

SUBMISSION ON National Policy Statement for Infrastructure

25 July 2025

To: Ministry for the Environment

Name of Submitter: Horticulture New Zealand

Supported by: Hawke's Bay Vegetable Growers Association,
NZ Apples & Pears, NZ Tamarillo Growers Association,
Pukekohe Vegetable Growers Association, Vegetables NZ

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Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for the Environment for the opportunity to submit on Package 1: Infrastructure and development and welcomes any opportunity to continue to work with the Ministry for the Environment and to discuss our submission.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

HortNZ's Role

Background to HortNZ

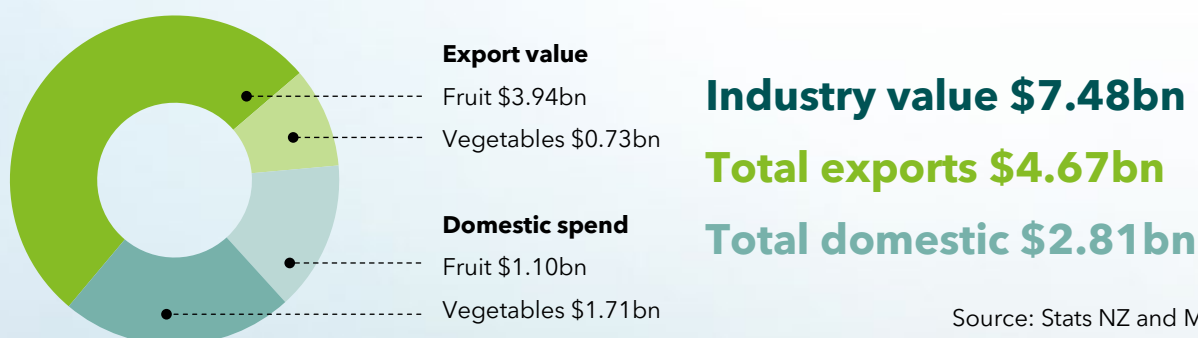
HortNZ represents the interests of approximately 4,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

There are approximately 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain, and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.



Executive Summary

National direction for infrastructure

HortNZ is concerned that the proposed National Policy Statement for Infrastructure (NPS-I) creates as risk for the ongoing productivity of the rural production zone by elevating sensitive activities (schools and hospitals) to the definition of infrastructure. Should the NPS-I apply to those activities, consideration is needed for the reverse sensitivity effects imposed by schools and hospitals on other land uses. Giving sensitive activities priority to locate without regard for spatial planning is likely to impose reverse sensitivity effects which constrain productive activities on highly productive land and in the rural production zone more generally.

HortNZ's first preference is that policies are added or amended in the NPS-I to manage the potential effects of social infrastructure on the productive use of highly productive land and in the rural production zone as a whole. In the table at the back of this submission, HortNZ proposes several amendments to the NPS-I to manage this potential land use conflict. HortNZ seeks these amendments or alternative relief are adopted before the NPS-I is gazetted.

If these amendments are not made, HortNZ seeks that social infrastructure is removed from the definition of 'additional infrastructure' to avoid these potential unintended consequences.

In addition, HortNZ considers that the importance of infrastructure (in the sense of the definition under the RMA) for our domestic food supply chain should be recognised. Roads, ports, and other forms of infrastructure all facilitate the production and distribution of food to support the well-being of communities, particularly in times of adverse events. As such, HortNZ seeks amendment to proposed Policy 1 to recognise that infrastructure should provide "sufficient development capacity to meet demand for housing, **food** and business land".

HortNZ also seeks that **flood protection** and **water storage** are added to the definition of 'additional infrastructure' given its importance for natural hazard resilience and climate change adaptation.

