

SUBMISSION ON Illustrative National Policy Direction

16 October 2026

To: Ministry for Cities, Environment, Regions & Transport

Name of Submitter: Horticulture New Zealand

Supported by: New Zealand Apples and Pears Inc., Summerfruit New Zealand, New Zealand Vegetable Council, Pukekohe Vegetable Growers Association, Hawke's Bay Fruit Growers' Association, Strawberry Growers New Zealand, New Zealand Tamarillo Growers Association Inc.

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OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Executive Summary
- 3 Part 3: Submission

Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for Cities, Environment, Regions & Transport (MCERT) for the opportunity to submit on the illustrative National Policy Direction and welcomes any opportunity to continue to work with MCERT 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

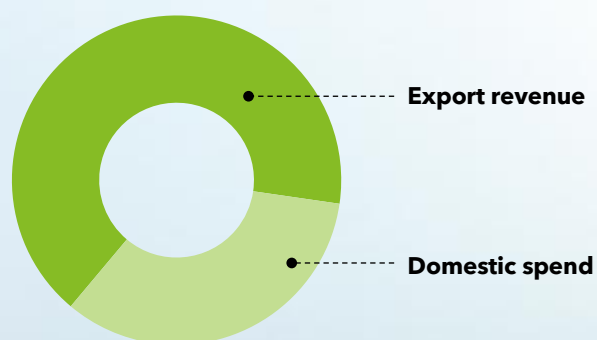
HortNZ represents the interests of approximately 4,300 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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 \$9.25bn

Farmgate value \$5.30bn

Export revenue \$6.70bn

Domestic spend \$2.55bn

Source: HortNZ Annual Report 2026

Executive Summary

The illustrative National Policy Direction (NPD) represents a significant step forward for horticulture by providing clearer national direction on the resource management issues that are critical to the sector's productivity, resilience and growth. HortNZ strongly supports the recognition of horticulture as a stand-alone sub-theme within Theme 3 and its importance to New Zealand's low emissions economy and domestic food supply. We also support the protection of high value growing areas, a reverse sensitivity cross-cutting theme, enabling direction for water storage and access, and the increased focus on nationally consistent and proportionate regulation.

HortNZ broadly supports the direction taken in the illustrative NPD to enable horticulture to establish, adapt and develop over time. Horticulture is unique in the breadth of crops and production systems it encompasses, resulting in a diverse set of operational requirements and infrastructure needs.

This submission focuses on several targeted improvements to strengthen that direction and provide greater certainty about how horticulture can be truly enabled in the new planning system. HortNZ seeks that horticulture's broad public benefits are recognised in the policy intent. This requires direction to enable its strategic future growth and that activities that provide a national public benefit like commercial vegetable production (CVP) are provided for when setting environmental limits and action plans.

HortNZ supports the new resource management system's greater reliance on the NPD, national standards and nationally consistent plan provisions to reduce duplication and unnecessary regional inconsistency. Where conflicts or trade-offs between NPD directives and outcomes can be anticipated, the NPD should provide direction on how and at what stage in the system 'funnel' decisions on these conflicts and trade-offs are to be made. Important conflicts and trade-offs need to be addressed at the national level for the system to remain efficient and effective.

The illustrative NPD also introduces several new terms. HortNZ recommends that further clarity on new terminology is needed to ensure the NPD can provide the necessary certainty within the system.

We note that while the Planning Act may be able to prevent legal complaints around reverse sensitivity, this is likely to remain a significant constraint on horticultural operations. Complaints associated with reverse sensitivity will continue and pose an ongoing risk to the social licence of fruit and vegetable growers, and HortNZ is seeking wording within the NPD to strengthen these protections now and into the future.

Submission

1. Horticulture in New Zealand

Horticulture is a diverse sector comprising a wide range of crop types and growing systems. From permanent orcharding crops like apples and kiwifruit to short-term rotational crops such as vegetables, each have distinct needs and operating contexts.

Horticultural production is typically seasonal and relies on a specific combination of factors including (but not limited to) soil, climate and freshwater resources available in certain locations. Production also relies on access to supporting infrastructure and transport networks that connect growing areas with packhouses, processors, ports and markets.

Access to freshwater is critical to horticultural production. Growers carefully manage water and other inputs to produce marketable yields and meet market specifications, with production systems often dependent on the availability of reliable water supplies and suitable natural resources.

As urban areas expand into productive growing regions, reverse sensitivity issues can arise, creating tension between existing production activities and neighbouring land uses.

To successfully enable horticultural production and the array of benefits that come with it, it is critical that national policy settings enable the unique aspects of the horticulture sector that are often overlooked or not well understood.

1.1. Orcharding

Orcharding involves a seasonal production cycle with growers requiring specialised skills, labour and inputs such as water at different times to support the stages of a growing cycle.¹

Trees and vines are in place for many years and the effects of water stress in one season can impact future crops.² It is important to understand the long-term nature of orcharding and how effects of stresses on trees and rootstock can affect the overall production of crops into the future.

As the effects of climate change become more pronounced, growers have adopted a range of innovations to maintain production and marketable yields. These include artificial crop protection structures, alternative growing and pruning systems such as two-dimensional (2D) canopy designs and increasing use of technology.

