

SUBMISSION ON

Going for Housing Growth: Pillar One

15 August 2025

To: Ministry for the Environment

Name of Submitter: Horticulture New Zealand

Supported by: Vegetables New Zealand, New Zealand
Kiwifruit Growers Incorporated, Tamarillos New Zealand.

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OVERVIEW

Submission structure

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Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for the Environment (MfE) for the opportunity to submit on the Going for Housing Growth, Pillar One: Freeing up land for urban development, including removing unnecessary planning barriers. HortNZ welcomes any opportunity to continue to work with MfE and to discuss our submission.

The details of HortNZ's submission are set out below.

HortNZ's Role

Background to HortNZ

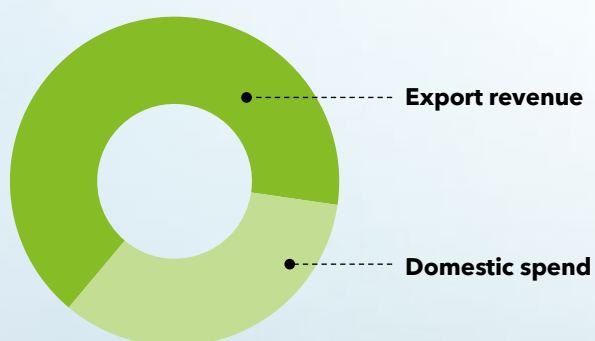
HortNZ represents the interests of approximately 4,300 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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.



Industry value \$7.54bn
Farmgate value \$4.89bn
Export revenue \$4.99bn
Domestic spend \$2.55bn

Source: HortNZ Annual Report 2025

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

Housing growth and goods and services, like production of fruit and vegetables, needed to support growing communities, go hand in hand. Housing growth policy needs to consider affordable and efficient access to these goods and services, alongside access to suitable housing options.

Access to fresh and affordable fruit and vegetables is critical to community health outcomes, ensuring New Zealand has year-round food security, and enabling robust & enduring food supply networks across the country. Production of fresh and affordable fruit and vegetables requires access to suitable land, which is expected to come under greater pressure for development due to population growth. With a growing population, also comes a need to secure continued access to fresh and affordable fruit and vegetables.

Housing policy can enable secure and consistent access to fresh and affordable fruit and vegetables through protection of highly productive land (HPL) and consistent planning standards for zones and activity types. Refer to HortNZ's submission on the National Policy Statement for Highly Productive Land¹ for our views on this important and related policy topic.

Overall, HortNZ recognises the need to provide for housing growth, providing protections are in place for HPL and to avoid reverse sensitivity impacts from housing development on primary producers. HortNZ also acknowledges the importance of suitable and consistent planning standards and good industry management practices to ensure growing operations are managed appropriately.

¹ [HortNZ Submission on the National Policy Statement for Highly Productive Land](#). 25 July 2025.

Submission

1. Horticulture and housing growth

Horticultural growing areas are sited in specific locations due to factors such as soil fertility, climate, topography, access to water, access to processing facilities and proximity to markets. Based on these factors, suitable locations are limited, and these operations are often associated with significant investment in infrastructure. Therefore, it is important to maintain the ability to grow in these suitable areas, without unnecessary constraints.

Horticulture is often located on the urban-rural fringe, on reasonably flat land, where greenfield developments tend to occur. Growers therefore tend to feel the reverse sensitivity effects of greenfield developments acutely.

Reverse sensitivity is a significant issue in areas where there are housing pressures and encroachment of new housing developments into areas adjacent or near to horticultural operations. Residents of new developments may not appreciate the nature of productive working landscapes. For example, noise and light effects associated with normal but critical horticultural tools such as bird scarers and frost fans, as well as machinery and vehicle movements. This can result in complaints which require council resources to resolve and can cause considerable stress for growers. It may also result in additional costs and delays for horticultural operators seeking to renew consents for such activities.

The challenge is to enable housing growth whilst also enabling continued horticultural production.

2. Linking protection of highly productive land

HortNZ has submitted on the government's National Policy Statement for Highly Productive Land (NPSHPL). Specifically, to remove Land Use Class 3 from the current provisions protecting LUC Classes 1,2 and 3 land from development. Refer to the HortNZ submission for its position on the removal of HPL 3, as this policy is strongly interconnected with housing growth policy.