Submission

1. Horticulture and infrastructure

HortNZ supports a concerted effort by the Government to invest in infrastructure that supports economic growth, energy efficiency, climate resilience, and positive environmental outcomes. Fruit and vegetable growers rely on infrastructure to produce, process and transport the fresh produce that ends up on supermarket shelves in New Zealand and overseas. In particular, the horticulture supply chain relies on:

- Roads - to transport produce to domestic markets or to ports, for staff commutes, and to move machinery

The road network can be a major bottleneck for produce which is perishable and needs to make it to market in constrained timeframes. Road closures can mean the difference between a product arriving fresh to market or not at all. Roads are critical infrastructure in the case of natural hazard events. Vulnerabilities in the roading network can prevent the movement of food around the country when it is needed most to feed communities - in times of disaster.

- Ports - to transport produce to overseas markets

Doubling export value will see an increase in export volume. This means a higher volume of boats, and thus a need for bigger ports to handle the traffic. This is also a consideration for low emissions shipping.

As the "food miles" conversation becomes more prevalent, New Zealand will be at a disadvantage in its trade due to distance, unless we can access lower emissions ways of transporting product. In order for low emissions shipping alternatives to be accessible to New Zealand suppliers, the Government needs to invest in building bigger ports that can handle the larger, low-emissions vessels.

The frequency and reliability of domestic coastal shipping is also important. Produce from smaller growing regions may be shipped to larger ports for packing - for instance, apples from Canterbury may be shipped to Nelson or Hawke's Bay for export.

- Electricity infrastructure - for fruit and vegetable processing, farm equipment, greenhouse heating

A major constraint for the decarbonisation of horticulture is the ability to connect to electricity infrastructure with sufficient capacity. Especially for growers in the South Island, electrification would require huge investments in electricity infrastructure upgrades. Electricity companies are asking for cost-prohibitive capital contributions from customers to join the grid, and rural electricity users already face several power cuts per year without the additional load.

- Water storage - for irrigation, frost protection and wash water

On- and off-line storage is critical for the resilience of fruit and vegetable production and our industry's future growth, which is discussed further in HortNZ's water storage submission (part of this same suite of consultation).

- Flood management - to protect horticultural assets such as packhouses, workers' accommodation, greenhouses, crop support structures and artificial crop protection structures

Horticulture often locates in flood plains due to the high soil fertility in these areas. Flood protection should be considered for valuable horticulture assets given the regional and national economic importance of these activities. This includes buildings and structures that are part of primary production like artificial crop protection structures and packhouses, as well as ancillary buildings such as sheds for equipment and storage of hazardous substances.

- Infrastructure which supports the food supply chain itself - for New Zealand's domestic food security and resilience to natural hazards

The recent review of the Emergency Management Bill is also reflecting on the definitions of infrastructure, essential infrastructure, lifeline utilities and essential services. We seek alignment between this national policy statement and the Emergency Management Legislation. In the Emergency Management Bill, the importance of infrastructure is related to the degree to which it supports an essential service. The supply food is an essential service because food is an essential human need, alongside air, water, shelter, sleep and clothing.¹

HortNZ views the roads, ports and ferries that connect the domestic food supply chain as critical infrastructure of high importance during adverse events. Access to food in the wake of an earthquake, cyclone, or other major event will rely on networks of infrastructure. Elevating the importance of infrastructure connecting the domestic food supply chain aligns with the Government's consideration that infrastructure "is now recognised as a complex network of interconnected elements with a public-good purpose".²

2. Effects of reverse sensitivity on horticulture

The proposed NPS-I drafting includes schools and hospitals under the definition of 'infrastructure'. These sensitive activities have the potential to constrain primary production. This is of particular concern for horticulture on highly productive land, which tends to occur at the boundary of urban and rural areas and for primary production in the rural production zone more generally. This approach risks undermining the intent of the National Policy Statement for Highly Productive Land (NPS-HPL), which seeks to avoid the inappropriate location of sensitive activities on or adjacent to highly productive land.

If a school locates next to an orchard or vegetable farm, parents and teachers will naturally be concerned about the potential for spray drift from the use of agrichemicals. They may also be concerned about noise from the use of normal horticultural equipment, like audible bird scaring devices, which are critical to a well-functioning horticultural business in particular environments. Occupants of schools and new residential activities have been

¹ West, Mary. [Maslow's hierarchy of needs pyramid: Uses and criticism](#). 20 June 2025.