¹ Horticulture New Zealand (HortNZ), [Fresh fruit from freshwater](#) [2024]

² Horticulture New Zealand (HortNZ), [Fresh fruit from freshwater](#) [2024]

Orcharding also relies on a range of structures and established seasonal management practices such as frost fans, bird scarers (also used by vegetable growers) and artificial crop protection/support structures, which are a necessary and lawful aspect of production.

1.2. Commercial vegetable production

CVP is more dynamic, both spatially and temporally. Successful vegetable growing relies on crop rotation across different parcels of land to maintain soil health and manage pests and diseases.

In practice, growers have rotational planting forecast over several years. Planning successful rotations relies on having access to land, often through a mixture of leased and owned land, to ensure soil health and crop nutritional needs can be achieved. This requires confidence in resource management frameworks that provide sufficient flexibility to accommodate changing crop locations and needs over time. As rotations occur, the production requirements, inputs, and management activities move between sites.

Vegetables grown in New Zealand are primarily for domestic consumption, with 80% of what is produced being for the domestic market.³ Some locations enable the year-round production of vegetable crops such as Pukekohe, Horowhenua and Canterbury, and therefore play a significant role in ensuring there are fresh vegetables available through the winter period. Other areas such as Tasman, Hawke's Bay and Ohakune have microclimates that support larger growing hubs to ensure there is a consistent year-round supply of vegetables for our domestic needs.⁴

The dynamic nature of vegetable production has been difficult for regulators to capture and provide for in nutrient consenting frameworks. Traditionally, this has been done through use of tools or approaches developed for use in other primary sectors such as the use of Overseer, which does not translate across appropriately for activities such as vegetable production.⁵ This is evidenced through the recent Plan Change 1 (Waikato) and Plan Change 2 (Manawatū-Whanganui) processes which were litigated over several years. In the case of Plan Change 2, the Court stated that "there will need to be further changes to the One Plan to more appropriately accommodate commercial vegetable growing."⁶

2. Structure of the Illustrative NPD and visibility of how the new system could operate

HortNZ supports the thematic structure of the illustrative NPD. The approach provides a clearer picture of how the new system is intended to operate, improves visibility of how different topics and directives relate to one another.

³ New Zealand Institute of Economic Research, [Making the economic case for vegetable production in New Zealand](#) [2024]

⁴ NZIER, n at 3

⁵ Ministry for the Environment, [The Government response to the findings of the Overseer peer review report](#) [2021]

⁶ Horizons Regional Council, [Plan Change 2: Final Decision](#) [2026]

2.1. Resolving important conflicts and trade-offs at the national level

HortNZ considers that, where significant conflicts between national directives can be anticipated, the NPD should provide direction on how they are intended to work together. This may include identifying where one outcome has priority, or how multiple outcomes can be achieved together through appropriate location, design, mitigation or other methods. Where the appropriate response depends on local context, the NPD should clearly identify matters that decision-makers must consider in resolving trade-offs.

Some situations will inevitably arise where directives pull in different directions. In those circumstances, greater clarity is needed on how decision-makers are expected to manage the interaction between those directives, and on the role of national standards in balancing and implementing them.

For example, a river floodplain may contain some of New Zealand's most versatile soils and be defined as a high value growing area. The directives in sub-theme 2 direct decision-makers to enable the ongoing use of high value growing areas for food production. At the same time, the system-wide natural hazard directives require decision-makers to avoid increasing exposure to natural hazard risk or to reduce existing risk. If a grower wants to establish new infrastructure, worker accommodation, or water storage in a flood-prone area, there may be a need to reconcile both outcomes rather than simply determine that one directive takes precedence over the other.

While regional spatial plans are intended to identify where conflicts and trade-offs between NPD directives exist, identifying a conflict is different from providing direction on how it should be managed or resolved. If direction is not provided through the NPD, the same policy question may be revisited through regional spatial plans, land use and natural environment plans and consenting processes.

3. Horticulture as a stand-alone sub-theme

HortNZ strongly supports the explicit recognition of horticulture as its own sub-theme of primary production. This speaks to the unique needs and opportunities that it presents.

3.1. Recognising the benefits of horticulture

Horticulture is a high-value and relatively low-emissions land use that produces healthy food for New Zealanders and the world. Horticulture is the third largest primary industry sector, generating \$9.25 billion of value between the domestic and export markets, all on less than 0.1% of New Zealand's land area.⁷ The sector also supports regional communities, directly employing 40,000+ people.⁸ The continued growth of horticultural

⁷ HortNZ, [Annual Report to March](#) [2026]

⁸ HortNZ, [Jobs & Labour](#)

production, which is supported by the Aotearoa Horticulture Action Plan,⁹ is important for New Zealand's domestic food supply, public health, regional and national economies, and emission reduction targets.

HortNZ seeks that the benefits of horticulture are more clearly stated in the horticulture sub-theme's policy intent statement. The illustrative NPD recognises some of these benefits already including the importance of protecting food supply through high value growing areas.

The current policy intent statement focuses on the regulatory framework applying to horticulture, rather than the benefits that enabling horticulture is intended to deliver. There are many public benefits to horticulture, and effects can be well controlled. We seek a policy intent statement that recognises horticulture's contribution to communities and regional and national economies, and this flows through to the directives which require further recognition of the sector's benefits in decision-making.

