

SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ



To: Ministry for the Environment

NPS Urban Development Capacity
Ministry for the Environment
P O Box 106-483
AUCKLAND 1143

Submission on: National Policy Statement Urban Development Capacity

From: Federated Farmers of New Zealand (Auckland Province) Incorporated

Date: 15 July 2016

Contact: Richard Gardner
Senior Policy Advisor

SUBMISSION TO MINISTRY FOR THE ENVIRONMENT

ON:

NATIONAL POLICY STATEMENT URBAN DEVELOPMENT CAPACITY

1 INTRODUCTION

- 1.1 Federated Farmers of New Zealand (Auckland Province) Incorporated (“Federated Farmers” or the “Federation”) thanks the Ministry for the Environment (“the Ministry”) for the opportunity to provide submission on its Proposed National Policy Statement on Urban Development Capacity Consultation Document (“the Proposal”).
- 1.2 In regard to this submission, Federated Farmers has engaged in some limited consultation with a proportion of its members with interests in its Auckland Province, and in particular with members with properties in areas that are most relevant to the parts of the Proposal with which Federated Farmers is concerned.
- 1.3 Federated Farmers looks forward to such further consultation with the Ministry about the Proposal as may be appropriate.
- 1.4 Accordingly, Federated Farmers would appreciate the opportunity to discuss this submission in greater detail. Federated Farmers seeks the opportunity to participate in any relevant discussions, workshops or hearings that might be held.

2. SUMMARY OF RECOMMENDATIONS

- 2.1 That the Proposal be proceeded with, subject to the following recommendations:
 - 2.1.1 That a new Objective OA4 be included as follows:

OA4: To ensure rural production activities on land adjacent to urban areas which are subject to ongoing development and change is able to continue.
 - 2.1.2 That a new Policy PA4 be included as follows:

PA4: Avoid development and change in urban areas compromising the safe and efficient operation of existing rural production activities or industry, including by ensuring there are adequate buffer zones to prevent reverse sensitivity effects from arising.

3. GENERAL COMMENTS

- 3.1 The broad purpose of this submission is to give the general support of Federated Farmers to principles behind the proposal to develop a National Policy Statement on Urban Development Capacity. It is understood that the Proposal is intended to address issues arising from:

- the rapid growth that is occurring in some urban areas;
- the consequent pressure to enable sufficient development-ready land for housing and business;
- the difficulties that regional and district councils have balancing competing priorities in making appropriate decisions that accommodate urban growth.

Further, it is understood that the Proposal will put specific requirements on local authorities to provide sufficient development capacity to meet demand by:

- connecting planning decisions with economics;
- requiring more responsive planning;
- rebalancing local and national interests by requiring decision makers to put greater weight on the national importance of there being sufficient land supply for housing and business growth.

It is understood that, to this end, the Proposal provides direction to decision makers regarding urban planning, with a particular focus on ensuring that planning enables development through providing sufficient capacity for housing and businesses. The Proposal is understood to be intended to help reduce regulatory barriers to the supply of housing and reduce the cost of housing relative to income. It is understood to require local authorities, through their regional policy statements and regional and district plans, to provide sufficient development capacity to meet long term demand, and to require that planning place a greater emphasis on monitoring what is happening on the ground, and responding to that.

3.2 As Federated Farmers understands it, the Proposal is intended to complement the Resource Legislation Amendment Bill 2015, which itself proposes new functions for regional and district councils to ensure that there is sufficient development capacity to meet expected long-term demand, where development capacity is the capacity of the land for development, taking into account:

- the zoning of the land;
- the provision of infrastructure that supports the development of land;
- the totality of development controls and rules that apply to land and which govern its capacity for development; and
- other constraints on land that materially prevent or hinder its development, including natural and human-made constraints.

3.3 Thus this submission is based on the proposition that the Proposal is aimed at ensuring there is adequate development capacity for business and housing, and it centres primarily around the impact that ensuring that such adequate capacity exists would be likely to have on areas of land that are in rural production and on the people that rely on making their living from such land. In this context, it is important to note that growth in urban areas does have an impact on nearby rural areas, which is a reason why Federated Farmers takes an interest in the Proposal. It is also noted in passing that, in Federated Farmers' view, the Issues Paper released as part of the Productivity Commission's current Inquiry into New Zealand's Urban Planning System indicates that the Commission is overly focussed on urban planning in the context of metropolitan areas, and tends to overlook the effects of urban planning in a metropolitan context on surrounding rural areas, including the towns and villages in those areas.

3.4 Federated Farmers seeks that the National Policy Statement on Urban Development Capacity properly recognise the role that rural areas play with respect to nearby urban areas, and vice versa. Federated Farmers considers it important that it be

recognised that rural production activities are major industries in the rural areas that surround urban areas, and that those rural production activities rely on a dynamic and enabling regulatory environment if they are to thrive. Thus Federated Farmers generally supports a permissive regulatory regime being applied to rural production activities in those rural areas, a factor which does not always lie easily when urban development is taking place in the vicinity.

