

# **SUBMISSION ON**

## Plan Change B: General Residential

28 July 2025

**To:** Manawatu District Council

**Name of Submitter:** Horticulture New Zealand

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# OVERVIEW

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## Our submission

Horticulture New Zealand (HortNZ) thanks the Manawatu District Council for the opportunity to submit on Plan Change B and welcomes any opportunity to continue to work with council to discuss our 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.

HortNZ could not gain an advantage in trade competition through this 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

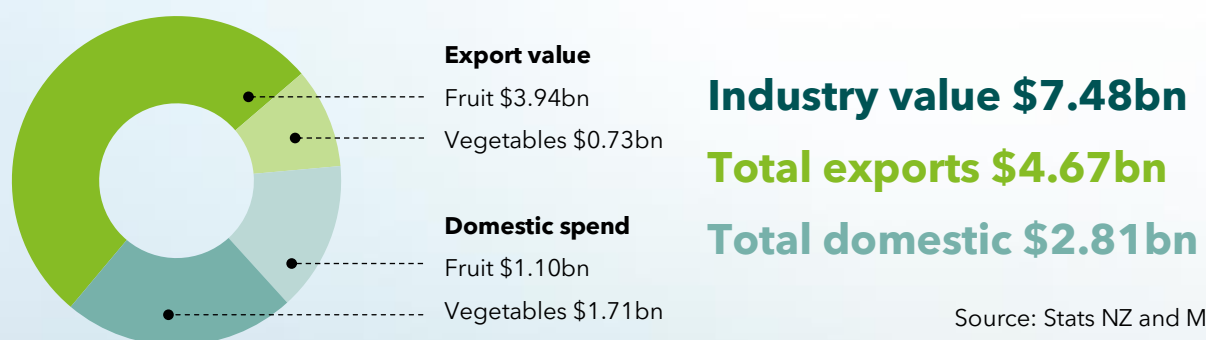
HortNZ represents the interests of approximately 4,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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.



# Submission

## 1. Plan Change B

HortNZ welcomes the opportunity to submit on Proposed Plan Change B and supports well-managed residential growth that maintains compatibility with the district's productive rural land. However, we have significant concerns regarding the lack of appropriate safeguards to manage reverse sensitivity effects at the interface between the General Residential Zone and the Rural Production Zone.

### 1.1. Sensitive Activities and Reverse Sensitivity

Reverse sensitivity means the potential for the operation of an existing lawfully established activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an existing activity.

The National Policy Statement for Highly productive Land (NPSHPL)<sup>1</sup> applies a directive policy on reverse sensitivity:

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

The policy applies in all circumstances where land-based primary production activities on HPL might be affected by reverse sensitivity effects – eg - those within rural zones and at the urban to rural interface. The policy is implemented in a number of ways including through 3.13:

#### *3.13 Managing reverse sensitivity and cumulative effects*

*(1) Territorial authorities must include objectives, policies, and rules in their district plans that:*

*(a) identify typical activities and effects associated with land-based primary production on highly productive land that should be anticipated and tolerated in a productive rural environment; and*

*(b) require the avoidance if possible, or otherwise the mitigation, of any potential reverse sensitivity effects from urban rezoning or rural lifestyle development that could affect land-based primary production on highly productive land (where mitigation might involve, for instance, the use of setbacks and buffers); and*

*(c) require consideration of the cumulative effects of any subdivision, use, or development on the availability and productive capacity of highly productive land in their district.*

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<sup>1</sup> <https://environment.govt.nz/assets/publications/National-policy-statement-highly-productive-land-sept-22-dated.pdf>

## 1.2. Inadequate Reverse Sensitivity Protection

HortNZ opposes the application of the standard 1-1.5 metre side and rear yard setbacks (GRZ-ST4.2a-c) where residential sites adjoin the Rural Production Zone. These setbacks are insufficient to manage reverse sensitivity effects and land use incompatibility at the rural - residential interface.