² MfE. [Package 1: Infrastructure and development](#). May 2025. (p. 12)

known to complain about the traffic movements of rural vehicles like tractors and heavy freight for transporting produce - even the dirt on the road moved by these vehicles.

Growers, like most people, have a natural desire to be good neighbours and may feel pressure to change their normal horticultural activities to meet the expectations of schools or hospitals which have located in an inappropriate zone. This social pressure may force growers to constrain their activities. The concern is when that constraint goes beyond existing accepted regulatory requirements, like spray plans, which are already developed to consider the well-being of people and the environment. Artificial social constraints impede on the ability of growers to exercise their property rights, grow local food for New Zealanders or grow valuable crops for export. This consequence must be considered before the NPS-I is gazetted.

3. Proposed National Policy Statement for Infrastructure

HortNZ supports the proposal to introduce national direction for infrastructure. We agree that consistent definitions and an objective clarifying the infrastructure outcomes expected under the resource management system will support council decision-making. HortNZ has observed that local councils struggle to make decisions that balance national benefit with local effects,³ which is true for infrastructure as well as domestic food production.

Q. 1 Is the scope of the proposed NPS-I adequate?

While HortNZ recognises the importance of social infrastructure, we are concerned that the proposed NPS-I drafting will give hospitals and schools, which are sensitive activities, locational priority in inappropriate environments, creating significant reverse sensitivity effects for lawfully established activities. These sensitive activities are more appropriately located in residential or commercial zones, not rural production zones.

For example, proposed Policy 4, which directs councils to recognise infrastructure providers' preferred locations, risks enabling health and education facilities in unsuitable areas without weighing the impact on surrounding land uses or whether those facilities have a functional need to locate in the rural environment.

HortNZ agrees that the scope of the NPS-I should include all infrastructure under the RMA definition that does not already have associated national direction. HortNZ supports that the NPS-I does not apply to electricity infrastructure, which has its own national direction. Under the future Planning Act, it may be more logical to bring national direction for electricity under the NPS-I to reduce the total number of national direction instruments.

³ NZIER. 2024. [Making the case for vegetable production in New Zealand](#). A report for Horticulture New Zealand.

3.1. Sensitive activities

HortNZ is concerned about the inclusion of schools and hospitals in the definition of 'additional infrastructure', which is then included in the definition of 'infrastructure' under the proposed NPS-I drafting. Schools and hospitals are sensitive activities which should not be given locational priority in rural or industrial zones unless there is a functional need for them to locate there. There is a serious risk this will constrain the ability of land users to exercise their property rights to use their land for its highest and best use in appropriate zones if sensitive activities locate in proximity to their land without buffers or alternative mitigations for reverse sensitivity.

We support providing for these activities but seek amendments that recognise their status as sensitive activities. If amendments are not made to mitigate the reverse sensitivity effects imposed by additional infrastructure on highly productive land and existing activities, we seek that schools and hospitals are removed from the definition of 'additional infrastructure'.

The NPS-I wording appears to shift the responsibility for managing land use conflicts with hospitals and schools onto other activities, which is incompatible with the National Policy Statement for Highly Productive Land (NPS-HPL). The following policies of the NPS-HPL are of particular relevance:

Policy 4: The use of highly productive land for land-based primary production is prioritised and supported.

Policy 8: Highly productive land is protected from inappropriate use and development.

Policy 9: Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land.

The NPS-HPL currently provides an exemption under clause 3.9 allowing *specified* infrastructure with a *functional or operational need* to locate on highly productive land to do so, as well as defence facilities.

The NPS-I definition of infrastructure is broader than the definition of specified infrastructure in the NPS-HPL. HortNZ's interpretation is that social infrastructure under the NPS-I would only be able to develop on highly productive land if it was regionally or nationally important, which could include a hospital. Other activities considered part of urban development could meet the policy criteria in the NPS-HPL if part of urban rezoning. However, with the proposed removal of LUC 3 from the definition of highly productive land, the remaining highly productive land will be at greater risk from reverse sensitivity from activities that occur on the boundary with highly productive land.