The protection of HPL is important for various reasons including providing fresh affordable food to New Zealanders, building regional economic resilience, and meeting export growth and climate change targets.

The HortNZ [submission](#) on HPL highlights the need to enable the productive use of HPL, otherwise the HPL protections will not achieve the desired result. Housing growth has the potential to impinge on the use of HPL through reverse sensitivity effects from new housing developments. Reverse sensitivity remains a significant constraint on horticultural operations.

Planning rules that require buffers between residential and production land can reduce conflicts between incompatible land uses². It is important that mechanisms such as conditions on new development are provided for, e.g.: buffers, acoustic insulation. Buffers can include natural separation like rivers and topography (a cliff face adequately separates neighbours without the need for a large horizontal buffer). They can also include roads, shelterbelts, biodiversity plantings or simply 30 metres of space. Alternative mitigations, such as shelterbelts, can also be effective, recognising that shelter may not be appropriate where it shades and limits growth of adjacent crops.

Reverse sensitivity should also be managed through policies that recognise the importance of primary production activities within the rural zones, including the ability to generate noise, and light, as well as discharge to air and water.

In the past, HortNZ understands that councils lobbied Central Government for the removal of more directive requirements to manage reverse sensitivity. HortNZ is concerned that without direction for a buffer or alternative mitigations with the onus on new developers, councils will manage reverse sensitivity by imposing consent conditions on primary production. This would be counter to the purpose of other important central government policy, namely the NPS-HPL, to enable primary production on highly productive land.

The Expert Advisory Group's report on the RM3 planning system suggests that those who 'come to the nuisance' will not be able to complain about existing activities.³ While the Planning Act may be able to prevent legal complaints, social complaints will continue and pose an ongoing risk to the social license to operate for fruit and vegetable growers. If a grower gets blasted on social media for the normal noise associated with their business, that could be as restrictive as a neighbour's complaint to the council. Administrative barriers like the requirement to notify neighbours when agrichemicals are sprayed will continue. Spray notifications are accepted, but with increased numbers of neighbours, they will become more administratively burdensome. That is the reason why mitigations for reverse sensitivity will still be needed in the NPS-HPL, even once RM3 is implemented.

² Deloitte. New Zealand's Food Story: The Pukekohe Hub. Prepared for Horticulture New Zealand. August 2018.

³ Report from the Expert Advisory Group on Resource Management Reform. Blueprint for resource management reform: A better planning and resource management system 2025. Accessed 21/07/25.

3. Discussion questions

This section responds directly to the discussion questions posed in the consultation document.

Q. 1 What does the new resource management system need to do to enable good housing and urban development outcomes?

Good housing and urban development outcomes should include improved access to housing, as well as enabling access to goods and services needed to support these communities, such as access to affordable, healthy food.

Horticultural land is often sited near to concentrated populations due to access to transportation routes, processing facilities and markets. Closer proximity to markets allows food producers to keep transport costs down, and to maintain business profitability.

The new resource management system will need to consider how supporting industries such as horticulture, can be provided for in proposals to increase housing capacity. The NPSHPL currently under consultation, will be an important component of the new system. The interrelationship between national, regional and district-scale planning mechanisms will also be important. Secondly, increased housing capacity may increase tensions between land uses at interfaces of those land uses. The new system needs to consider how these tensions can be minimised.

Q. 2 Future development strategies and spatial planning
How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?

Spatial planning needs to consider the resources needed to support population and housing growth. As above, it needs to consider efficiency in primary producer access to markets.

Spatial planning needs to also consider land suitability and scarcity of suitable land for food production. Where use of scarce productive land is in competition with use of land for housing, policy interventions may be required to encourage continued use of this land for productive purposes. Once land is developed, it is permanently unavailable for future food production.

Lastly, spatial planning needs to consider multiple land uses and potential tensions between these land uses due to population sprawl or urban intensification. Tools such as buffers or setbacks between potentially conflicting land uses to avoid reverse sensitivity issues will be important. Nationally consistent planning standards will provide investment certainty for both food producers and housing developers.

Q. 3 Housing growth targets
Do you support the proposed high-level design of the housing growth targets? Why or why not?

HortNZ does not hold a position on housing growth targets. We seek that the above matters in response to earlier questions are provided for when considering the location of housing growth adjacent to existing horticultural production activities.

