure until territorial authorities have implemented the NPS-HPL.</p> <p>Subsection e. does not set a fair test where the land use on highly versatile land is extensive or sheep and beef, because the economic benefit of subdividing and selling lots of land will easily</p>	<p>All references to ‘highly productive land’ should be replaced with ‘highly versatile land’ as per paragraphs 21-29 above.</p> <p>B+LNZ seeks the following amendment and additions to the proposed policy:</p> <p><i>d. The potential for reverse sensitivity effects and proposed methods to avoid or mitigate potential adverse effects on, and conflicts with, lawfully established</i></p>

outweigh the economic benefit of sheep and beef production. This unfairly disadvantages some sectors comparative to others irrespective of the highly versatile land they are run on. It has the effect of protecting sectors rather than and or soils.

activities; with the onus falling on the proposed new land use to mitigate any reverse sensitivities or conflicts.

e. The benefits (environmental, ~~economic~~, employment, social, and cultural) from the proposed use of land compared to the benefits from the continued use of that land for primary production.