In our submission on the NPS-HPL, we propose a buffer or other mitigation to manage the interface between highly productive land and adjacent activities. This requirement would apply to sensitive activities such as schools and hospitals on the boundary of highly productive land. We seek similar provision in the NPS-I to manage the interface between

sensitive social infrastructure and highly productive land, which must be protected for present and future generations.

3.2. Flood protection and water storage

HortNZ seeks that **flood protection** and **water storage** are included in the definition of 'additional infrastructure'. The benefits of infrastructure provided for under proposed Policy 1 are also benefits of flood protection and water storage, including providing for the well-being of future generations, providing services that are essential to support human life and development, mitigating the effects of climate change and reducing risks from, and improving resilience to, natural hazards and climate change.

Proposed wording for the inclusion of flood protection is borrowed from the NPS-HPL definition of specified infrastructure:

any public flood control, flood protection, or drainage works carried out:

- i. by or on behalf of a local authority, including works carried out for the purposes set out in section 133 of the Soil Conservation and Rivers Control Act 1941; or
- ii. for the purpose of drainage, by drainage districts under the Land Drainage Act 1908

Community-scale water storage should be included in the NPS-I. While small-scale, on-farm water storage is given some recognition under the proposed NES Off-stream Water Storage out for consultation, community-scale collective water storage requires long-term planning and investment, similar to the other types of infrastructure covered by the NPS-I.

Q. 3 Does the proposed objective reflect the outcomes sought for infrastructure?

HortNZ supports the proposed objective. We see that the fruit and vegetable supply chain fits within the objectives to support the wellbeing of people and communities, provide national, regional or local benefits, and support the development of urban and rural environments to meet the changing needs of present and future generations.

Q. 4 Does the proposed policy adequately reflect the benefits that infrastructure provides?

HortNZ supports the benefits included in the proposed policy and seeks recognition of **food production** as part of development capacity. As the Government plans for infrastructure to support population and housing growth, infrastructure to support domestic food production must also be planned to meet growing demand. With the Government aiming to double export value by leveraging primary industries, integrating food production into infrastructure planning will be beneficial.

Supportive infrastructure for food production and distribution is essential to national resilience and social stability during times of disruption. In the event of natural hazards like cyclones and slips, or global events such as pandemics or geopolitical instability, New Zealand's domestic food supply chain becomes more important than ever. These events can interrupt the movement of food both into and out of affected regions. During these events, it is essential that people in the disaster area can get food, but also that the supply of food

to the wider population is not adversely affected. For instance, the inability to move fresh vegetables out of Gisborne when the motorway was blocked by slips from Cyclone Gabrielle affected the cost of groceries throughout the country.

Prioritising the restoration of infrastructure that supports food growing, processing and particularly distribution should be a core part of infrastructure planning. A reliable food system is essential for national wellbeing and security.

HortNZ seeks the following amendment to proposed Policy 1:

1. Planning decisions about infrastructure shall recognise and provide for the benefits of infrastructure, which includes all of the following:

- a) providing for the well-being of **present and** future generations;
- b) creating, supporting and enhancing well-functioning urban and rural environments, including providing for infrastructure necessary to provide sufficient development capacity to meet demand for housing, **food** and business land...

Q. 5 Does the proposed policy sufficiently provide for the operational and functional needs for infrastructure to be located in particular environments?

This NPS-I expands the definition of infrastructure to include sensitive activities such as schools and hospitals. Allowing these sensitive activities to proliferate without planning could result in their establishment in entirely unsuitable areas, such as working rural environments, where they will cause reverse sensitivity effects.

HortNZ opposes provision for sensitive activities to locate without advance planning. As such, HortNZ seeks that Policy 2 subpart (e) is either struck or limited only to infrastructure that is not a sensitive activity as follows:

1. Planning decisions must recognise and provide for the operational need or functional need of infrastructure to operate in, be located in, or traverse particular environments, including to...

~~(e) locate where the services are required, whether or not the infrastructure has been spatially identified in advance.~~

Alternative relief could include introducing a new policy which recognises the sensitive nature of 'additional infrastructure' and requires consideration of the reverse sensitivity effects it may create on lawfully established activities.

