

NPS-HPL alignment analysis

The NPS-HPL directs territorial authorities to take certain actions when their decision-making impacts HPL, both for consent processing and for plan reviews/plan changes. The table below summarises what actions territorial authorities are required to take to give effect to the NPS-HPL through district plans and recommendations on how these provisions can be give effect to through the PDP.

NPS-HPL Policy	NPS-HPL implementation clause	Obligation for territorial authority	Extent to which this is, or can be, addressed by the PDP
<p>Policy 1: Highly productive land is recognised as a resource with finite characteristics and long term values for land-based primary production.</p> <p>Policy 2: The identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and urban development.</p>	<p>Clause 3.2 – Integrated management</p>	<p>Directs territorial authorities to identify highly productive land, and manage the effects of subdivision, use, and development of highly productive land, in an integrated way, particularly with respect to impacts on freshwater management, coordination of land use and subdivision activities region wide and taking a long-term, strategic and intergenerational approach.</p>	<p>I consider that this is generally addressed by the PDP – changes are required to align terminology but I consider that the general direction in the PDP with respect to protecting HPL and coordination of land use and subdivision activities already meets this clause.</p> <p>The key issues with the PDP HPL definition, in my view, are that it does not match the NPS-HPL, it is currently wider in scope than the transitional definition of HPL (as it includes LUC 4) and it is a subjective definition i.e. it includes other LUC classes that are, or have the potential to be, highly productive based on several factors that are also subjective (e.g. climate conditions, water availability). I consider that the PDP definition needs to be amended to align with the NPS-HPL transitional definition and future proofed to account for a point in the future at which regional maps of HPL are made operative in a RPS.</p> <p>There are many foundation provisions in the PDP that align with the direction of the NPS-HPL (e.g. RPROZ-O1, RPROZ-P5, RPROZ-P6). I consider that minor amendments are required to give effect to the NPS-HPL but it will not require a significant change in direction for the PDP.</p>
	<p>Clause 3.3 – Tangata whenua involvement</p>	<p>In giving effect to the NPS-HPL through its district plan, a territorial authority must actively involve tangata whenua (to the extent they wish to be involved).</p>	<p>I consider that there are limited opportunities to change the way FNDC are currently involving tangata whenua in the Schedule 1 process. A range of tangata whenua submitters have made submissions on the rural chapters and are able to be involved directly in those chapters through the hearings process. Clause 3.3 is a procedural requirement which is not practicable to implement any further at this stage in Schedule 1 process.</p>
<p>Policy 3: Highly productive land is mapped and included in regional policy statements and district plans.</p>	<p>Clause 3.4 – Mapping highly productive land</p>	<p>Primarily a clause directing how regional councils need to identify and map HPL in their region, however clause 3.4(4)(a) directs that this process needs to occur in collaboration with relevant territorial authorities.</p>	<p>This matter was discussed with NRC in a pre-hearing meeting on 7 October 2024. NRC confirmed that the preparation of HPL maps for insertion into the RPS is currently on hold (likely until at least February 2025 or longer) due to the uncertainty around future amendments to the NPS-HPL.</p>
	<p>Clause 3.5 – Identifying highly productive land in regional policy statements and district plans</p>	<p>This clause directs territorial authorities to include HPL maps in their district plan no later than 6 months after HPL maps in the Northland RPS become operative and that these maps must be exactly equivalent to those in the RPS. The territorial authority must include the HPL maps in their district plan using section 55(2) of the RMA (which means without using the Schedule 1 process).</p> <p>In the interim, clause 3.5(7) contains the transitional definition of HPL that must be used to give effect to the NPS-HPL prior to the RPS HPL mapping becoming operative.</p>	<p>As NRC are not progressing the preparation of HPL maps at a speed that will align with preparation of this section 42A report, I consider that the transitional definition of HPL in the NPS-HPL needs to be used as a basis for protecting HPL through rural land use and subdivision provisions. The definition of HPL in the PDP needs to align with the transitional definition of HPL in the NPS-HPL but should also be future proofed by referring to the regional maps when they are made operative in the RPS.</p>
<p>Policy 5: The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.</p>	<p>Clause 3.6 – Restricting urban zoning of highly productive land</p>	<p>Territorial authorities that are not Tier 1 or 2 must apply certain criteria before allowing the urban rezoning of highly productive land.</p>	<p>These provisions apply when changing an operative general rural or rural production zone (or nearest equivalent) to a new urban zone. Urban rezoning is defined to mean “changing from a general rural or rural production zone to an urban zone”. Under clause 1.3(4) of the NPS-HPL, general rural or rural production zones are to be treated as including the nearest equivalent zones under the ODP (because the New Zealand Planning Standards have not yet been implemented). The land in question must also be “highly productive land” for the purposes of clause 3.5(7).</p> <p>A specific rezoning proposal, whether proposed by the Council in the notified PDP or by submitters, needs to be considered against these definitions to determine whether the relevant criteria apply. This will be addressed through the zoning hearings, although I make some preliminary comments here.</p>

