



9 October 2019

Land and Water Policy Team
Ministry of Business, Innovation and Employment

Submission

The West Coast Regional Council (the Council) welcomes the opportunity to submit on the proposed National Policy Statement for Highly Productive Land (NPS-HPL).

Attached is the Council's submission.

If you wish to discuss any aspects of our submission, please contact the Council's Planning, Science and Innovation Manager, Hadley Mills.

Yours faithfully

Mike Meehan
CEO, West Coast Regional Council.

West Coast Regional Council Submission on the proposed National Policy Statement for Highly Productive Land (NPS-HPL)

The overall purpose of the NPS-HPL is to:

- recognise the full range of values and benefits associated with the use of highly productive land for primary production;
- maintain the land's availability for primary production for future generations; and
- protect it from inappropriate subdivision, use, and development.

The recognition in the draft document that allows for implementation to occur differently in different regions is supported.

The ability for only certain provisions to apply to some regions, and those regions with the highest level of urban/primary production pressure implementing all policies, is sensible. This ensures that the outcomes that are sought are achieved without costs to those regions with little benefit. The West Coast is such a region with only 0.63% LUC 3 land, and no LUC 1 or LUC 2 land. There is also no urban development pressure on the small rural areas with LUC 3 land.

The provision to allow for district plans to undertake identification before regional policy statements (RPS's) are updated, if an RPS has recently been made operative, is supported. It is noted however that 'recently' is not defined. The West Coast proposed RPS is currently going through Environment Court appeals, and is likely to be 'recently' operative once the NPS-HPL comes into effect. Allowing district plans to be updated before RPS's reduces costs to the region.

The West Coast Regional Council would like to see a similar identification process undertaken to ensure that land with high potential to provide minerals for our future needs is classified as important/significant, to avoid similar competing land use issues in the future.

The timeframes for adding identified highly productive land to RPS's and district plans may be too short for less resourced, rural councils, given the substantial amount of work that councils are required to do to implement freshwater and indigenous biodiversity NPS's, the upcoming changes to the NES for Air Quality, and the National Planning Standards. The national direction currently being released does not address which of these should have the highest priority, and for this Regional Council, the freshwater and indigenous biodiversity NPS's have greater challenges and are a higher priority. The timeframes for adding identified highly productive land areas to RPS's and district plans should be flexible to enable councils with fewer highly productive land issues to add any identified areas to RPS's and district plans at their next plan review or plan change.

This ends our submission.