PX: Planning decisions must recognise the sensitivity of additional infrastructure and avoid, where practicable, reverse sensitivity effects on lawfully established activities and highly productive land. On or adjacent to rural production zones, infrastructure that is a sensitive activity must maintain a 30-metre internal setback or equally effective mitigation and implement all practicable measures to avoid reverse sensitivity effects on neighbouring activities.

Q. 6 Do you support the proposed requirement for decision-makers to have regard to spatial plans and strategic plans for infrastructure?

Yes, HortNZ supports this alignment with the future RMA replacement system.

Q. 7 Would the proposed policy help improve the efficient and timely delivery of infrastructure?

Yes, HortNZ supports this policy.

Q. 8 Does the proposed policy adequately provide for the consideration of Māori interests in infrastructure?

HortNZ supports the consideration of Māori interests in infrastructure.

Q. 9 Do the proposed policies sufficiently provide nationally consistent direction on assessing and managing the adverse effects of infrastructure?

No. Given the expanded definition of infrastructure to include sensitive activities such as schools and hospitals, the national policy statement needs to address the potential for reverse sensitivity effects caused by this “additional infrastructure”.

This policy statement needs to be integrated with the NPS-HPL, which requires that “Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land” under Policy 9.⁴

The proposed NPS-I risks undermining planning best practice which recognises that sensitive activities such as schools and hospitals should not be located in environments incompatible with their operational needs. Rural productive areas are not appropriate locations for such activities. Growers should not be expected to alter lawful practices, such as their use of sprays, and generation of noise, traffic movements, etc., to meet the expectations of teachers, students or patients whose facilities are inappropriately established within or adjacent to rural production zones.

Q. 10 Do the proposed policies sufficiently provide for the interface between infrastructure and other activities including sensitive activities?

The expanded definition of infrastructure now includes sensitive activities such as schools and hospitals. This NPS does not resolve how reverse sensitivity effects from these sensitive activities on other types of infrastructure (roads, ports, wastewater management, etc.) will be managed.

⁴ MfE. [NPS HPL with 2024 Amendments](#). Accessed online 27/06/25.

4. NPS-I and NPS-HPL Analysis

HortNZ’s view is that the NPS-HPL will prevail over the NPS-I because only specified infrastructure can achieve an exemption under the NPS-HPL. That said, the NPS-I should be explicit that sensitive additional infrastructure should not locate on highly productive land. If it does, it needs a 30-metre internal buffer or equally effective mitigation to manage potential reverse sensitivity effects on primary production activities. An analysis of the NPS-HPL and its potential interactions with the proposed NPS-I is included below.

NPS-HPL provision	Commentary
<p>Interpretation</p> <p>specified infrastructure means any of the following:</p> <p>(a) infrastructure that delivers a service operated by a lifeline utility:</p> <p>(b) infrastructure that is recognised as regionally or nationally significant in a National Policy Statement, New Zealand Coastal Policy Statement, regional policy statement or regional plan:</p> <p>(c) any public flood control, flood protection, or drainage works carried out:</p> <p style="padding-left: 40px;">(i) by or on behalf of a local authority, including works carried out for the purposes set out in section 133 of the Soil Conservation and Rivers Control Act 1941; or</p> <p style="padding-left: 40px;">(ii) for the purpose of drainage, by drainage districts under the Land Drainage Act 1908</p>	<p>Any infrastructure recognised as regionally or nationally significant under the NPS-I will get exemptions under the NPS-HPL.</p>
<p>3.8 Avoiding subdivision of highly productive land</p> <p>(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...</p> <p>(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.</p>	<p>Providing for nationally or regionally significant infrastructure under the NPS-I would allow for subdivision of highly productive land under the NPS-HPL.</p>