			Where land was zoned general rural or production zone (or nearest equivalent) under the ODP, and an urban zone was <i>not</i> proposed in the notified PDP but <i>is</i> requested in a submission, the criteria must be applied before determining the submission (provided the land is LUC 1, 2, or 3 for the purposes of clause 3.5(7)). However, where the notified PDP proposed urban rezoning, the exclusion in clause 3.5(7)(b)(ii) would likely apply, meaning the land is not required to be treated as HPL. It follows that the criteria in clause 3.6 would not apply in that scenario.
Policy 6: The rezoning and development of highly productive land as rural lifestyle is avoided, except as provided in this National Policy Statement.	Clause 3.7 – Avoiding rezoning of highly productive land for rural lifestyle	Territorial authorities must avoid rezoning HPL to rural lifestyle unless there is a permanent or long-term constraint on the land that meets the tests in clause 3.10.	For current purposes, these provisions apply to the rezoning of land which meets the interim definition of HPL in clause 3.5(7). As such, they relate to land that is zoned general rural or rural production (or nearest equivalent) in the ODP. Where land was zoned general rural or production zone (or nearest equivalent) under the ODP, and rural lifestyle or rural residential zoning (being the nearest equivalent to rural lifestyle) was <i>not</i> proposed in the notified PDP but <i>is</i> requested in a submission, the provisions must be given effect to in deciding the submission (provided the land is LUC 1, 2, or 3 for the purposes of clause 3.5(7)). In these circumstances, clauses 3.7 and 3.10 combined are relevant. It is my opinion that these two clauses read together set a very high bar for rezoning HPL to rural lifestyle or rural residential. The ‘avoid’ direction in clause 3.7 is very strong and, in my view, does not leave any avenue for rezoning aside from the tests in clause 3.10. In practice, the onus will be on a submitter seeking to zone highly productive land as rural lifestyle or rural residential to provide evidence of a permanent or long-term constraint that meets the tests in clause 3.10 (if applicable) to support their rezoning request through the hearing process. However, where the notified PDP proposed rural lifestyle or rural residential zoning, the exclusion in clause 3.5(7)(b)(ii) would likely apply meaning the land is not required to be treated as HPL. It follows that the provisions would not apply in that scenario.
Policy 7: The subdivision of highly productive land is avoided, except as provided in this National Policy Statement.	Clause 3.8 – Avoiding subdivision of highly productive land	<p>Territorial authorities are required to include objectives, policies and rules into their district plans to give effect to the following :</p> <p><i>(1) Territorial authorities must avoid the subdivision of highly productive land unless one of the following applies to the subdivision, and the measures in subclause (2) are applied:</i></p> <p><i>(a) the applicant demonstrates that the proposed lots will retain the overall productive capacity of the subject land over the long term:</i></p> <p><i>(b) the subdivision is on specified Māori land:</i></p> <p><i>(c) the subdivision is for specified infrastructure, or for defence facilities operated by the New Zealand Defence Force to meet its obligations under the Defence Act 1990, and there is a functional or operational need for the subdivision.</i></p> <p><i>(2) Territorial authorities must take measures to ensure that any subdivision of highly productive land:</i></p> <p><i>(a) avoids if possible, or otherwise mitigates, any potential cumulative loss of the availability and productive capacity of highly productive land in their district; and</i></p> <p><i>(b) avoids if possible, or otherwise mitigates, any actual or potential reverse sensitivity effects on surrounding land-based primary production activities.</i></p> <p>In terms of how to translate this direction into PDP provisions, the NPS-HPL Guide to Implementation sets out a useful summary of matters that could be implemented or considered by territorial authorities¹:</p> <ul style="list-style-type: none"> The rural subdivision objective(s) should direct that HPL is ‘protected’ for use in land-based primary production and that subdivision should be ‘avoided’ 	<p>I consider that the PDP generally gives effect to the subdivision direction of the NPS-HPL, in particular:</p> <ul style="list-style-type: none"> SUB-O2 provides for the protection of HPL (noting the definition of HPL in the PDP requires amendment to align with the NPS-HPL). SUB-P8 has strong ‘avoid’ direction for rural lifestyle subdivision in the Rural Production Zone unless it is via an environmental benefit subdivision and will not result in the loss of versatile soils for primary production activities (the term versatile soils will need to be replaced with a reference to HPL to align with the definition in the NPS-HPL, plus potentially LUC 4 land). SUB-P9 has a strong ‘avoid’ direction for rural lifestyle subdivision in the Rural Production Zone, unless it is by way of a management plan subdivision. However, I consider that this needs to be strengthened to ensure management plan subdivisions are not occurring on HPL or LUC 4 land. Reverse sensitivity effects are covered in RPROZ-O3 and RPROZ-P7, although I consider that there are opportunities to strengthen these with respect to the NPS-HPL and align wording with HPL terms. RPROZ-P6 provides a good link with the subdivision chapter but I consider that it needs to be better aligned with the NPS-HPL, particularly with respect to considering productive capacity and cumulative effects of subdivision and aligning terminology with the NPS-HPL. <p>There are other provisions that do not give effect to the NPS-HPL and will require amendment, including:</p> <ul style="list-style-type: none"> SUB-R6 – Environmental Benefit subdivision does allow for rural lifestyle sized lots to occur on versatile soils² (each individual allotment can have up to 15% versatile soils), which is not consistent with the direction in clause 3.8 of the NPS-HPL. The reference to 15% versatile soils should be replaced with a requirement for all environmental benefit lots to not contain any HPL. SUB-R7 – Management Plan subdivision does not prevent this type of subdivision occurring on HPL, which can involve rural lifestyle sized lots (average lot size of 2ha in Rural Production Zone). An amendment is required so that all management plan lots do not contain any HPL. <p>The provisions in the Subdivision chapter will be addressed in Hearing 16 – Subdivision in October 2025, however amendments to the Rural Production Zone provisions can be recommended through Hearing 9 – Rural, Horticultural and Processing.</p> <p>With respect to minimum lot sizes (which are covered in Hearing 9), the Rural Production Zone already has a controlled activity minimum lot size that, in my view, is likely to maintain the productive capacity of HPL (40ha). I consider that the discretionary activity minimum lot size (8ha) is potentially too small for some forms of land-based primary production, however high yield horticultural operations may be able to use lots this small and still maintain the productive capacity of HPL, particularly where there is good water access. I consider that a discretionary activity status for all additional proposed lots on HPL, regardless of proposed lot size,</p>