Specific relief sought: recognise the benefits of horticulture in the sub-theme policy intent statement, and the need for strategic growth direction for horticulture (additions are in bold).

New Zealand's horticulture sector is enabled through a nationally consistent and proportionate regulatory framework that **recognises its contribution to domestic food supply, communities, regional and national economies and Māori economic development**, protects high value growing areas where appropriate, supports production, **growth** and innovation, and manages reverse sensitivity effects so horticultural activities can continue to operate, adapt and develop over time.

We also seek a strategic growth directive for horticulture to align with the proposed policy intent statement above, discussed in the following section.

3.2. Expansion and strategic growth of horticulture

We consider there is an opportunity to build on positive direction in the illustrative NPD to enable horticulture, by providing for its strategic future growth.

Strategic growth requires the planning system to consider where horticultural production can occur and the land, water and supporting infrastructure needed to enable it. Protecting today's footprint will not by itself achieve future outcomes of domestic food security, export growth, climate resilience or the productive use of scarce resources needed to grow.

Strategic growth opportunities can be identified through mapping high value growing areas. Mapping can recognise areas that are important for horticultural production today and consider areas that could be important for future production. Mapping would allow regional spatial plans to anticipate changes in population demand, climate, water

⁹ HortNZ, [Aotearoa Horticulture Action Plan](#) [2023]

availability, crop growing areas, and provide for horticulture's productive and assimilative capacity within environmental limits. This would support the development and expansion that is needed to underpin a nationally resilient and regionally diverse food production system.

The current drafting of the illustrative NPD provides a good foundation. HortNZ seeks a strengthening of the horticulture directives to make it clear that expansion is not only a matter of operational flexibility for individual businesses, but also part of providing for its future strategic growth. This strengthening could be achieved through consolidating and amending PP-Directive 2.1 and PP-Directive 2.2, or through a separate strategic growth directive.

Specific relief sought: strategic growth directive for horticulture (additions are in bold, deletions are struck through).

Option 1: Amend both PP-Directive 2.1 (note we suggest other amendments to this directive in section 4.1.1) and PP-Directive 2.2

PP-Directive 2.1:

To support the establishment, operation, maintenance, **expansion** and adaptation of horticulture, land use plans and natural environment plans must [in accordance with national standards]:

a) ensure that controls on **the establishment and expansion of** horticultural activities are proportionate to the significance of adverse effects **at the river catchment scale** and focused on managing those effects rather than restricting horticultural activities, except where necessary to achieve environmental limits, **and provide for the continued operation, maintenance, expansion and adaptation of lawfully established horticultural activities.**

~~b) provide for the continued operation, maintenance and adaptation of lawfully established horticultural activities, unless more restrictive controls are required to manage significant adverse effects or respond to a breach or likely breach of environmental limits~~

c) provide operational flexibility to support innovation, changing growing practices, crop rotation, species changes, expansion or redevelopment, and responses to market, climate, biosecurity, or environmental pressures.

PP-Directive 2.2:

- a) regional spatial plans must, using best available information, identify high value growing areas of regional or national significance **and opportunities and requirements for future horticultural growth**, and provide strategic direction on **the land, water and supporting infrastructure needed to enable horticultural production and future growth**, and how potential conflicts between those areas, urban development, and infrastructure will be managed over the long term.

Option 2: Create a separate strategic growth directive

PP-Directive 2.X: Building on the identification of high value growing areas, regional spatial plans must identify and provide for opportunities for the long-term growth of

horticulture, including the land, water and supporting infrastructure necessary to enable that growth.

We have suggested further amendments to this directive in section 5.2.1. in relation to the scale at which freshwater decisions are made.

The need for a strategic growth directive in the NPD is particularly relevant to CVP which depends on access to highly versatile land, often on the rural-urban fringe. With population growth increasing at around 0.7% (35,000-40,000 people) per year,¹⁰ planning for this growth is critical for New Zealand's domestic food security to meet current and future population needs for healthy food.

3.3. It is important that reverse sensitivity is well managed

HortNZ strongly supports the management of reverse sensitivity as a cross-cutting theme in the illustrative NPD. We seek that this is retained and that direction is carried through into national standards through appropriate setbacks, buffers and other mitigations.

HortNZ strongly supports lifting the bar for when councils need to investigate reverse sensitivity complaints where the complaining party has come to the nuisance. Reverse sensitivity provisions need to account for both existing reverse sensitivity complaints as well as issues arising from future complaints. We also seek clear direction for Councils to educate and manage expectations of newcomers to rural areas about the lawful activities that occur there.

We suggest this because reverse sensitivity remains a significant constraint on horticultural operations. While the Planning Act may be able to prevent legal complaints, non-legal complaints such as those made through social media platforms will continue and pose an ongoing risk to the social licence to operate for fruit and vegetable growers, particularly in a future where people continue to move to the rural fringes where horticulture production takes place. For this reason, the use of mitigations for reverse sensitivity will still be needed in specific national direction instruments.