Horticultural operations in the Rural Production Zone often involve legitimate activities such as spraying, harvesting, machinery use, and early morning or night-time operations. These are critical to the productive use of the land and are often misunderstood or objected to by neighbouring residential occupants. Minimal setbacks at the interface significantly increase the risk of conflict, complaints, and restrictions of rural production, which undermines the intent of the Rural Production Zone and the National Policy Statement for Highly Productive Land (NPSHPL).

HortNZ has been strongly advocating for increased reverse sensitivity protections across district councils. Below provides a snapshot of operative or proposed setbacks in some key growing areas.

Table one: Internal setbacks in operative or proposed district plans

District Plan		Setback
Partially operative	Selwyn	30m for Residential Units and Seasonal Workers Accommodation
	Proposed Timaru	20m internal boundary setback from any other site boundary in a different ownership where a primary production activity is being conducted
Partially operative	Waikato	Parcel size less than 1.6ha a 25m setback from the boundary of an adjoining site greater than 6ha and 12m from a site less than 6ha. Parcel size greater than 1.6ha a 25m setback.
	Mackenzie District	10m structures and accessory buildings. 20m all other Buildings
Partially operative	Hawkes Bay	For sites greater than 2.5ha, minimum setback of buildings for an activity from internal boundaries is 15m. For sites 2.5ha or less, minimum setback of buildings for an activity from internal boundaries shared with an adjoining lot greater than 2.5 ha is 15m. For sites 2.5ha or less, minimum setback of buildings for an activity from internal boundaries shared with an adjoining lot 2.5 ha or less or from land zoned General Residential is 5m, provided the setback from any adjoining lot larger than 2.5 ha is 15m.
	Operative Western Bay	30m for front, side and rear yards for minor dwellings

## 2. Conclusion

HortNZ supports well-planned residential growth in the Manawātū District, but this growth must be managed in a way that protects the continued operation of land-based primary production. The interface between residential zones and the Rural Production Zone is a critical planning boundary, and without appropriate safeguards, it becomes a source of increasing conflict and constraint on productive land use.

HortNZ encourages Council to take a proactive and nationally consistent approach to managing land use compatibility at the rural-residential interface by embedding stronger provisions within Proposed Plan Change B.

We thank the Council for the opportunity to provide input and welcome the chance to work constructively on provisions that support both residential growth and a thriving, productive rural sector.

## Submission on Plan Change B: General Residential

Without limiting the generality of the above, HortNZ seeks the following decisions on Plan Change B 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
<b>Setbacks</b>			
GRZ-ST4.2d Exceptions to side and rear boundaries	Oppose	A small setback metres is inadequate at the interface with the Rural Production Zone because it does not provide sufficient separation to avoid reverse sensitivity effects. Applying urban-scale setbacks at the rural interface fails to recognise the fundamentally different nature and effects of rural production activities and creates a long-term risk of land use conflict.	Add the following rule to GRZ-ST4.2d:  <b><u>Where a site adjoins land zoned Rural Production, the minimum side and rear setback for buildings and accessory buildings shall be 30 metres, unless an alternative setback is agreed through the neighbours written agreement that demonstrates that reverse sensitivity effects will be avoided or adequately mitigated.</u></b>
GRZ-ST4.5 Non-residential setbacks	Oppose in part	A small setback metres is inadequate at the interface with the Rural Production Zone because it does not provide sufficient separation to avoid reverse sensitivity effects. Applying urban-scale	Add the following rule to GRZ-ST4.5  <b><u>Where a site adjoins land zoned Rural Production, the minimum side and rear setback for buildings and</u></b>

		<p>setbacks at the rural interface fails to recognise the fundamentally different nature and effects of rural production activities and creates a long-term risk of land use conflict.</p>	<p><b><u>accessory buildings shall be 30 metres, unless an alternative setback is agreed through the neighbours written agreement that demonstrates that reverse sensitivity effects will be avoided or adequately mitigated.</u></b></p>
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