¹ <https://environment.govt.nz/assets/publications/National-Policy-Statement-Highly-Productive-Land-Guide-to-implementation-March-2023.pdf> - see pages 67-70

² As noted above, the term versatile soils will need to be replaced with a reference to HPL to align with the definition in the NPS-HPL, plus potentially LUC 4 land

		<ul style="list-style-type: none"> • There should be a focus on retaining “overall productive capacity” on all subdivided lots on HPL • Consideration on the end use of subdivided lots and whether the size of lots will result in land uses that are incompatible with land-based primary production on HPL • Consideration of cumulative loss and reverse sensitivity effects at the policy level • Consider how to best use minimum lot sizes and/or restrictive activity statuses to retain the “overall productive capacity” of the subject land over the long term (at least 30 years) • Consideration about whether amalgamation of lots and/or leasing arrangements or transferable development right subdivisions should be supported/incentivised • To not provide for rural lifestyle sized subdivisions on HPL 	<p>(combined with stronger objectives and policies relating to HPL) would be an appropriate way to give effect to the NPS-HPL as it will provide an opportunity to assess whether productive capacity of the land can be maintained and also have the ability to decline the application if the objective and policy direction of the PDP and NPS-HPL is not met. If the lots in the RPROZ are smaller than 8ha then the activity status will be non-complying, which also aligns with the ‘avoid’ direction in clause 3.8. The inclusion of a new rule that ensures all subdivision of HPL is a discretionary activity (at a minimum) will need to be recommended as part of Hearing Stream 16.</p> <p>The Horticulture Zone allows for smaller minimum lot sizes than the Rural Production Zone (10ha controlled, 4ha discretionary), however I consider that this may still be aligned with the NPS-HPL as this zone has been specifically identified as being suitable for high yield horticultural operations and 10ha lots are an appropriate size to enable that. However, I consider that there is a risk that 4ha lots as a discretionary activity could still be used for rural lifestyle purposes. As above, I consider that a discretionary activity status for all additional proposed lots on HPL, regardless of proposed lot size, (combined with stronger objectives and policies relating to HPL) would be an appropriate way to give effect to the NPS-HPL, and potentially non-complying for lots on HPL under 8ha to align with the RPROZ provisions.</p>
<p>Policy 8: Highly productive land is protected from inappropriate use and development.</p>	<p>Clause 3.9 – Protecting highly productive land from inappropriate use and development</p>	<p>The direction in Policy 8 and Clause 3.9 is clear that activities that are not land-based primary production should be avoided on HPL, unless they have a pathway under Clause 3.9. Clause 3.9(2) lists the activities that are considered to be ‘not inappropriate’ on HPL provided that the measures in subclause (3) are also applied. The list of activities is as follows (paraphrased from the wording of clause 3.9(2)):</p> <ul style="list-style-type: none"> • Supporting activities on the land (i.e. activities that support land-based primary production) • it provides for intensive indoor primary production or greenhouse activities • Addressing a high risk to public health and safety • Associated with, a matter of national importance under section 6 of the Act • An activity on specified Māori land • For the purpose of protecting, maintaining, restoring, or enhancing indigenous biodiversity • Providing for the retirement of land from land-based primary production for the purpose of improving water quality • A small-scale or temporary land-use activity that has no impact on the productive capacity of the land • An activity by a requiring authority in relation to a designation or notice of requirement under the Act • Providing for public access • Activities with an operational or functional need to locate on HPL that are associated with specified infrastructure, defence facilities, mineral extraction or aggregate extraction that provides significant national public benefit that could not otherwise be achieved using resources within New Zealand. <p>Under subclause (3), territorial authorities must take measures to ensure that any use or development on HPL:</p> <ul style="list-style-type: none"> • Minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of the HPL in their district; and • Avoids if possible, or otherwise mitigates, any actual or potential reverse sensitivity effects on land-based primary production from the use or development. <p>Territorial authorities are required to include objectives, policies and rules in their district plans to give effect to clause 3.9.