PP-Directive 2.3, together with the proposed national standards for horticultural activities and supporting infrastructure, recognises the broader network of facilities and infrastructure required to support horticultural production. Combined with the reverse-sensitivity directives, these provisions are important to ensuring that the establishment, operation and expansion of horticulture can occur in practice.

We note that PP-Directive 1.6, which seeks to ensure primary production activities can continue operating and adapting without unreasonable constraint from reverse sensitivity effects, is limited to rural production zones. While most production occurs within these zones, packhouses, coolstores, processing facilities, distribution centres and associated

¹⁰ StatsNZ, [Population](#) [2026]

infrastructure are often located in industrial or specialised zones. HortNZ therefore seeks that these facilities receive equivalent protection from reverse sensitivity effects.

Specific relief sought: amend wording in PP-Directive 1.6 (amendments are in bold) to recognise that important activities in the horticultural supply chain are not limited to rural production zones.

"b) use a range of planning tools and methods to separate incompatible land uses in rural areas where practicable, including by:

i. directing rural lifestyle, rural settlements and sensitive or incompatible activities to appropriate locations

ii. limiting the establishment or intensification of incompatible activities ~~within rural production zones~~ **where primary production activities are occurring**, as necessary to protect **those primary production** activities from unreasonable constraint"

4. High value growing areas and enabling productive capacity

HortNZ strongly supports the recognition and protection of high value growing areas in the illustrative NPD and the move towards a broader set of factors to classify these areas.

Currently, New Zealand has around 80,000 hectares of land used for horticultural production.¹¹ This land is used for horticulture because of its unique soil versatility, climate suitability, access to water and proximity to existing infrastructure and supply chains. Protecting and enabling land use for horticulture supports the objective of the Aotearoa Horticulture Action Plan, developed by industry, Māori, research providers and government, to double farmgate value.¹² It also supports the ongoing availability of fresh fruits and vegetables at affordable prices for New Zealanders.

We agree that land use capability (LUC) classes are a blunt way of measuring the potential productivity of land. The versatility of land is reliant on biophysical criteria and the built environment, including soil type, topography, cohesion with other productive land, climate, access to water, ability to discharge, infrastructure, proximity to labour, and proximity to a concentration of similar activities to share ancillary infrastructure like packhouses. Not all these criteria are needed, but they can be considered in balance to identify areas that are truly highly productive. We also see that productive capacity of land includes whether someone can generate profit or food from working the land.

In our 2025 submission on Highly Productive Land,¹³ we supported clear criteria to identify Special Agricultural Areas (SAAs) through spatial planning under the RMA

¹¹ HortNZ, [Election Manifesto](#) [2026]

¹² HortNZ, [Aotearoa Horticulture Action Plan](#) [2023]

¹³ HortNZ, [Submission on Primary Sector: Highly Productive Land](#) [2025]

replacement system. The discussion on criteria for SAAs is still relevant to how high value growing areas could be mapped under the new system. We welcome the opportunity to work with the Government on the method for identifying and mapping high value growing areas.

HortNZ has a long-term vision of a network of high value growing areas based on nuanced criteria responsive to local context that provide regional resilience to our national food production system. A network of high value growing areas is needed to strengthen the resilience of New Zealand's food production systems to climate events and supply chain disruptions. When some regions experience large-scale natural hazard events that limit food production or cut off transport of goods, other regions need to be ready to supply food for national consumption.

Protecting high value growing areas must be paired with policy settings which prioritise and support their intended use. For example, a national direction to make vegetable growing and crop rotation a permitted activity is needed alongside protection of high value growing areas in vegetable growing areas. Fruit production also needs to be enabled through stringent management of reverse sensitivity effects, water for irrigation and support of the use of artificial crop protection structures, crop support structures, bird scaring devices and frost fans. Without access to reliable and timely supply of water and the ability to discharge contaminants, the productive potential of these areas may never be realised, effectively constraining the very land the planning system seeks to protect. This has manifested under the existing National Policy Statement on Highly Productive Land where some areas have constrained use for horticultural production and are also unable to be developed, for example, Plan Change 73 in Auckland.

One directive that we think needs clarification is PP-Directive 2.2(c), which states that *'existing lawfully established growing operations in areas identified as high value growing areas will be permitted, [in accordance with national standards], requiring good management practice, and a certified freshwater farm plan'*.

Fruit growing has not historically been subject to a national standard, nor has it required a certified freshwater farm plan to be permitted. We assume this to be a drafting error and the intent was for these provisions to apply to CVP, as such we have suggested amendments to this directive below. Unless corrected this could result in the assumedly unintended consequence of much more stringent rules applying to fruit growers.

Specific relief sought: amend wording in PP-Directive 2.2 (c) (amendments are in bold, deletions are struck through):

*'existing lawfully established growing operations in areas identified as high value growing areas will be permitted, [in accordance with national standards **requiring good management practice if applicable**], and **meet relevant** ~~certified~~ freshwater farm plan requirements .*

5. High value growing areas and freshwater quality

HortNZ supports the direction of the illustrative NPD towards a nationally consistent, proportionate and risk-based approach to managing the effects of primary production.

