

FURTHER
SUBMISSION

FS56

Kaipara Proposed District Plan Further Submissions

15 December 2025

To: Kaipara District Council

Name of Submitter: Horticulture New Zealand

Contact for Service:

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OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Further submissions on behalf of HortNZ

Our submission

The details of HortNZ's further submissions and decisions we are seeking from Council are set out below.

HortNZ's Role

Background to HortNZ

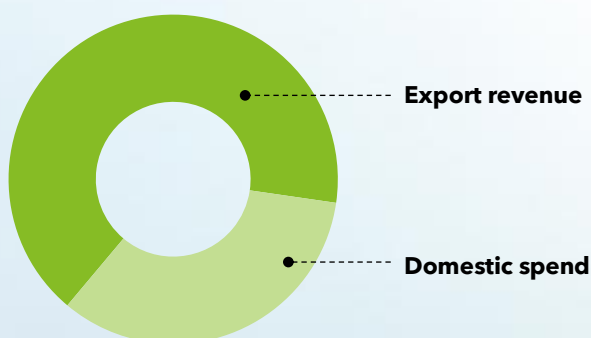
HortNZ represents the interests of approximately 4,300 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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.



Further Submission

1. Horticulture New Zealand's (HortNZ) further submissions are contained in the attached table below.
2. HortNZ represents commercial fruit and vegetable growers in the Kaipara district, so represents a relevant aspect of the public interest.
3. HortNZ is not a trade competitor and could not gain any advantage in trade competition through this further submission.
4. HortNZ wishes to be heard in support of its further submissions.
5. If others make similar submissions, HortNZ will consider presenting a joint case with them at the hearing.

Further submission on behalf of HortNZ on Kaipara proposed District Plan

	Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
FS56.1	Cato Bolam Consultants Limited	217.156	General	Support in part.	Strengthens plan support for worker housing, consistent with the seasonal accommodation provision HortNZ has sought	Allow the submission in full
FS56.2	Astute Consulting	110.18	General		HortNZ opposes the imposition of a blanket impermeable surface limit of 10-15% in the GRUZ. Such limits are not effects based and would unduly constrain horticultural production, including packhouses, cool stores, sheds and worker accommodation. Stormwater can be more appropriately managed through targeted design standards rather than arbitrary coverage limits.	Disallow the submission in full
FS56.3	New Zealand Agricultural Aviation Association	146.42	GRUZ-O2	Support	HortNZ supports provisions that prioritise primary production and ancillary activities that support it, as these activities are fundamental to the efficient operation, development and long-term viability of horticultural enterprises.	Allow the submission in full

FS56.4	Federated Farmers	136.165	GRUZ-O3	Reject	HortNZ supports strong protection of highly productive land consistent with the NPS-HPL. However, the removal of the term "inappropriate" weakens alignment with the NPS-HPL	Disallow the submission in full
FS56.5	Khans Developments and Investments Limited	249.13	GRUZ-P1	Reject	Commercial and industrial activities generally have no functional or operational need to be located within the General Rural Zone. Unlike primary production and its ancillary activities, commercial and industrial uses do not rely on the productive capacity of rural land and can typically be accommodated within appropriately zoned business or industrial areas where servicing, infrastructure, and reverse sensitivity effects can be more effectively managed. Enabling such activities in the General Rural Zone risks fragmenting productive land, undermining the long-term viability of rural production, and introducing land-use conflicts that place pressure on established primary production activities. Over time, this can erode the purpose of the zone and compromise the protection of highly productive	Disallow the submission in full

				land, contrary to the intent of the National Policy Statement for Highly Productive Land.		
FS56.6 and FS56.7	New Zealand Agricultural Aviation Association	146.44 146.46	GRUZ-P2 GRUZ-P4	Support in part	While HortNZ supports the inclusion of agricultural aviation activities, this should not come in the expense of fertiliser application which can be done via aviation or handheld or motorised apparatus.	Allow the submission in part
FS56.8	Royal Forest and Bird Protection Society of New Zealand Incorporated	149.113	GRUZ-P2	Reject	HortNZ opposes the replacement of "enable" with "recognise". Primary production activities necessarily generate noise, odour, dust, traffic movements, spraying and harvesting effects. Using "recognise" weakens the policy intent and increases reverse sensitivity risk by failing to clearly support the lawful operation, development and expansion of primary production activities within the General Rural Zone.	Disallow the submission in full
FS56.9	Daytona Trust	263.47	GRUZ-P5	Reject	Removing this requirement would significantly weaken the policy framework by allowing activities that do not rely on rural land, or the productive capacity of that land, to establish in the GRUZ. The functional or	Disallow the submission in full

FS56.10

				<p>operational need test plays an important gatekeeping role by ensuring that activities locating in the GRUZ have a genuine connection to rural production or rural land resources. Retaining this requirement helps maintain the integrity and purpose of the zone, protects productive land from inappropriate use, and provides clarity and certainty for both plan users and decision-makers.</p>	
Tappenden Holdings Limited	289.47	GRUZ-P5	Reject	<p>Removing this requirement would significantly weaken the policy framework by allowing activities that do not rely on rural land, or the productive capacity of that land, to establish in the GRUZ. The functional or operational need test plays an important gatekeeping role by ensuring that activities locating in the GRUZ have a genuine connection to rural production or rural land resources. Retaining this requirement helps maintain the integrity and purpose of the zone, protects productive land from inappropriate use, and provides clarity and certainty for both plan users and decision-makers.</p>	Disallow the submission in full

FS56.11	Khans Developments and Investments Limited	249.15	GRUZ-P5	Reject	Removing this requirement would significantly weaken the policy framework by allowing activities that do not rely on rural land, or the productive capacity of that land, to establish in the GRUZ. The functional or operational need test plays an important gatekeeping role by ensuring that activities locating in the GRUZ have a genuine connection to rural production or rural land resources. Retaining this requirement helps maintain the integrity and purpose of the zone, protects productive land from inappropriate use, and provides clarity and certainty for both plan users and decision-makers.	Disallow the submission in full
FS56.12	Bream Tail Residents Association Incorporated	300.59	GRUZ-P5	Reject	Removing this requirement would significantly weaken the policy framework by allowing activities that do not rely on rural land, or the productive capacity of that land, to establish in the GRUZ. The functional or operational need test plays an important gatekeeping role by ensuring that activities locating in the GRUZ have a genuine connection to rural production or rural land resources. Retaining this requirement helps	Disallow the submission in full

				maintain the integrity and purpose of the zone, protects productive land from inappropriate use, and provides clarity and certainty for both plan users and decision-makers.	
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