NPS-HPL provision	Commentary
<p>3.8 Avoiding subdivision of highly productive land</p> <p>(2) Territorial authorities must take measures to ensure that any subdivision of highly productive land:</p> <p>(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</p> <p>(b) avoids if possible, or otherwise mitigates, any actual or potential reverse sensitivity effects on surrounding land-based primary production activities.</p>	<p>Potential loss of the availability and productive capacity of highly productive land caused by subdivision for specified infrastructure must be avoided or mitigated.</p> <p>Reverse sensitivity effects on primary production activities will have to be avoided or mitigated.</p>
<p>3.9 Protecting highly productive land from inappropriate use and development</p> <p>(2) A use or development of highly productive land is inappropriate except where at least one of the following applies to the use or development, and the measures in subclause (3) are applied...</p> <p>(j) it is associated with one of the following, and there is a functional or operational need for the use or development to be on the highly productive land:</p> <p>(i) the development, operation, or decommissioning of specified infrastructure, including (but not limited to) its construction, maintenance, upgrade, expansion, replacement, or removal...</p>	<p>Highly productive land can be developed for nationally or regionally significant infrastructure if it has a functional or operational need to locate on highly productive land.</p>
<p>3.9 Protecting highly productive land from inappropriate use and development</p> <p>(3) Territorial authorities must take measures to ensure that any use or development on highly productive land: (a) minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land in their district; and</p> <p>(b) avoids if possible, or otherwise mitigates, any actual or potential reverse sensitivity effects on land-based primary production activities from the use or development.</p>	<p>If specified infrastructure is developed on highly productive land, loss of HPL or its productive capacity must be minimised or mitigated.</p> <p>Reverse sensitivity effects on primary production must also be minimised or mitigated.</p>

Amendment Table on the National Policy Statement for Infrastructure

Without limiting the generality of the above, HortNZ seeks the following decisions on the National Policy Statement for Infrastructure, as set out below, or alternative amendments to address the substance of the concerns raised in this submission and any consequential amendments required to address the concerns raised in this submission.

Additions are indicated by bolded underline, and deletions by strikethrough text.

Provision	Support/ oppose	Reason	Decision sought
D1 Definition of additional infrastructure	Oppose	<p>The proposed definition, which is included in the definition of infrastructure, includes sensitive activities (schools and hospitals). HortNZ is concerned about the potential effects of prioritising these activities under the NPS-I where they could impose reverse sensitivity effects on primary production activities such as horticulture. Stronger policy is needed to locate these activities in <i>appropriate</i> locations, which will not impose on normal rural businesses in the rural environment.</p> <p>HortNZ's first preference is that the potential reverse sensitivity effects from schools or hospitals on or adjacent to highly productive land are managed through policy direction. If that relief is not granted, HortNZ seeks that schools and hospitals are removed from the definition of 'additional infrastructure'.</p> <p>HortNZ seeks that flood protection and water storage are considered infrastructure</p>	<p>D1 Additional infrastructure:</p> <p>a) a relevant school or institution as defined in the Education and Training Act 2020;</p> <p>b) a hospital care institution within the meaning of section 58(4) of the Health and Disability Services (Safety) Act 2001;</p> <p>c) fire and emergency services facilities;</p> <p>d) defence facilities operated by the New Zealand Defence Force to meet its obligations under the Defence Act 1990;</p> <p>e) correction facilities operated by the Department of Corrections to meet its obligations under the Corrections Act 2004;</p> <p>f) a stormwater network; and</p> <p>g) district or regional resource recovery or waste disposal facilities</p> <p><u>x) any public flood control, flood protection, or drainage works carried out:</u></p>