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| Q. 4 | Providing an agile land release mechanism |
| Q. 5 | 4. How can the new resource management system better enable a streamlined release of land previously identified as suitable for urban development or a greater intensity of development? |
| Q. 6 | |
| | Determining housing growth targets |
| | 5. Do you agree with the proposed methodology for how housing growth targets are calculated and applied across councils? Are there other methods that might be more appropriate for determining Housing Growth Targets? |
| | 6. How should feasibility be defined in the new system? If based on profitability, should feasibility modelling be able to allow for changing costs and/or prices? |

HortNZ does not hold a position on agile land release mechanisms for land previously identified as suitable for urban development or a greater intensity of development or housing growth targets, providing the above matters in response to earlier questions are provided for.

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| Q. 7 | Calculating development capacity |
| Q. 8 | 7. How should feasibility be defined in the new system? |
| Q. 9 | |
| Q. 10 | |
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| | 8. If the design of feasibility is based on profitability, should feasibility modelling be able to allow for changing costs or prices or both? |
| | 9. Do you agree with the proposal to replace the current 'reasonably expected to be realised' test with a higher-level requirement for capacity to be 'realistic'? |
| | 10. What aspects of capacity assessments would benefit from greater prescription and consistency? |

HortNZ does not hold a position on calculating development capacity, providing the above matters in response to earlier questions are provided for.

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| Q. 11 | Infrastructure requirements |
| Q. 12 | 11. Should councils be able to use the growth projection they consider to be most likely for assessing whether there is sufficient infrastructure-ready capacity? |
| Q. 13 | |
| | 12. How can we balance the need to set minimum levels of quality for demonstrating infrastructure capacity with the flexibility required to ensure they are implementable by all applicable councils? |
| | 13. What level of detail should be required when assessing whether capacity is infrastructure-ready? For instance, should this be limited to plant equipment (e.g. treatment plants, pumping stations) and trunk mains/key roads, or should it also include local pipes and roads? |

HortNZ does not hold a position on infrastructure requirements, providing the above matters in response to earlier questions are provided for.

Q. 14 Responding to price efficiency indicators

14. Do you agree with the proposed requirement for council planning decisions to be responsive to price efficiency indicators?

HortNZ does not hold a position on price efficiency indicators, providing the above matters in response to earlier questions are provided for.

Q. 15 Business land requirements

Do you agree that councils should be required to provide enough development capacity for business land to meet 30 years of demand?

Fruit & vegetable production includes facilities needed to wash, process and package fruit and vegetables after harvest. Provision for business land should include provision for post-harvest requirements of the fresh produce supply chain.

Planning could include incentives for desired industry, such as reduced or nil development contributions, such as provided for under the Christchurch City Council policy. Zealandia nurseries chose to locate within the Christchurch City Bounds due to the incentivising nature of the CCC development contribution policy. This meant Zealandia was able to locate near to local markets and to transport hubs to supply growers around the South Island.

Q. 16 Responsive planning

Q. 17 16. Are mechanisms needed in the new resource management system to ensure councils are responsive to unanticipated or out-of-sequence developments? If so, how should these be designed?

17. How should any responsiveness requirements in the new system incorporate the direction for 'growth to pay for growth'?

Unanticipated or out-of-sequence developments need to be designed to anticipate and manage the protection of highly productive land and reverse sensitivity.

Q. 18 Rural-urban boundaries

Q. 19 18. Do you agree with the proposal that the new resource management system is clear that councils are not able to include a policy, objective or rule that sets an urban limit or a rural-urban boundary line in their planning documents for the purposes of urban containment? If not, how should the system best give effect to Cabinet direction to not have rural-urban boundary lines in plans?

Q. 20 19. Do you agree that the future resource management system should prohibit any provisions in spatial or regulatory plans that would prevent leapfrogging? If not, why not?

20. What role could spatial planning play in better enabling urban expansion?

HortNZ supports housing intensification as an alternative to urban sprawl, where this enables the protection of highly productive and usable land.

Leapfrogging has the potential to cause fragmentation of highly productive land, which can result in exacerbation of reverse sensitivity issues as well as impacting on the ability to use fragmented land as an economic farming or growing unit. Impacts of leapfrogging on use of HPL need to be considered.