- 3.5 A related point is that rural towns and villages play an important role in supporting rural production activities as well as those who are involved in rural production activities. Thus an issue that arises with the growth of these rural towns and villages is that the “gentrification” of these towns and villages which can sometimes accompany their growth can result in the loss of traditional rural services.
- 3.6 Most of Federated Farmers concerns with the proposal can be addressed under the head “reverse sensitivity”. It is disappointing that the Proposal touches on this important matter in only a very cursory manner (page 24), and then only in the context of older industrial businesses that are in areas with newer businesses and housing developing. Despite Federated Farmers providing feedback on the “consultation regarding a National Policy Statement on Urban Development” that took place earlier this year, and discussing the reverse sensitivity that arises between new urban development and existing rural activities, and despite Federated Farmers raising the matter of reverse sensitivity in its submissions on the Housing Accords and Special Housing Areas Bill 2013, no mention is made in the Proposal of the effects of reverse sensitivity in a rural context. Contrary to the assertion in the Proposal that the topic of reverse sensitivity is very complex, in the context of new urban development taking place on rural land it is relatively straightforward, and can generally be addressed by the provision of adequate buffer zones between new urban development and existing rural activities. In any case it is considered that growth should be allowed to take place only where the infrastructure needs of that growth, proportionate to the location of that growth, are already met or can be properly met to accommodate that growth.

4. SPECIFIC COMMENTS

4.1 Growth of towns and villages

- 4.1.1 Growth in Auckland is not confined to metropolitan Auckland, indeed part of the growth strategy that is included in the Proposed Auckland Unitary Plan is to provide for some 30 - 40% of the growth that is expected to take place in greater Auckland to occur in Auckland’s rural areas, mostly in towns and villages.
- 4.1.2 As is discussed in the General Comments section above, growth in Auckland’s rural areas does bring about some planning challenges, in particular the challenge of ensuring that important rural services that are based in those towns and villages are not driven away by the gentrification of those towns and villages. Often areas of “countryside living” are located on the outskirts of towns and villages, and ensuring there is sufficient provision of these to meet demand is also a challenge that seems sometimes to be ignored.
- 4.1.3 Federated Farmers considers that metropolitan urban growth into rural areas should be steered towards those locations where the growth will cause the least disruption to rural production activities, and that growth of towns and villages outside metropolitan areas should be designed so as to cause as little disruption as possible to the rural areas those towns and villages are in.

4.2 Reverse sensitivity

4.2.1 It is Federated Farmers' experience that reverse sensitivity issues inevitably arise when urban uses of land displace rural uses of that land. Federated Farmers wishes to see that reverse sensitivity issues are properly addressed in the National Policy Statement on Urban Development Capacity, when it is gazzetted. As the Proposal itself states (Page 20), the country's outstanding natural environment and rural economy are internationally recognised.

4.2.2 Thus Federated Farmers is particularly concerned to see that areas of productive land adjacent to areas designated to become urbanised are protected from reverse sensitivity effects that might arise from new activities taking place in such areas. The term reverse sensitivity is used to refer to the situation that arises when a sensitive activity, such as residential housing, establishes in the vicinity of a different, but legitimate, activity, particularly if it becomes necessary to restrain the existing activity in order to accommodate the new, sensitive, activity. It is considered, in the case of some urban activities, residential activity in particular, becoming established in rural productive areas, that the effects can be addressed by the provision of adequate buffer zones by the developers of the new urban activity, between the new urban activity and the established rural production activity.

4.3 New Objective OA4 and new Policy PA4

4.3.1 To address the above two matters, Federated Farmers recommends that a new Objective and a new Policy, both regarding outcomes for decision-making, and which apply to all local authorities, be included in the National Policy Statement on Urban Development Capacity, as follows.

OA4: To ensure rural production activities on land adjacent to urban areas which are subject to ongoing development and change is able to continue.

PA4: Avoid development and change in urban areas compromising the safe and efficient operation of existing rural production activities or industry, including by ensuring there are adequate buffer zones to prevent reverse sensitivity effects from arising.

5. ABOUT FEDERATED FARMERS

5.1 Federated Farmers of New Zealand is a primary sector organisation that represents farming and other rural businesses. Federated Farmers of New Zealand (Auckland Province) operates as a "branch" of Federated Farmers of New Zealand. At all levels, Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.

5.2 The Federation aims to add value to its members' farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and

- Our members adopt responsible management and environmental practices.



15 July 2016

Richard Gardner
Senior Policy Advisor, Federated Farmers of New Zealand

Address for service of submitter:

Richard Gardner
Senior Policy Advisor
Federated Farmers of New Zealand
Private Bag 92-066
Auckland

Telephone: (09) 379-0057
Fax/email: (09) 379-0782 / rgardner@fedfarm.org.nz
Contact person: Richard Gardner