The use of national standards, freshwater farm plans and action plans provides an opportunity to achieve freshwater outcomes while enabling productive activities. The critical issue we see is ensuring these mechanisms work together, and that the national direction to enable horticulture where the effects are managed, is reflected in supporting objectives and policies in national freshwater instruments. This is particularly relevant to providing for CVP and crop rotation in freshwater decision-making and enabling community scale and collective water storage where water is used efficiently.

5.1. Nationally important activities and freshwater decision-making

Activities that provide a significant national public benefit and that have impacts on freshwater need to be accounted for in freshwater decision-making. Current instruments like the National Policy Statement for Freshwater Management 2020 (NPSFM)¹⁴ do not provide direction on how this is to be achieved.

Vegetable growing is the clearest example of this. CVP has national benefits and local effects, but the NPSFM did not explain how local limits should provide for those national benefits.

The illustrative NPD provides a much stronger foundation for resolving this issue than the current NPSFM. The next step is to ensure that this national direction is carried through into freshwater decision-making, so that activities like CVP are provided for when local environmental limits and action plans are designed.

Where an environmental limit is fixed and several activities compete for the remaining resource use capacity, it is not sufficiently clear how decisions are to be made about where and which nationally significant activities are to be provided for, and trade-offs are to be managed.

5.2. National direction for commercial vegetable growing

HortNZ strongly supports the clear direction in the illustrative NPD to enable CVP, including a national standard to permit existing CVP with a certified freshwater farm plan.

This recognition reflects the ongoing challenges that growers have experienced through Plan Change 1 in Waikato and Plan Change 2 in Horizons in particular, where inconsistent regional planning approaches have created uncertainty and constraints for CVP and crop rotation.

¹⁴ HortNZ, [Submission on Freshwater national direction - NPSFM 2025](#) [2025]

Without a nationally consistent planning framework to provide certainty for growers, vegetable production will be further constrained in future, with implications for the availability of fresh and affordable vegetables for New Zealanders and the health outcomes they support. HortNZ strongly supports this recognition and seeks that it is carried through to the final NPD package with the associated national standard and complementary freshwater management objectives.

5.2.1. MANAGING CVP EFFECTS WITHIN ENVIRONMENTAL LIMITS

We see high value growing areas as supportive of achieving freshwater outcomes if they allow a more integrated approach across freshwater farm plans and action plans within the NPSFM (or equivalent national instrument), together with long-term spatial planning under the Planning Act.

Horticulture is well placed to meet freshwater farm plan requirements, with the New Zealand Good Agricultural Practice (NZGAP) Environment Management System (EMS) module. The EMS has been updated based on new industry codes of practice. All growers using the EMS will be regularly certified and independently audited.

In 2025 there were 27,497 hectares of CVP land certified in the EMS,¹⁵ approximately 70% of all vegetable growing land in New Zealand. Growers have been adopting good management practices through the EMS since 2019 through ongoing extension programmes and industry support. Most recently, HortNZ's partnership with the Government to deliver the Growing Change programme, helped hundreds of (mostly) vegetable growers across New Zealand prepare freshwater farm plans using the EMS, covering 41,107 hectares of horticultural production.¹⁶ Growers are gearing up to adopt the new EMS starting in late 2026.

HortNZ's 2025 submission¹⁷ on the NPSFM sought both national rules for CVP and supporting national freshwater policy direction so that regional decision-makers have clear direction on how nationally important activities are provided for in freshwater decision-making. HortNZ sought that CVP and crop rotation be enabled and provided for when freshwater outcomes and limits are set, rather than relying only on activity status once those decisions have been made. This means providing sufficient assimilative capacity in resource use limits to support CVP because of its national public benefit to domestic food supply.

In our view, providing for CVP and its expansion does not require stricter limits to be applied to other land uses. For this to occur, the predicted increase in contaminant load from CVP expansion would need to exceed the predicted decrease in contaminant load resulting from the implementation of good management practice (GMP) across all land uses, such that freshwater objectives to "maintain", or in degraded catchments "improve",

¹⁵ Vegetables NZ Inc, [Annual Report](#) [2025]

¹⁶ HortNZ, [HortNZ marks successful end of Growing Change freshwater programme | Horticulture New Zealand – Ahumāra Kai Aotearoa](#) [2026]

¹⁷ [25.07.25 HortNZ-FINAL-submission-NPSFM-2025.pdf](#)

could not be achieved. Given the expansion of CVP is likely to be modest, this is unlikely. CVP expansion may use some of the headroom created through the adoption of GMP and in our view is not expected to drive additional restrictions on other land uses. In future natural environment plans it may be that freshwater limits are set that seek to reduce contaminant losses from activities other than vegetable growing that go beyond GMP level. If that occurs, it will be a result of the level of ambition and timeframe for achieving freshwater outcomes in those regional plans, not be driven by the contaminant load allocation required to provide for CVP to occur at GMP.

Farm-level risks can be managed through freshwater farm plans while cumulative effects are managed through environmental limits and action plans at the appropriate catchment scale.

The spatial scale at which freshwater effects are assessed is also important. HortNZ's 2025 NPSFM submission raised concerns about approaches that effectively manage discharge loads at property scale, without flexibility to manage effects at broader scales such as the freshwater management unit (FMU) or whole river. Smaller spatial scales can unnecessarily constrain crop rotation even where water quality evidence demonstrates negligible effects at the broader scale. HortNZ's position is that freshwater management should retain flexibility across river, FMU, catchment and sub-catchment scales. There needs to be flexibility in the scale at which freshwater is managed recognising that some outcomes are most effectively achieved at a broader scale than an individual tributary.