</p>	<p>I consider that the activities provided for in the Rural Production Zone of the PDP generally give effect to the direction set out in clause 3.9 – the most notable difference being in the definitions used to capture certain activities. The term ‘land-based primary production’ is not used in the PDP, instead a distinction is made between ‘primary production’ and ‘farming’ activities, farming being a smaller sub-set of primary production activities. Primary production is a national planning standards definition and land-based primary production under the NPS-HPL is a narrower definition limited to activities that rely on the soil resource of the land. However, I consider that this definition is broader than the PDP definition of farming, which excludes forestry activities. I recommend an alignment of terms to give effect to clause 3.9 and which could either require replacement of the term ‘farming’ with ‘land-based primary production’, or addition of the words ‘and forestry’ after the word ‘farming’ to ensure alignment. The term ‘land-based primary production’ would ensure closer alignment with the NPS-HPL; however I am also aware that the term ‘farming’ is used extensively throughout the PDP (particularly in provisions for environmental overlays), and is used in provisions that are not intended to capture forestry. I consider it to be more efficient to add in the term ‘forestry’ in addition to ‘farming’ where ‘land-based primary production’ would otherwise be mentioned to avoid extensive consequential changes to other chapters of the PDP.</p> <p>In terms of policy direction in the Rural Production Zone, I consider that RPROZ-P5(c) is aligned with the NPS-HPL in that it requires avoidance of land use activities that would result in the loss of productive capacity of HPL.</p> <p>In terms of the clause 3.9(2) exceptions, I consider that there is some alignment with the activity statuses of various activities in the Rural Production Zone, notably:</p> <ul style="list-style-type: none"> • Farming activity being permitted • Farm quarry being permitted (supporting activity as it is restricted to servicing the production unit it is located on) • Visitor accommodation/home business/educational facility being permitted (small scale given the restrictions on the types of buildings they can establish in and the restrictions on scale) • Conservation activity being permitted (matter of national importance and/or indigenous biodiversity value) • Residential activity/minor residential unit being permitted (supporting activity when it is used as the primary residence for landowners and/or farm worker accommodation) • Mineral prospecting with hand tools being permitted (small scale, no impact on productive capacity of the land) • Rural Produce Retail/Manufacturing being permitted (supporting activities when related to the land based primary production activity directly) • Intensive indoor primary production being restricted discretionary (aligns with the activity not being inappropriate on HPL under clause 3.9) • Rural industry being restricted discretionary (supporting activity) • All listed discretionary and non-complying activities – I consider these to be appropriate activity statuses for activities not listed under clause 3.9 on HPL, no change necessary <p>However, there are a range of permitted and restricted discretionary activities in the Rural Production Zone that are appropriate in a rural zone generally, but not on HPL in accordance with clause 3.9(2), including:</p> <ul style="list-style-type: none"> • Forestry – the NPS-HPL allows for forestry on HPL, however the PDP restricts its location on versatile soils. In this instance the PDP is more stringent than the NPS-HPL. I consider that the forestry rules require amendment to align with the NPS-HPL but also the recently released National Environmental Standard for Commercial Forestry (NES-CF). I recommend deleting the reference to versatile soils, including advice notes clarifying that the PDP does not manage activities regulated under the NES-CF and amending rural rules relating to forestry so that they only cover forestry activities not regulated by the NES-CF.