HortNZ supports the use of appropriate buffers between potentially conflicting land uses to avoid any potential conflict. Buffers can be built into zone rule design, as conditions of land development.

Intensification

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| Q. 21 | Key public transport corridors |
| Q. 22 | 21. Do you agree with the proposed definitions for the two categories of 'key public transport corridors'? If not, why not? |
| Q. 23 | 22. Do you agree with the intensification provisions applying to each category? If not, what should the requirements be? 23. Do you agree with councils being responsible for determining which corridors meet the definition of each of these categories? |

HortNZ does not hold a position on definitions for key transport corridors, providing the above matters in response to earlier questions are provided for.

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| Q. 24 | Intensification catchments sizes Do you support Option 1, Option 2 or something else? Why? |
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HortNZ does not hold a position on definitions for intensification catchments sizes, providing the above matters in response to earlier questions are provided for.

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| Q. 25 | Minimum building heights to be enabled |
| Q. 26 | 25. What are the key barriers to the delivery of four-to-six storey developments at present? |
| Q. 27 | 26. For areas where councils are currently required to enable at least six storeys, should this be increased to more than six storeys? If so, what should it be increased to? Would this have a material impact on what is built? 27. For areas where councils are currently required to enable at least six storeys, what would be the costs and risks (if any) of requiring councils to enable more than six storeys? |

HortNZ does not hold a position on minimum building heights, providing the above matters in response to earlier questions are provided for.

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| Q. 28 | Offsetting the loss of development capacity |
| Q. 29 | 28. Is offsetting for the loss of capacity in directed intensification areas required in the new resource management system? 29. If offsetting is required, how should an equivalent area be determined? |

HortNZ does not hold a position on offsetting, providing the above matters in response to earlier questions are provided for.

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| Q. 30 | Intensification in other areas Is an equivalent to the NPS-UD's policy 3(d) (as originally scoped) needed in the new resource management system? If so, are any changes needed to the policy to make it easier to implement? |
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HortNZ does not hold a position on intensification in other areas, providing the above matters in response to earlier questions are provided for.

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| Q. 31 | Enabling a mix of uses across urban environments |
| Q. 32 | 31. What controls need to be put in place to allow residential, commercial and community activities to take place in proximity to each other without significant negative externalities? 32. What areas should be required to use zones that enable a wide mix of uses? |

Land used for the production of fruit and vegetables can be located near other land uses, and can include land used for growing, washing, processing and packaging facilities and retail operations for sale of fruit and vegetables.

Controls for managing potentially conflicting land uses should include controls on developed land (e.g. buffers), building design (e.g.: acoustic insulation) – refer to Section 2 for more detail. Other land uses should also be subject to nationally consistent standards to require them to operate in a manner appropriate to the zone they are located in. Operating constraints should be based on industry good management practice, which allows for adoption of novel solutions as technology evolves.

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| Q. 33 | Minimum floor area and balcony requirements Which rules under the current system do you consider would either not meet the definition of an externality or have a disproportionate impact on development feasibility? |
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HortNZ does not hold a position on minimum floor area or balcony requirements.

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| Q. 34 | Targeting of proposals Do you consider changes should be made to the current approach on how requirements are targeted? If so, what changes do you consider should be made? |
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HortNZ does not hold a position on targeting of proposals.

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| Q. 35 | Impacts of proposals on Māori Do you have any feedback on how the Going for Housing Growth proposals could impact on Māori? |
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HortNZ does not hold a position on how the Going for Housing Growth proposals could impact on Māori.

Other Matters

Q. 36 Do you have any other feedback on Going for Housing Growth proposals and how they should be reflected in the new resource management system?

HortNZ is optimistic about the potential for spatial planning under the future Planning Act to provide decision-makers with the tools to strategically plan for different land uses. HortNZ's vision is that enabling food production to thrive on the best, most versatile soils can be compatible with allowing for all types of housing growth if spatial planning is used to locate these priorities appropriately.

