

SUBMISSION ON

Plan Changes 4C: Minor Improvements

5 May 2026

To: Whangarei District Council

Name of Submitter: Horticulture New Zealand

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Our submission

Horticulture New Zealand (HortNZ) thanks Whangarei District Council for the opportunity to submit on Plan Change 4C and welcomes any opportunity to continue to work with Whangarei District Council and to discuss our submission.

HortNZ could not gain an advantage in trade competition through this submission.

HortNZ wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

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

HortNZ's Role

Background to HortNZ

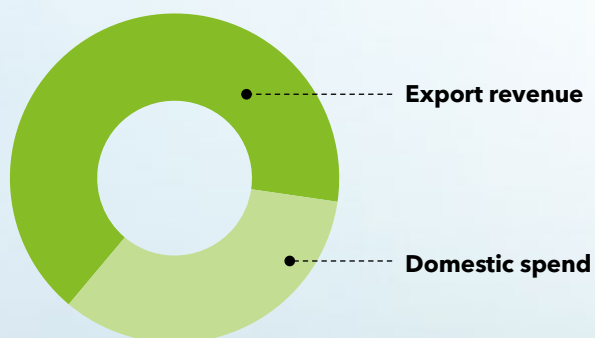
HortNZ represents the interests of approximately 4,300 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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 \$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.



Submission

1. Horticulture in Whangarei

There are more than 4,781 hectares of horticultural activity within the Northland region,¹ approximately 1500 hectares of which are within the Whangarei District. The main crops are avocados; however, other crops, including kiwifruit, tamarillos, leafy green vegetables, citrus fruit, onions, berries and passionfruit, are also grown.

Horticulture in Whangarei is unique in that productivity of land is not necessarily hindered by lot size. HortNZ's evidence to the 2017 hearings on the Proposed Whangarei District Plan detailed the types, sizes, productivity and financial viability of avocado and kiwifruit orchards in the district.² It is clear that horticultural operations are capable of being economically viable on lots of 2-3ha.

2. Proposed Plan Change 4C - Minor Improvements

Proposed Plan Change 4C (PC 4C) introduces amendments across 15 issue areas. Of most interest to the horticulture sector are changes to provisions for commercial activities and visitor accommodation in rural zones.

In the Operative Plan, the definition of "Commercial Activity" is "any activity trading in goods, equipment or services. It includes any ancillary activity to the commercial activity (for example administrative or head offices)". By HortNZ's interpretation, roadside retail of fresh fruits and vegetables would be considered a commercial activity under the plan. Roadside produce retail is an appropriate and anticipated activity in the rural zones, ancillary to horticulture.

When it comes to visitor's accommodation, HortNZ's primary concern is reverse sensitivity in the rural zones. The expectations of those undertaking or enjoying residential visitor accommodation that might have looked to leverage from a perception of rural character and amenity, might be quite different from the reality of a working production zone. 'Airbnb' or 'Book-a-Bach' visitors, may have different amenity expectations of the rural environment than those of existing residents that might otherwise accept primary production as part of the character and amenity of this environment.

¹ [Fresh Facts 2025](#)

² Statement of Evidence by Jerome Hardy for Horticulture New Zealand, 29 June 2017

Submission on Plan Change 4C

Without limiting the generality of the above, HortNZ seeks the following decisions on Plan Changes 4A and 4C, 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
RPOZ-R10, RLZ-R12, FUZ-R11 Commercial Activities	Amendment sought	Roadside produce retail would fall under the definition of Commercial Activities. Roadside retail is an anticipated part of horticultural activities in rural zones. The grower, who would be the principal operator, does not always live on the same site as their orchard or market garden. Thus, HortNZ seeks removal of the requirement that the principal operator of a commercial activity live on site.	RPROZ-R10 Commercial Activities Activity Status: Permitted <ol style="list-style-type: none"> The principal operator of the activity lives on the site for at least 183 days out of every 365-day period; and The activity does not include, before 08:00 or after 18:00 on any day, the operation of machinery, receiving customers or the loading or unloading of vehicles; and The activity generates less than 20 traffic movements per site, per day; and In addition to the principal operator, the activity has no more than two other persons engaged in providing the activity; and The activity does not exceed the use of 15% of the total gross floor area of all buildings on the site. Activity Status when compliance not achieved: Discretionary

Provision	Support/oppose	Reason	Decision sought
RPROZ-R12 Visitor Accommodation	Amendment sought	<p>HortNZ supports a permitted activity for visitor accommodation limited to 6 people. However, there are some reverse sensitivity concerns in rural environments.</p> <p>Therefore, HortNZ seeks an appropriate 10m setback from the boundary to manage these effects. That is the same setback applied to buildings in the RLZ and FUZ zones.</p>	<p>RPROZ-R12 Visitor Accommodation Activity Status: Permitted</p> <p>Where: 1. The activity is undertaken in an existing lawfully established residential unit provided the maximum visitor occupancy, in addition to any permanent residents on the site, is no more than six tariff-paid visitors at any given time; and</p> <p><u>2. The activity is setback 10 m from the property boundary.</u></p> <p>OR</p> <p>2. The principal operator of the activity lives on the site for at least 183 days out of every 365-day period; and</p> <p>3. The activity does not include, before 08:00 or after 18:00 on any day, the operation of machinery, receiving customers (except visitors checking into accommodation) or the loading or unloading of vehicles; and</p> <p>4. The activity generates less than 20 traffic movements per site, per day; and</p> <p>5. In addition to the principal operator, the activity has no more than two other persons engaged in providing the activity; and</p> <p>6. The activity does not exceed the use of 15% of the total gross floor area of all buildings on the site; and</p>

Provision	Support/ oppose	Reason	Decision sought
			<p><u>7. The activity is setback 10 m from the property boundary.</u></p> <p>Activity Status when compliance not achieved: Discretionary</p>