			<ul style="list-style-type: none"> Recreational activity – although some temporary recreation activities are provided for on HPL under clause 3.9, I consider that permanent buildings or structures associated with recreation activities are not temporary and therefore should require resource consent if locating on HPL. Cemeteries/urupa, catteries and dog boarding kennels and emergency service facilities – I consider that these activities would result in a permanent loss of HPL so should be directed away from HPL. Papakainga (that is not on specified Māori land) and rural tourism activities being restricted discretionary – I note that these activities are not explicitly listed in clause 3.9 and would result in loss of HPL – and should therefore be directed away from HPL. <p>I consider that the Horticulture Zone land use rules better give effect to the NPS-HPL direction as there are fewer permitted activities, no controlled or restricted discretionary activities and the balance are discretionary or non-complying activities. However, some of the same issues identified with the Rural Production Zone above are the same for the Horticulture Zone and consistency across zone provisions is advised.</p>
	Clause 3.10 – Exemption for highly productive land subject to permanent or long-term constraints	<p>Clause 3.10 provides an exception for HPL to be subdivided, used or developed, provided that there are permanent or long-term constraints on the land that cannot be addressed through any reasonably practicable options and mean that the use of land for land-based primary production is not economically viable for at least 30 years, there is avoidance or mitigation of the matters in subclause (1)(b), and that certain benefits of the subdivision, use or development outweigh the long-term costs associated with the loss of the HPL for land-based primary production.</p> <p>There is no express obligation on a territorial authority to give effect to Clause 3.10 through objectives, policies and rules, however it provides a limited pathway for HPL to be subdivided, used or developed for activities not otherwise enabled under clauses 3.7, 3.8 or 3.9.</p>	<p>This clause may be relevant, for example, in a situation where HPL was zoned general rural or production zone (or nearest equivalent) under the ODP, rural lifestyle or rural residential zoning (as the nearest equivalent to rural lifestyle) was <i>not</i> proposed in the notified PDP but <i>is</i> requested in a submission, and a submitter has provided evidence (or signalled in their submission) that there are permanent or long term constraints on their land that justify the zoning change.³</p>
Policy 4: The use of highly productive land for land-based primary production is prioritised and supported.	Clause 3.11 – Continuation of existing activities	<p>Clause 3.11 gives direction to territorial authorities on how they are required to provide for the continuation of existing activities on HPL through objectives, policies and rules in district plans (noting that neither the NPS-HPL or district plans override existing use rights under section 10 of the RMA). There is recognition in clause 3.11 that there are activities already established on HPL that would now be considered inappropriate under Clause 3.9 but should still have a pathway to enable the maintenance, operation, or upgrade of these activities. The NPS-HPL Guide to Implementation provides some examples of how territorial authorities can provide for existing activities, including:</p> <ul style="list-style-type: none"> A specified date (typically the date of plan notification) as the cut off for what is considered to be ‘existing’ A permitted activity pathway provided no increase in footprint A permitted or controlled/RD pathway allowing for a specified increase in footprint Just use a more restrictive activity status with matters linked to minimising loss of HPL without a footprint cap 	<p>I consider that the PDP does provide for changes to some existing activities in the Rural Production Zone as permitted or restricted discretionary activities, notably:</p> <ul style="list-style-type: none"> RPROZ-R16 - Additions or alterations to an existing community facility (permitted but cap on scale of extension) RPROZ-R21 – Expansion of an existing mineral extraction activity (restricted discretionary) <p>I consider that these rules both require amendments to consider the loss of HPL when consent is required and ensure that any loss is minimised.</p> <p>In the case of other types of activities, I consider that maintenance, operation or upgrades are provided for through the generic activity status of the activity i.e. extensions of a permitted activity are permitted, extensions of discretionary activities are discretionary etc. Given that there are other wider reasons (other than HPL) to encourage commercial and industrial activities to locate outside of the RPROZ (and also not expand further), I consider that there is no specific need to be more enabling of extensions to these activities when loss of HPL is involved.</p>
	Clause 3.12 – Supporting appropriate productive use of highly productive land	<p>Clause 3.12 directs territorial authorities to prioritise and encourage appropriate productive use of HPL through objectives, policies and rules in district plans. The direction is that land-based primary production activities should be prioritised on HPL over other uses. The NPS-HPL Guide to Implementation states that when Clause 3.12 is read in conjunction with Clause 3.9, it supports a position that a land-based</p>	<p>In my view, the PDP generally gives effect to clause 3.12, however I consider that terminology needs to be amended to replace terms like ‘versatile soils’ and ‘farming’ with ‘highly productive land’ and ‘land-based primary production’ (or farming/forestry equivalent) to fully give effect to this clause.</p>

