

14 July 2016

NPS Urban Development Capacity
Ministry for the Environment
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Dear Sir / Madam

**FEEDBACK ON CONSULTATION DOCUMENT
PROPOSED NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT
CAPACITY**

1.0 INTRODUCTION

- 1.1 The Poultry Industry Association of New Zealand (PIANZ) and The Egg Producers Federation of New Zealand (EPFNZ) welcomes the opportunity to provide feedback on the consultation document for the Proposed National Policy Statement on Urban Development Capacity (the 'NPS').
- 1.2 The poultry industry is an important part of New Zealand's food chain. Poultry meat is the most popular protein consumed in New Zealand with approximately 38 kilograms per person consumed per year. Additionally, New Zealanders on average consume approximately 230 eggs per person per year.
- 1.3 PIANZ is the organisation that represents the interests of most poultry meat producers in New Zealand. Being part of PIANZ means that producers have agreed to meet both regulatory and industry imposed standards around animal welfare, food safety, animal husbandry and the expectations of consumers. EPFNZ is the national body representing the interests of all commercial egg farmers, including free-range, barn, colony and cage egg farming systems.

2.0 POULTRY OPERATIONS

- 2.1 The operations of the poultry industry are vertically integrated. Hatcheries and feed mills need to be located within proximity to broiler, egg layer and free range farms. Broiler meat producers need to be in close proximity to processing plants for animal welfare reasons and to avoid unnecessary travel.
- 2.2 There are specific requirements for the poultry industry in terms of animal welfare that places requirements on their operations to be located near the market for their product. The operations of the poultry industry can therefore be characterised by the need to be located in the urban-rural fringe.
- 2.3 PIANZ and EPFNZ do not specifically oppose the NPS; however, they are concerned that there is no specific recognition in the NPS for the consideration of primary production industries located in rural areas on the urban fringe.



3.0 PRIMARY PRODUCTION CAPACITY

- 3.1 The use of rural land for primary production is a key contributor to New Zealand's economy. The potential of a sprawling urban form into the urban-rural fringe could have significant implications for the industry through the loss of rural productivity and the reduction in the capacity of the primary production industry to provide food for the urban population.
- 3.2 PIANZ and EPFNZ are concerned that the implementation of the strategies that are required to be developed by local authorities containing High and Medium Urban Growth Areas identified by the NPS will create operational, financial and environmental pressure on their industry from the sprawl of urban development.
- 3.3 The very nature of the environmental effects generated by activities in the primary production industry, means that they need to be located in rural areas. The industry acknowledges that their operations have the potential to generate environmental effects and therefore considers it appropriate for planning documents to contain provisions to manage these effects. However, it is just as important that planning documents also manage the reverse sensitivity effects that may result from sensitive activities, such as urban development, establishing near existing primary production activities or in areas where new primary production activities could reasonably be expected to establish.
- 3.4 Rural areas with larger parcels of land and a lower density of sensitive activities are the most appropriate areas for primary production activities to locate. Therefore the fragmentation of rural land by subdivision and the development of land for urban purposes is a significant issue for the establishment and ongoing operation of the primary production industry.
- 3.5 In a practical sense, the fragmentation of rural land can make it difficult to use the land for productive purposes because the properties are not large enough to provide appropriate buffer distances. The increase in land value as a result of surrounding urban development can also make it uneconomical to continue to use the land for production purposes. The consequence of this is that many farms cease operations and do not re-establish.
- 3.6 If the NPS does not consider the interaction of urban activity and urban growth with activities of the primary production industry in rural areas, there is the potential to reduce primary production capacity, to create pressure on food supply, and to generate adverse reverse sensitivity effects between incompatible activities.

4.0 PLANNING HEIRARCHY

- 4.1 PIANZ and EPFNZ are cognisant of how the NPS will be placed and considered within the hierarchy of planning legislation in New Zealand. This hierarchy is important to consider in the context of the operations of the poultry industry and those of other primary production activities.



