

7 October 2019

Ministry for the Environment
PO Box 10362
WELLINGTON 6143

Via email to: npsurbandevelopment@mfe.govt.nz

Dear Sir/Madam

Re: Proposed National Policy Statement on Urban Development

Please find attached a submission on the proposed Ministry for the Environment National Policy Statement on Urban Development.

Please do not hesitate to contact me if you require any further information on this submission.

Yours sincerely



Sarah Cameron
Senior Policy Analyst

TO: Ministry for the Environment

SUBMISSION ON: Proposed National Policy Statement for Urban Development (NPS-UD)

NAME: NZ Kiwifruit Growers Inc (NZKGI)

ADDRESS: PO Box 4246, Mount Maunganui South 3149

1. Background to NZKGI

NZKGI was formed in 1993 to give kiwifruit growers their own organisation to develop a secure and stable kiwifruit industry. NZKGI represents 2,800 kiwifruit growers and gives growers their own voice in industry and government decision making. NZKGI works to advocate, protect and enhance the commercial and political interests of New Zealand kiwifruit growers.

2. The kiwifruit industry in New Zealand

The kiwifruit industry is a major contributor to regional New Zealand returning \$1.8b directly to rural communities in 2018/19. There are 2800 growers with 14,000ha of orchards with 7700ha green and 6300ha gold. The industry has 10,000 permanent employees and up to 25,000 jobs during the peak season. Approximately 80% of New Zealand's kiwifruit crop is grown in the Bay of Plenty.

3. General comments

NZKGI generally supports the objectives set out in the NPSUD however has provided the following comments:

- i. Global sales of kiwifruit are expected to grow from \$2 billion (2016/17) season to \$4.5 billion by 2025. This means an additional ~ 3000ha of land will be required. Allowing for urban expansion must not come at the expense of highly productive soils for food production. This will result in the reduction of land for food growing purposes and irreversible loss of that land for food production
- ii. Providing higher density living in greenfield areas should be first considered under the Policy Statement for Highly Productive Soils which proposes to protect highly productive land from inappropriate subdivision, use and development
- iii. The merging of rural and residential environments brings impacts through reverse sensitivity. While the kiwifruit industry has a tightly controlled quality assurance programme (including pest control) that ensures risks to neighbouring residential properties are low, growers still face significant disruption to the management of their orchards. Allowing development to occur in an ad-hoc manner makes reverse sensitivity difficult to manage
- iv. Objectives, policies and rules within urban zones should look to avoid or mitigate reverse sensitivity effects on land zoned rural including setbacks within urban zones where they are adjacent to rural zones. This includes requirements for buffer strips,

with landscaping standards, at the time of subdivision for new urban developments that border rural zones

- v. NZKGI supports the proposed requirement for all district plans in major urban centres to include zone descriptions for each zone that describe the expected types and nature of development that is intended within that zone and agrees the requirement of a plan change when potential development does not meet the achieved outcomes in the zone description
- vi. While NZKGI agrees that public transport options reduce congestion and emissions, this mode of travel is not always practical. The majority of kiwifruit orchards are in rural environments with minimal public transport. The industry is reliant on roading to shift fruit to ports, for workers to get to jobs and other industry related transport requirements. It is essential that main transport routes to ports, like State Highway 2 in the Bay of Plenty are safe, upgraded where necessary and fit for purpose
- vii. The National Policy Statement Freshwater Management sets out provisions on minimising stream diversion and culverting. This is contrary to the NPS-UD which loosens rules about culverting streams to promote urban growth

4. Further discussion

NZKGI welcomes further discussion with MfE on the proposed changes to the NPS - UD.