³ Note clause 3.10 does not apply to requests to rezone rural HPL to an urban zone – the appropriate test in that scenario is in clause 3.6.

		primary production activity on HPL should be prioritised over another rural activity that is not reliant on the soil resource of the land and that non-land-based primary production activities should be redirected to another non-HPL location in the rural environment.	
Policy 9: Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land.	Clause 3.13 – Managing reserve sensitivity effects and cumulative effects	<p>Policy 9 requires that reverse sensitivity effects are managed so as not to constrain land-based primary production activities on HPL. In addition to avoiding reverse sensitivity effects, Clause 3.13 also requires that territorial authorities include objectives, policies and rules in their district plans to ensure that the cumulative effects of any subdivision, use or development on the availability and productive capacity of HPL in their district are considered as part of any subdivision, land use or plan change application.</p> <p>Clause 3.13(1) sets out three directions for territorial authorities as follows:</p> <ul style="list-style-type: none"> (a) <i>identify typical activities and effects associated with land-based primary production on highly productive land that should be anticipated and tolerated in a productive rural environment; and</i> (b) <i>require the avoidance if possible, or otherwise the mitigation, of any potential reverse sensitivity effects from urban rezoning or rural lifestyle development that could affect land-based primary production on highly productive land (where mitigation might involve, for instance, the use of setbacks and buffers); and</i> (c) <i>require consideration of the cumulative effects of any subdivision, use, or development on the availability and productive capacity of highly productive land in their district.</i> 	I note that the PDP already contains direction to manage reverse sensitivity effects in the Rural Production Zone and Horticulture Zone but is silent on cumulative effects ⁴ . I recommend strengthening of the reverse sensitivity provisions (particularly with respect to matters of discretion) and including provisions that address cumulative effects at every level of the Rural Production and Horticulture Zone provisions to ensure the NPS-HPL is given effect to, from objectives and policies through to rules and standards.

⁴ The only references to cumulative effects in the Rural Production Zone and Horticulture Zone is in relation to impermeable surfaces and stormwater runoff. There is no mention of cumulative effects in the subdivision chapter.