Specific relief sought: amend wording in PP-Directive 2.1 to specify the scale at which freshwater effects of horticulture are assessed (amendments are in bold). Note: we retained the suggested amendments outlined in Section 2.2 Expansion and strategic growth of horticulture in *italics*:

To support the establishment, operation, maintenance, *expansion* and adaptation of horticulture, land use plans and natural environment plans must [in accordance with national standards]:

a) ensure that controls on *the establishment and expansion* of horticultural activities **provide for the continued operation, maintenance, *expansion* and adaptation of lawfully established horticultural activities** and are proportionate to the significance of adverse effects **assessed at the river, freshwater management unit, catchment or sub-catchment scale** and focused on managing those effects rather than restricting horticultural activities, except where necessary to achieve environmental limits, *and provide for the continued operation, maintenance, expansion and adaptation of lawfully established horticultural activities*.

b) ~~provide for the continued operation, maintenance, *expansion* and adaptation of lawfully established horticultural activities, unless more restrictive controls are required to manage significant adverse effects or respond to a breach or likely breach of environmental limits~~

c) provide operational flexibility to support innovation, changing growing practices, crop rotation, species changes, expansion or redevelopment, and responses to market, climate, biosecurity, or environmental pressures.

Greater clarity is also needed around the concept "likely to be breached" as a trigger for more restrictive controls. It should be clear how a likely breach is determined, including the evidence relied on, relevant timeframe, and level of confidence required. An anticipated breach should not become an open-ended basis for restricting existing activities without a transparent and robust evidential basis, and a proportionate risk-based approach. In the absence of such certainty, HortNZ's preference is that the concept of "likely to be breached" is removed from the NPD altogether.

5.2.2. ROLE OF ACTION PLANS

HortNZ seeks clarification of how action plans are intended to operate under the NPD, including their relationship with environmental limits and regulatory methods.

HortNZ supports the use of action plans, including under PP-Directive 1.3. As set out in our 2025 NPSFM submission, action plans are a critical tool to drive improvements in water quality and water quantity. Non-regulatory action plans should be used to complement water use limits and water take limits.

We consider action plans are particularly important where a catchment is below a national bottom line and that bottom line is unlikely to be achieved through limits and the adoption of GMP by all activities alone. Where limits alone are not sufficient, action plans can provide a pathway for coordinated catchment-scale action, investment and environmental improvement over time, alongside spatial planning and limits.

Where complex decisions are needed about future land use, large-scale investment in water storage or catchment-scale mitigations, HortNZ supports an action plan approach that allows for longer-term decision-making and consideration of national, regional and local positive and adverse effects.

HortNZ also seeks that national standards for action plans require early and ongoing involvement of affected landowners and industry so that action plans are informed by the scale and nature of activities within the catchment and identify practical actions at the catchment scale not just the property scale capable of delivering freshwater improvement.

5.2.3. SOURCE WATER DRINKING PROTECTION ZONES AND REVERSE SENSITIVITY

PV-Directive 1.4 speaks to the protection of drinking water sources from contamination, through identifying and mapping source water risk management areas and controlling discharges and other activities that may affect registered drinking water suppliers.

In our 2022 submission on the National Environmental Standards for Sources of Human Drinking Water (NES-SHDW)¹⁸ we asked for a risk-based and effects-based approach rather than controls simply arising because land happened to fall within a source water

¹⁸ HortNZ, [Submission on improving the protection of drinking-water sources](#) [2022]

risk management area. HortNZ seeks that the same principle is reflected in PV-Directive 1.4.

Specific relief sought: amend wording in PV-Directive 1.4 (amendments are in bold) to require councils to take a proportionate risk approach.

"control discharges and other activities as needed **proportionate to the risk**".

HortNZ supports surface water risk management area mapping. However future drinking water national standards should distinguish between immediate/source-specific risks and diffuse or cumulative catchment risks, with the latter managed through catchment-scale mechanisms. In our 2022 submission we raised substantial concerns with Source Water Risk Management Area 3 as it covered the entire source catchment. We argued that diffuse contaminants and cumulative effects should generally be managed through catchment planning rather than individual resource consents.

We support the wording in the illustrative NPD that compliance with drinking water standards should be "after treatment", and support this wording being retained.

HortNZ seeks to clarify how the 100-person threshold will apply to seasonal or temporary population fluctuations like we see in horticulture. We are concerned that temporary seasonal exceedances may unintentionally trigger source water planning controls.

6. High value growing areas and freshwater quantity

6.1. Recognising community-scale and collective water storage

HortNZ seeks that recognition of water storage in the illustrative NPD be broadened to recognise water storage not only at the farm scale for individual use, but also at the community and collective scales, including the infrastructure needed to harvest, convey and distribute stored water.

Water storage can support diversification to and expansion of activities like horticulture to support New Zealand's transition to a low-emissions economy. Businesses can have the confidence to invest in a new horticultural development or expansion with the knowledge that they will have the water needed to grow. Access to water is often the main hurdle before a business diversifies or establishes itself in horticulture.

