

# SUBMISSION ON

# National Policy Statement for Natural Hazards

25 July 2025

**To:** Ministry for the Environment

**Name of Submitter:** Horticulture New Zealand

**Supported by:** Hawke's Bay Vegetable Growers Association,  
NZ Apples & Pears, NZ Tamarillo Growers Association,  
Pukekohe Vegetable Growers Association, Vegetables NZ

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## Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for the Environment for the opportunity to submit on Package 1: Infrastructure and development and welcomes any opportunity to continue to work with the Ministry for the Environment 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

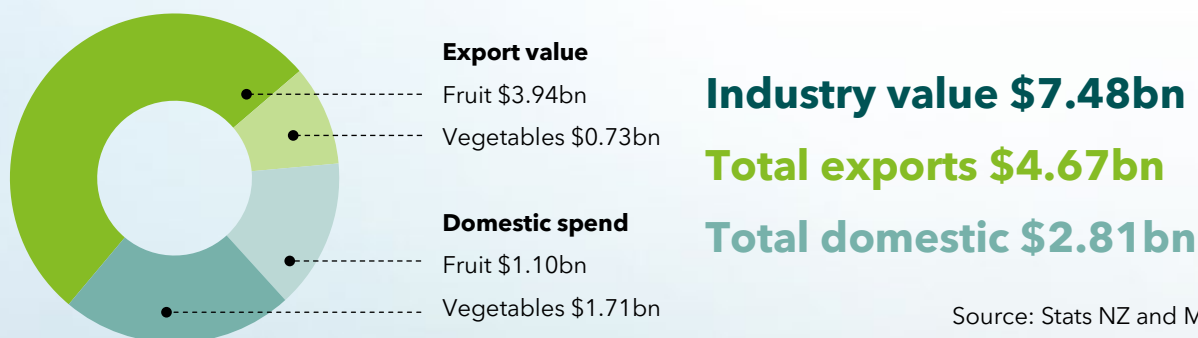
HortNZ represents the interests of approximately 4,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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. Horticulture and natural hazards

HortNZ submitted on the proposed National Policy Statement for Natural Hazards (NPS-NH) in November 2023.<sup>1</sup> We also submitted on the Building Resilience to Hazards Long-term Insights Briefing in November 2024.<sup>2</sup>

### 1.1. Proposed National Policy Statement for Natural Hazards

The proposed NPS-NH explicitly excludes primary production (as defined in the National Planning Standards) and any activities ancillary to primary production. The definition of primary production in the National Planning Standards states,

<b>primary production</b>	means:
	<ul style="list-style-type: none"> <li>(a) any aquaculture, agricultural, pastoral, horticultural, mining, <b>quarrying</b> or forestry activities; and</li> <li>(b) includes initial processing, as an <b>ancillary activity</b>, of commodities that result from the listed activities in a);</li> <li>(c) includes any <b>land</b> and <b>buildings</b> used for the production of the commodities from a) and used for the initial processing of the commodities in b); but</li> <li>(d) excludes further processing of those commodities into a different product.</li> </ul>

By HortNZ's interpretation, this means that the following activities, buildings and structures associated with horticulture are considered primary production and will be excluded from the NPS-NH:

- Growing fruits and vegetables, cultivation
- Artificial crop protection structures and crop support structures
- Frost fans, audible bird scaring devices
- Tunnel houses and greenhouses
- Packhouses and sheds

The key point of HortNZ's previous submission on the NPS-NH was that urban risk accounting frameworks should not be applied to primary production activities. The exclusion for primary production and ancillary activities resolves our concerns, and we support this approach.

<sup>1</sup> [23.11.15 HortNZ FINAL Submission on NPS-NHD.pdf](#)

<sup>2</sup> [24.11.26 HortNZ-FINAL-Submission-on-Hazards-Long-Term-Briefing.pdf](#)

The following section responds directly to the consultation questions.

**Q. 72** Should the NPS-NH apply to all new subdivision, land use and development, and not to infrastructure and primary production?

HortNZ supports that primary production is not included in the scope of the NPS-NH.

## 1.2. Workers' accommodation

HortNZ's interpretation is that seasonal workers' accommodation will be included in the scope of the proposed NPS-NH on the basis that natural hazard risk should be managed for all forms of residential use. We support this approach but strongly recommend that the NPS-NH **provide a pathway for district plans to take a nuanced and locally responsive approach to managing seasonal workers' accommodation in rural areas.**

Seasonal workers' accommodation is essential to the operation of the horticulture sector. It serves a clear functional need to house workers close to production sites, in rural environments that may intersect with natural hazard areas. Horticulture often occurs on flood plains given the fertility of the soil. Given this functional relationship, the appropriate policy response is often to mitigate hazard risk rather than require the accommodation to be located outside any potentially hazardous environment. Plans often do not permit seasonal workers' accommodation in the urban or industry environment. If it is not permitted in the rural environment, it may not be permitted to locate in any zone. A locally tailored, risk-informed approach through district plans is more appropriate than a blunt national directive.

The National Planning Standards definition of primary production does not include seasonal workers' accommodation because it is not a building directly used for the production or initial processing of commodities. District plans typically provide a permitted activity status with standards for primary production activities and separate controls for residential activities, including seasonal workers' accommodation.

In HortNZ's experience, district plans have consistently considered seasonal workers' accommodation a supporting activity to primary production, in the context of the National Policy Statement for Highly Productive Land (NPS-HPL), recognising its functional relationship to onsite labour needs in the horticulture sector. The functional need for workers to be located on orchard or farm is recognised in the Ministry for the Environment guidance on the NPS-HPL, which states that supporting activities are,

"those activities reasonably necessary to support land-based primary production on that land (such as on-site processing and packing, equipment storage, and animal housing)...Activities such as **residential accommodation for the landowner and/or farm staff, seasonal worker accommodation**, sheds for farm machinery, workshops for repairing and maintaining equipment and roadside sales of goods produced on site would all be anticipated under this clause where these support land-based primary production"<sup>3</sup> (emphasis added).

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<sup>3</sup> MfE. [National Policy Statement for Highly Productive Land: Guide to implementation](#). March 2023. (p. 28)

For the purposes of risk management, seasonal workers' accommodation is unlikely to be considered an "ancillary activity". It is helpful to consider how similar matters have been handled elsewhere in the RMA framework. The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 uses the RMA definition of "production land" and then has a separate rule structure for the activity of Residential within Production Land (C15.(8)). This recognises the need for a tailored risk management approach for rural residential activities, distinct from those in the urban environment.

While seasonal workers' accommodation is not occupied year-round, those living in it face the same hazard risks as other residential occupants. Accordingly, natural hazard risk must be appropriately managed. That risk management should not undermine the ability of the horticulture sector to function effectively.

Managing natural hazard risks to seasonal workers' accommodation requires a nuanced approach that recognises the functional need for workers' accommodation to be on or near horticultural operations. This approach is best navigated through district plans and industry guidance, rather than national direction and supports the Government's dual objectives of natural hazard resilience and enabling the productive use of highly productive land.