Provision	Support/ oppose	Reason	Decision sought
		under the NPS-I given their national and regional benefits for resilience from natural hazards and climate adaptation. The proposed wording for flood protection comes from the NPS-HPL.	<p><u>(i) by or on behalf of a local authority, including works carried out for the purposes set out in section 133 of the Soil Conservation and Rivers Control Act 1941;</u> <u>or</u> <u>(ii) for the purpose of drainage, by drainage districts under the Land Drainage Act 1908;</u> <u>and</u> <u>(xx) community-scale water storage.</u></p> <p>(or alternative relief to the same effect)</p>
D19 Sensitive activities	Support	<p>HortNZ supports that the proposed drafting recognises that some of the activities classified as “additional infrastructure” are also sensitive activities known to impose reverse sensitivity effects.</p> <p>HortNZ seeks further amendments to the NPS-I to manage these reverse sensitivity effects on primary production, not just other infrastructure.</p>	<p>D19 Sensitive activities:</p> <p>residential activity (including visitor accommodation and retirement accommodation), care facilities, childcare facilities, schools, hospitals, custodial or supervised accommodation where residents are detained on site, marae, or place of worship.</p>
P1 Providing for the benefits of infrastructure	Amendment sought	<p>Food production for domestic supply is needed for a lot of the same reasons other infrastructure is needed - providing for the well-being of present and future generations, providing services essential to support human life and development, and</p>	<p>1) Planning decisions about infrastructure shall recognise and provide for the benefits of infrastructure, which includes all of the following:</p> <p>a) providing for the well-being of present and future generations;</p> <p>b) creating, supporting and enhancing well-functioning urban and rural environments,</p>

Provision	Support/ oppose	Reason	Decision sought
		<p>reducing risks from climate change and natural hazards.</p> <p>Strategic consideration of how we produce food will also be a necessary part of New Zealand's transition to a low emissions economy. Reducing our reliance on food imports will both reduce our carbon footprint and increase our resilience to global supply chain shocks.</p>	<p>including providing for infrastructure necessary to provide sufficient development capacity to meet demand for housing, food and business land...</p>
P2 Operational need or functional need of infrastructure to be in particular environments	Amendment sought	<p>This NPS expands the definition of infrastructure to include sensitive activities such as schools, hospitals and correction facilities. Allowing these sensitive activities to proliferate without planning could result in their establishment in entirely unsuitable areas, such as working rural environments, where they will cause reverse sensitivity effects and consequences for the users of those activities.</p> <p>HortNZ opposes provision for sensitive activities to locate without advance planning.</p>	<p>1) Planning decisions must recognise and provide for the operational need or functional need of infrastructure to operate in, be located in, or traverse particular environments, including to...</p> <p>d) be accessible to enable all infrastructure activities to be undertaken effectively and efficiently; and</p> <p>e) locate where the services are required, whether or not the infrastructure has been spatially identified in advance.</p> <p>(or alternative relief that excludes infrastructure that is a sensitivity activity)</p>
New Policy PX The sensitive nature of 'additional infrastructure' is considered	New policy sought	<p>This NPS expands the definition of infrastructure to include sensitive activities such as schools, hospitals and correction facilities. Allowing these sensitive activities to proliferate without planning could result in their establishment in entirely unsuitable</p>	<p><u>PX: Planning decisions must recognise the sensitivity of additional infrastructure and avoid, where practicable, reverse sensitivity effects on lawfully established activities and highly productive land. On or adjacent to rural production zones, infrastructure that is a</u></p>

Provision	Support/ oppose	Reason	Decision sought
		<p>areas, such as working rural environments, where they will cause reverse sensitivity effects and consequences for the users of those activities.</p>	<p><u>sensitive activity must maintain a 30-metre internal setback or equally effective mitigation and implement all practicable measures to avoid reverse sensitivity effects on neighbouring activities.</u></p>
<p>P6 Assessing and managing the effects of proposed infrastructure activities on the environment</p>	<p>Support with amendment</p>	<p>It is important to manage reverse sensitivity effects imposed by infrastructure (particularly sensitive activities classes as infrastructure under this NPS) on other lawfully established activities like primary production on highly productive land. This clause will support decision makers in weighing the NPS-I with the NPS-HPL.</p>	<p>1) When assessing and managing the effects of proposed infrastructure activities on the environment, decision-makers must:</p> <ul style="list-style-type: none"> a) have regard to the extent to which adverse effects have been avoided, remedied, mitigated or minimised (as applicable) through the route, site, design and construction method selection... d) adopt relevant international, national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and e) consider the financial and timing implications of mitigation measures and consent conditions to ensure these are proportionate and cost-effective; and <u>f) for additional infrastructure, have regard to the extent to which reverse sensitivity effects on lawfully established activities have been avoided.</u>