Community-scale storage is particularly important for horticulture. Orchards and market gardens tend to be small and located on the flat, highly productive land at the urban-rural fringe at the bottom of the catchment where there is limited space for significant on-farm storage. Strategic storage may therefore be better located elsewhere in a catchment and shared between users (across differing land uses) through natural conveyance, water races or other distribution infrastructure.

In our 2025 submission¹⁹ we sought that water storage be enabled to address water security as part of climate change resilience and to support social, environmental and economic outcomes. We specifically sought that “collective approaches are enabled to support the efficient and sustainable use of water at the FMU scale”.

Collective storage requires long-term planning and investment that cannot be achieved through a national standard for small-scale off-stream storage alone. These schemes will require millions of dollars of investment, which may require central or local government co-investment as well as planning support. HortNZ imagines that a combination of spatial planning within a framework of a 30-Year Infrastructure Plan could be used to prioritise community-scale water storage and the activities it could support.

HortNZ seeks the following amendments to the NPD.

Specific relief sought: amend wording in PP-Directive 1.4 to seek recognition in NPD for community-scale water storage (additions are in bold).

(a) **regional spatial plans must identify strategic opportunities for community-scale and/or collective water storage and associated distribution infrastructure that enables primary production, climate change resilience, efficient use of water, and economic and environmental benefits.**

(b) ~~(a)~~ natural environment plans must enable allocation of sustainably available water and require efficient water use

(c) ~~(b)~~ land use plans and natural environment plans must provide for the taking and storage of water during periods of high flow.

We also note that for PP-Directive 1.4 to be effective and to avoid uncertainty in future decision making, ‘sustainably available water’ will need to be clearly defined. HortNZ supports a definition which considers temporal availability, storage (of all scales) and distribution without creating an additional sustainability test beyond the existing environmental limits and allocation framework.

Specific relief sought: ‘sustainably available water’ be defined in the Interpretation section of the NPD (additions are in bold).

“Sustainably available water” means water that can be allocated within applicable environmental limits and whole of catchment allocation rules, taking account of temporal availability and the role of storage and distribution in matching water availability with demand.

¹⁹ HortNZ, [Submission on freshwater national direction - water storage](#) [2025]

6.2. Rootstock survival water - the multi-year effects on plant stress

Horticulture needs reliable access to water to prevent plant stress and ensure crops reach maturity in times of drought or when cease flow takes are reached. This is particularly important for permanent crops like apples, pears, avocados, kiwifruit and stonefruit, where establishing an orchard requires significant capital investment and several years before trees or vines produce a commercially viable crop. Young trees and vines need more reliable access to water to reach maturity.

There is a threshold at which trees and vines reach enough water stress that their productivity cannot bounce back in following years due to root die-back and reduced branching.²⁰ Growers therefore risk not only losing one season's crop but the ability of the orchard to bounce back the following year(s). As an example, rootstock loss resulting from drought could cost a kiwifruit grower \$150,000 to \$400,000 per hectare in reestablishment costs,²¹ plus 3-8 years of lost revenue before an orchard reaches maturity and is covering its annual growing costs again.^{22 23}

HortNZ has demonstrated through modelling that in several regions a relatively small volume of water is required (below cease take) for rootstock survival with a negligible impact on the flow regime.²⁴

HortNZ advocated for access to rootstock survival water to be recognised in the NEB.²⁵ Despite being a matter of critical importance to growers, access to rootstock survival water was not afforded protection through the primary legislation. We view this as an important gap that can be resolved through the NPD.

This also aligns with the system-wide natural hazard direction in the illustrative NPD. Drought is a recognised natural hazard in both the Natural Environment Act and the Planning Act, and providing for small volumes of rootstock survival water can reduce the risk of permanent orchard tree loss.

HortNZ considers that there is an opportunity to provide for rootstock survival water when designing community-scale and collective water storage options strategically through regional spatial plans. However, given the potentially significant financial implications of widespread tree death across multiple orchards without access to the necessary water to keep trees alive and productive, we also submit that access to rootstock survival water should be specifically recognised in PP-Directive 1.4.

²⁰ Khaembah EN, Gee M, Moore T, Brown H., [Rootstock survival for New Zealand orchards. A Plant & Food Research report prepared for HortNZ](#) [2023]

²¹ Tupu.nz, [Land Use Fact Sheet - Kiwifruit](#)

²² New Zealand Kiwifruit Growers Incorporated, [The Kiwifruit Book 2024](#) [2024]

²³ Otago Regional Council, [Otago's rural businesses and environmental actions for fresh water](#) [2023]

²⁴ Plant and Food Research, [Rootstock survival for New Zealand orchards](#) [2023]

²⁵ Horticulture New Zealand (HortNZ), [Submission on the Natural Environment Bill](#) [2026]

Specific relief sought: rootstock survival water is recognised and provided for in PP-Directive 1.4.

To support secure, reliable and resilient water supply for existing and future primary production, including stock drinking water and **rootstock survival water**:

- a) natural environment plans must enable allocation of sustainably available water and require efficient water use
- b) land use plans and natural environment plans must provide for the taking and storage of water during periods of higher flows.

