

TDR – workshop 14 February 2013

Issues

- Threshold to qualify for TDR – is 500kg too simplistic?
- Donor Area – SP2 or whole catchment?
- Recipient Area – SP1 or extend to other areas?
- Controlling supply – how to maintain values?

Threshold

The proposed District Plan suggests 500kg nutrient loss reduction as the threshold to qualify for a 'bonus' TDR lot.

Advantages – Simple to understand, certainty, easy to administer.

Disadvantages – Too low for some farms and too high for others, potential to generate too many lots to maintain value, not flexible or equitable, could reward farmers that have not implemented any changes to land management, does not achieve target for total reduction.

Concern that the system as set out in the Plan is not flexible enough to reflect the merits of individual cases and should include other factors rather than a simplistic total reduction. How can TDR be allocated to best meet the needs of land owners, to reflect implementation of land management changes and to protect productive land? How many TDR should be allocated from a donor lot? Option to review the use of a matrix to determine whether a reduction is 'significant'.

Therefore it is suggested that the threshold requirement be reconsidered so that it is flexible and closely aligned to the principles that will be included in the Regional Water and Land Plan.

Donor Area

The proposed District Plan suggests a donor area - SP2 - that is just a part of the whole catchment, but which has a high proportion of dairy farms. The decision was taken to limit the area that the policy applies to and therefore the consequential impact on the character of the rural area. The approach taken is to start in a relatively small area that will have a significant impact because of the high proportion of dairy farms. The extent of the special planning areas can be considered as part of the rolling review of the plan.

However the whole catchment contributes to nutrient losses and there is therefore an argument that the donor area should be extended. The character of the donor area will not change significantly as a result of the policy.

The process will need to ensure that there is certainty about the implementation of any proposed reduction of nutrient losses that generates a TDR.

Recipient Area

The Plan proposes that the recipient area – SP1 – is restricted to an area that is relatively high value (lifestyle lots with lake views), but is reasonably accessible to the highway network and therefore to the facilities and services in the urban areas, is within an area that can be supplied by a public water supply and where there is potential to extend connections to the public sewer.

The recipient area could be extended to other parts of the catchment with similar characteristics. For the same reasons as for the SP2 donor area, the approach in the Plan is to start with a restricted recipient area and keep implementation under review. However the policy will have a more significant impact on the character and amenity values of the recipient area or areas.

Controlling supply

To be of benefit to the donor holding, the value of TDR needs to be high and reliable. In order to impose some control over the market for TDR, Council will restrict the supply of lots. It is suggested that the number of lots created is capped at a five year rolling supply (where the annual number of rural lifestyle lots created in the District over the previous six years has been 20).

The capping system will be separate from the Plan rules, as it will not be part of a process under the RMA. There will be an issue of first come – first served with this capping procedure and may delay the aspirations of some donor holdings. TDR will have an economic impact on the market for lifestyle lots in the District.