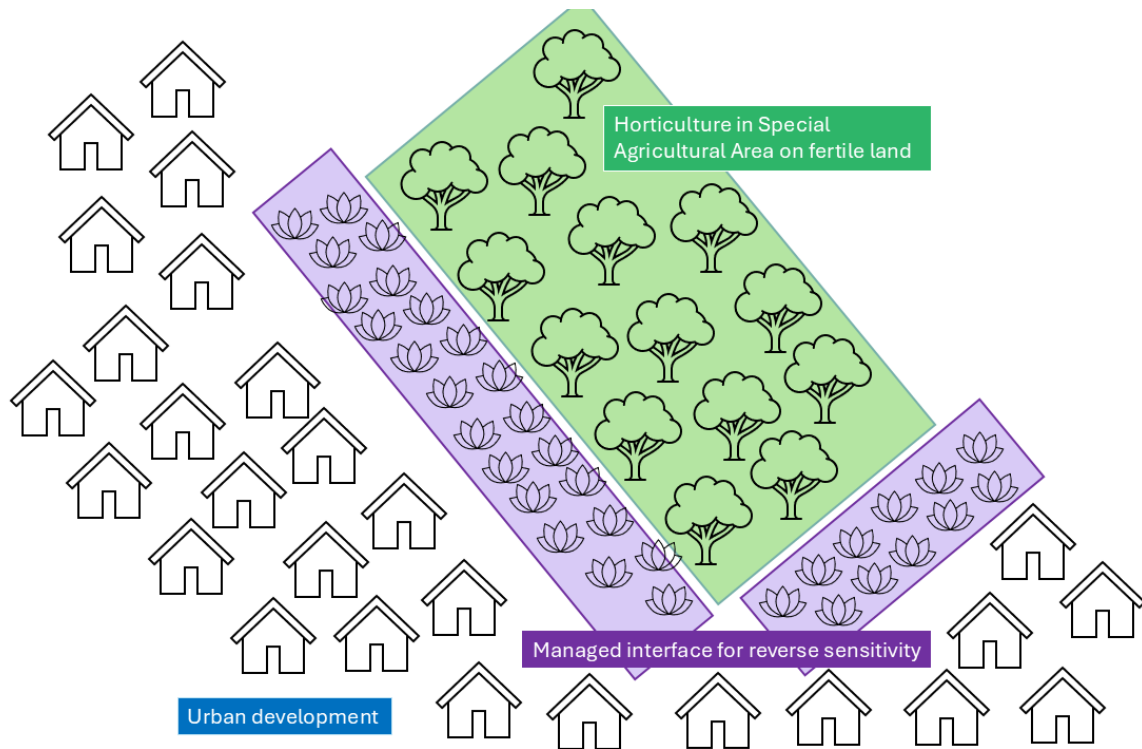
The Government's recent consultation on amendments to the NPS-HPL opened the possibility of Special Agricultural Areas (SAA's). SAAs are places where highly productive land is protected because of a particular value for fruit and vegetable production. HortNZ imagines that through spatial planning, a network of SAA's would be mapped based on nuanced criteria that look at local context and identify truly highly productive food producing land. A network of SAA's would provide regional resilience to our national food production system. They will protect the future productive economy and support our national goal to double export value.

Urban development and subdivision for lifestyle blocks would not be allowed within SAA's, and that would free up lots of land outside of SAA's where urban expansion could take place. This would provide for both values – making excellent use of our limited natural resources for growing high-value food for export and domestic food supply while providing for housing outside of those targeted areas. SAA's could be one of the limited national zones where provisions are in place to manage potential reverse sensitivity effects and the interface with new housing at the edge of the SAA is carefully managed.

HortNZ supports the designation of the Heretaunga Plains only as an interim SAA at this stage. Please refer to HortNZ's [submission](#) on the National Policy Statement for Highly Productive Land (NPSHPL) for further detail on this position.

Horticultural production is just one aspect of the wider fresh produce domestic supply chains. As critical as horticultural production elements are, Aotearoa New Zealand cannot deliver those fruits & vegetables into our kitchens without also having a strong & secure food supply chain that enables consistent year-round packing, transport, storage, distribution, and retail systems.

Any NPSHPL needs to recognise Aotearoa New Zealand's food supply chains in order to not unintentionally cause significant disruptions to food supply, or price increases.



Transitioning to Phase 3

- Q. 37. Should Tier 1 and 2 councils be required to prepare or review their HBA and FDS in accordance with current NPS-UD requirements ahead of 2027 long-term plans? Why or why not?

HortNZ does not hold a position.