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Via Email: highlyproductiveland@mfe.govt.nz

SUBMISSION TO THE MINISTRY FOR THE ENVIRONMENT AND THE MINISTRY FOR PRIMARY INDUSTRIES ON MANAGING THE USE AND DEVELOPMENT OF HIGHLY PRODUCTIVE LAND

Thank you for the opportunity to provide feedback on the proposed amendments to the National Policy Statement on Highly Productive Land (NPS-HPL). Queenstown Lakes District Council (QLDC) notes that the feedback sought is on two discrete issues¹ relating to the operability of the NPS-HPL. These two issues are:

- lack of a clear consent pathway for the construction of new specified infrastructure on highly productive land in clause 3.9(2)(j)(i). Specified infrastructure can include developments such as solar farms and infrastructure needed at pace, for example to support the recovery after Cyclone Gabrielle; and
- absence of a clear consent pathway for development and relocation of intensive indoor primary production and greenhouses on highly productive land.

QLDC is supportive of the changes proposed to the NPS-HPL for the following reasons:

- the proposed amendments would provide more flexibility for infrastructure that may have a functional or operational need to be located on highly productive land;
- the proposed amendments acknowledge that buildings are a component of land-based primary productive land uses; and
- landscape values (s.6 Resource Management Act 1991) will continue to be a consideration for new infrastructure and buildings, in particular when located on Outstanding Natural Landscapes and Outstanding Natural Features (ONL/Fs). The proposed changes to the NPS-HPL would not change any requirement for effects on ONL/Fs to be considered and appropriately managed through plan-making and resource consent processes.

QLDC would not like to be heard at any hearings that result from this consultation process. Thank you again for the opportunity to provide feedback.

Yours sincerely,



David Wallace
QLDC Planning & Development General Manager

¹Potential amendments to the NPS-HPL: Discussion Document, p18: [Potential-amendments-to-the-NPS-HPL-discussion-document.pdf \(environment.govt.nz\)](https://www.environment.govt.nz/consultation/2023/potential-amendments-to-the-nps-hpl-discussion-document.pdf)