- 4.2 In the consideration of any resource consent application for an extension to an existing primary production activity or the establishment of a new primary production activity, the hierarchy of planning legislation guides decisions made by the relevant authority. First and foremost is the consideration of the purpose and principles of the Resource Management Act 1991, then the provisions of any National Policy Statement or National Environmental Standard, then any Regional Plan and District Plan.
- 4.3 PIANZ and EPFNZ are therefore concerned that with the implementation of the NPS, greater weight and consideration will be given to urban development over primary production in the decisions made by local authorities and the Environment Court. The NPS as it is currently worded creates the potential for bias and decision making based on activity type rather than the environmental effects created by the activity.

5.0 SUGGESTED CHANGES TO THE NPS

- 5.1 For the reasons outlined above, it is important that the NPS contains provisions to recognise the interaction between urban development and primary production. Taking the matter further, PIANZ and EPFNZ would like to start discussions with the government, together with other organisations who represent the primary production industry, around the possibility to develop a National Policy Statement on Primary Production Capacity.
- 5.2 Suggested changes to the NPS are outlined below (deletions in strikethrough and additions underlined).
- 5.3 Section 5 Objectives, Objective Group D – Responsive Planning. Insert new Objective OD3 as follows:
- ‘OD1: *To ensure that planning decisions enable urban development in the short, medium and long-terms.*
- OD2: *To ensure that in the short and medium terms local authorities adapt and respond to market activity.*
- OD3: *To ensure that planning decisions to enable urban development integrates with, and supports, the primary productive capacity of the rural area.*
- 5.4 Section 6 Policies, Outcomes for decision-making. Insert a new bullet point into Policy PA3 as follows:
- ‘PA3: *When considering the effects of urban development, decision-makers must:*
- *Recognise and provide for the contribution that urban development will make to the ability for people and communities and future generations to provide for their social, economic and cultural wellbeing.*
 - *Provide sufficient development capacity, whilst maximising the positive effects of development, and minimising the adverse effects of development.*
 - *Have particular regard to the positive effects of urban development at a national, regional and district scale, as well as its local effects.*

- Have particular regard to the urban-rural interface and the potential effects of urban development on primary production and the ability of rural areas to produce and supply food.



5.5 Section 6 Policies, Evidence and monitoring to support decision making. Amend Policy PB3 as follows:

'PB3: In carrying out the assessments required under policy PB1, local authorities must estimate the sufficiency of development capacity provided by its plans and proposed and operative regional policy statements, having particular regard to:

- The cumulative effect of all zoning, objectives, policies, rules and overlays in plans, and the effect this will have on opportunities for development being taken up.
- The actual and likely availability of infrastructure.
- The current physical and commercial feasibility of development capacity.
- The likelihood of opportunities for development being taken up.
- The ability of primary production activities in rural areas to support urban growth.

and must estimate the additional development capacity needed if any of these factors indicate that the supply of development capacity is not likely to meet demand in the short, medium or long-term.'

5.6 Section 6 Policies, Evidence and monitoring to support decision making. Amend Policy PB4 as follows:

'PB4 In carrying out the assessments required under policy PB1, local authorities must consult with infrastructure providers, community and social housing providers, the property development sector, the primary production sector and any other stakeholders as they see fit.'

5.7 Section 6 Policies, Responsive planning. Amend Policy PD9 as follows:

'PD9: In developing this strategy, local authorities must:

- Be informed by the Housing Assessment and Business Land Assessment required under policy PB1;
- Take into account the views of infrastructure providers, land owners, the property development sector and any other stakeholders as they see fit; and
- Have particular regard to policy PA1.
- Have particular regard to policy PA3 and the urban-rural interface and the ability of rural areas to produce and supply food.

6.0 SUMMARY

In summary, PIANZ and EPFNZ generally support the content and direction of the Proposed National Policy Statement on Urban Development Capacity (the 'NPS'). However, the NPS needs to recognise issues created by the urban-rural interface and the ability of the primary production industry to support urban growth.

PIANZ and EPFNZ appreciates this opportunity to provide feedback and would welcome the opportunity to be involved in further consultation. Specifically, we request involvement and the opportunity to provide the Ministry with input into:

- Amendments to the objectives and policies contained in the NPS; and
- The development of a National Policy Statement on Primary Production Capacity.

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Yours faithfully
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