6.3. Crop survival water

HortNZ submits that access to crop survival water should be considered in the development of freshwater and national food security strategies. Crop survival water is needed to avoid irreversible crop damage, loss, quality loss and yield reduction in short-rotation cropping systems during periods of water scarcity.

Unlike many other production systems, vegetable growing is characterised by short growing seasons and narrow harvest windows, and often limited opportunity to recover from water stress once critical growth thresholds have been exceeded. Crops cannot be moved or supplemented with alternatives to freshwater for their survival and growth.

The consequences of this extend beyond individual growers, and are felt by consumers, processors and retailers.²⁶ Lack of access to freshwater to support the production of vegetable crops for our domestic needs quickly becomes an issue of national food security if growers are unable to access water for irrigation of crops that support the food requirements of the domestic population.²⁷

Regional Plans offer some approaches in policies and rules regarding temporary water shortages which could be useful to explore. For example, the Auckland Unitary Plan recognises priority is given to takes for perishable food processing and takes for irrigating water sensitive crops for human consumption in times of temporary water shortage.²⁸

Water security strategies and enabling communities to create a combination of large-scale community storage, offline storage and other approaches such as managed aquifer recharge will ultimately provide a more reliable long-term solution.

²⁶ Food and Agriculture Organization of the United Nations, [Interview with Li Lifeng, Director of the Land and Water Division](#) [2023]

²⁷ Emily Levenson, [What Happens Between Farm and Fork – Characterising New Zealand’s Domestic Fruit and Vegetable Supply Chains](#) [2026]

²⁸ [Auckland Unitary Plan](#) [2026]

6.4. Post-harvest water needs

Post-harvest supply chain covers all the activities, such as handling, washing, cooling, packing, storage and processing of produce that occur after a crop is harvested and before it reaches the consumer. These activities rely on access to sufficient quantities of freshwater. HortNZ considers that the production of fresh produce for direct human consumption meets the ingestion test similar to that of drinking water. Therefore, the freshwater needed to grow, wash, and pack fresh produce also needs to be of a standard that is safe for human consumption.²⁹

While PP-Directive 2.3 requires land use plans to recognise and provide for post-harvest facilities and activities, HortNZ considers that this provision would be strengthened by expressly providing for timely access to sufficient fresh, high-quality water for these activities to maintain food safety standards, food freshness, and ensuring produce can be supplied to market.

Specific relief sought: amend wording in PP-Directive 2.3 (additions are in bold).

Land use plans must recognise and provide for post-harvest facilities and supporting activities, **including access to fresh, reliable and timely water required to support those facilities and activities**, that have a functional or operational relationship with horticultural production, including packhouses, cool stores, processing and storage facilities, freight and logistics activities, and associated infrastructure.

7. Infrastructure

HortNZ supports the approach taken in the illustrative NPD to enable infrastructure. Well-functioning infrastructure underpins primary production and strengthens the resilience of food supply chains and recovery through disruption events.

Some fresh produce supply chains can have five or more movements between the paddock and the end customer. Because fresh produce is highly perishable, infrastructure that connects the national food system and supply chain is critical to the production and distribution of food and should be recognised as a strategic infrastructure consideration.

HortNZ has noted in previous submissions that roads, ports, ferries and other transport connections are critical to moving fresh produce around New Zealand and become particularly important during and after natural disasters and adverse events when communities rely on resilient supply chains to access food.³⁰ In our infrastructure submission we sought alignment with the emergency-management framework.

²⁹ Leanne Roberts on behalf of HortNZ, [Statement of Evidence](#)

³⁰ HortNZ, [Submission on National Policy Statement for Infrastructure](#) [2025]

To better recognise the importance of infrastructure in primary production, HortNZ seeks that Directive 1.1 be amended to require regional spatial plans, when identifying strategic infrastructure priorities, to recognise infrastructure and transport connections critical to regional and national food production hubs and distribution centres, including their resilience during and after natural hazard events.

Specific relief sought: amend wording in INFR-Directive 1.1 (additions are in bold).

Spatial plans must identify the strategic infrastructure priorities that shape how the region grows and changes, **including infrastructure and transport connections critical to regional and national food production and distribution, and their resilience during and after disruption events.**

8. Natural hazards

We strongly support the primary production natural-hazard sub-theme under PP-Directive 5.1 that recognises the resilience of primary production is primarily managed through farm management, operational decisions, asset management and investment planning rather than through land use restrictions.

An area where the interaction between directives is less clear is workers' accommodation. The illustrative NPD says that rural areas should provide workers' accommodation that supports rural businesses, and at the same time apply a more stringent natural-hazard regime to housing and development. These differences need resolution so that housing hazard provisions do not inadvertently conflict with HD-Directive 3.1 for well-functioning rural areas.

Specific relief sought: additional paragraph in HD-Directive 4.1 (suggested amendments in bold):

HD Directive 4.1

To support housing and development in appropriate locations, land use plans must ensure natural hazard risks associated with housing and development are managed by:

- a) ...
- c) **Recognising the functional need for workers' accommodation to be located in rural production areas and enable it where natural hazard risk can be appropriately mitigated through location, design, evacuation planning or other measures.**