Provision	Support/ oppose	Reason	Decision sought
P9 Planning for and managing the interface and compatibility of infrastructure with other activities (1)	Support with amendment	P9 (1) needs to be stronger to recognise that some locations are far more appropriate than others to locate the sensitive activities included in the definition of 'additional infrastructure'.	<p>1) Planning decisions must manage the interface between existing, consented and planned infrastructure and other activities to ensure:</p> <p>a) infrastructure and other activities are as compatible as practicable;</p> <p><u>x) additional infrastructure does not impose reverse sensitivity effects on lawfully established activities or highly productive land;</u></p> <p>b) the safe, efficient and effective operation, maintenance and upgrade of existing, consented or planned infrastructure is not compromised by the adverse effects of other activities; and</p> <p>c) the co-location of compatible infrastructure activities while also recognising that some types of infrastructure are not compatible.</p>
P9 (2)	Support with amendment	<p>Social infrastructure can be sensitive to the effects of lawfully established activities. Particularly on highly productive land, this is a significant constraint on lawfully established existing activities that are prioritised under the NPS-HPL, such as fruit and vegetable production.</p> <p>Social infrastructure should only be located in appropriate zones where it does not impose reverse sensitivity effects on primary production.</p>	<p>2) In order to implement clause 1), local authorities must:</p> <p>a) engage with infrastructure providers to:</p> <ul style="list-style-type: none"> i. understand their existing, consented and planned infrastructure activities and medium to long-terms plans; ii. identify appropriate buffers and other methods to protect existing, consented and planned infrastructure (<u>excluding sensitive additional infrastructure</u>) from the adverse

Provision	Support/ oppose	Reason	Decision sought
			<p>effects of sensitive and incompatible activities, including direct effects, reverse sensitivity effects, and risks to health and safety;</p> <p>iii. support the strategic integration of infrastructure with land use activities;</p> <p>b) identify:</p> <p>i. activities that are particularly sensitive to the effects of infrastructure;</p> <p>ii. activities that are compatible with infrastructure, or potentially compatible with appropriate buffers, design standards or mitigation measures;</p> <p>iii. infrastructure activities, such as social infrastructure, that are sensitive to the effects of other infrastructure, <u>other existing, lawfully established activities, or existing or potential primary production on highly productive land;</u></p> <p>c) apply a range of methods, including, where appropriate:</p> <p>i. the use of buffers in plans to manage sensitive and incompatible activities near infrastructure;</p> <p><u>x. the use of internal setbacks in plans or equally effective mitigations to manage</u></p>

Provision	Support/ oppose	Reason	Decision sought
			<p><u>the reverse sensitivity effects caused by sensitive additional infrastructure, particularly on or adjacent to highly productive land;</u></p> <p>ii. design standards to manage the effects of infrastructure on other activities;</p> <p><u>iii. locating additional infrastructure only in compatible zones...</u></p>
<p>P10 Assessing and managing the interface between infrastructure and other activities</p>	<p>Support</p>	<p>HortNZ supports a policy to manage the interface between infrastructure and other activities. This is important to manage reverse sensitivity effects imposed by infrastructure (particularly sensitive activities classes as infrastructure under this NPS) on other lawfully established activities like primary production.</p>	<p>1) When assessing and managing the interface between existing, consented and planned infrastructure with other activities, planning decisions must:</p> <p>a) recognise that noise, vibration, dust and visual effects are all typical effects associated with infrastructure activities that can be managed where practicable but not completely avoided; and</p> <p>b) recognise that:</p> <ul style="list-style-type: none"> i. amenity values change due to a range of factors; ii. changes in amenity from infrastructure activities are necessary to achieve well-functioning urban and rural environments; <p><u>x) recognise that additional infrastructure are sensitive activities which are prone to impose</u></p>

Provision	Support/ oppose	Reason	Decision sought
			<p><u>reverse sensitivity effects on lawfully established activities;</u> and</p> <p>c) apply the general principle that the primary responsibility for managing adverse effects is on the new activity (including infrastructure) while allowing for flexibility for site- and project-specific circumstances.</p>