

From: info@waipadc.govt.nz
To: [Policy Shared](#)
Subject: External Sender: Waipā District Plan - Plan Change Submission Form 5 - Federated Farmers Waikato
Date: Friday, 20 February 2026 3:57:21 pm

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Full name of submitter Federated Farmers Waikato

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Contact phone number [REDACTED]

This is a submission on the following proposed plan change to the Waipā District Plan

Plan Change 25

Could you gain an advantage in trade competition through this submission? I could not

Are you directly affected by an effect of the subject matter that - (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition? I am

Do you wish to be heard (attend and speak at the Council hearing) in support of your submission? I do

If others make a similar submission, will you consider presenting a joint case with them at the hearing? Yes

Do you support the proposed change(s)? I support in part

The specific provisions of the plan change my submission relates to are (give details):

Please see attachment

My submission is

Please see attachment

I seek the following decision/s from Council

Please see attachment

Attachments

[PC25 Waipa.pdf](#) (396 kb)

SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ



Form 5

Submission on publicly notified proposal for policy statement or plan Clause 6 of First Schedule, Resource Management Act 1991

To: Waipa District Council
23 Wilson St
Cambridge 3434

[REDACTED]
[REDACTED]

Via email: districtplan@waipadc.govt.nz

Submission on: **Proposed Plan Change 25**

Date: 20 February 2026

Submission by: Federated Farmers of New Zealand – Waikato

Phil Sherwood

WAIKATO PROVINCIAL PRESIDENT

Federated Farmers of New Zealand

■ [REDACTED]
■ [REDACTED]

Address for service: **Isaac McIntyre**

SENIOR POLICY ADVISOR

Federated Farmers of New Zealand

M [REDACTED]
■ [REDACTED]

1. Federated Farmers of New Zealand – Waikato (Federated Farmers) could not gain an advantage in trade competition for this submission.
2. Please refer to the attached table for the specific provisions of Proposed Plan Change 25 that the submission relates to. The table also contains the details of Federated Farmers' submission and whether we support or oppose the specific provisions on which we have submitted.
4. The decisions sought by Federated Farmers are outlined in the table attached to this submission.
5. We wish to be heard in support of this submission.
6. If others make a similar submission, Federated Farmers will consider presenting a joint case with them at a hearing.

7. Federated Farmers seeks any consequential changes necessary to give effect to the relief sought in each of the individual submission points made.
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1.0 Introduction

- 1.1 Federated Farmers of New Zealand – Waipa Branch (**Federated Farmers**) supported by Federated Farmers Waikato welcomes the opportunity to submit on Waipa District Council's (**Council**) proposed Plan Change 25 (PC25).
- 1.2 Federated Farmers acknowledges any submissions that have been made by individual members.
- 1.3 Federated Farmers are a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses.
- 1.4 Farming has a strong presence in the Waipa district and contributes significantly to the wider Waikato and Bay of Plenty regions. Federated Farmers represent a variety of dairy, dry stock and horticulture land users and seeks to uphold and enhance the value of farming in the region.
- 1.5 Federated Farmers aim to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
 - (a) our members may operate their business in a fair and flexible commercial environment;
 - (b) our members' families and their staff have access to services essential to the needs of the rural community; and
 - (c) our members adopt responsible management and environmental practices.
- 1.6 Federated Farmers is actively involved in district plan and plan change reviews across New Zealand. Primary production activities from our members make a significant contribution to the economic, social, and cultural well-being of New Zealand.
- 1.8 A lot of regulations have come at a significant cost on financial and mental health within the primary sector. Many of the costs are unnecessary and place additional pressure on the primary industry for questionable environmental gain. Planning provisions designed to meet central government directions for climate change, biodiversity, outstanding natural features, and rural land use activities need to be carefully considered to ensure that decision making strikes the right balance between resource use and resource protection.

2.0 General Comments

- 2.1 In general, Federated Farmers members want a plan change that:
 - (a) balances environmental, cultural, social, and economic values;
 - (b) ensures rules are equitable, cost-effective, pragmatic and effects based;
 - (c) is written in plain English, is consistent and follows a clear, user-friendly format;
 - (d) acknowledges and rewards the positive impacts farming has on conservation, and
 - (e) recognizes the importance of collaborating with communities to achieve desired environmental outcomes.
- 2.2 There is an expectation that Councils, when undertaking a plan change, will adopt a no-frills approach and only target what is necessary to manage and resolve any issues occurring in the district and to meet their responsibilities under the Resource Management Act 1991 (RMA).
- 2.3 Our members who work and live rurally play a critical role for the community contributing in economic, environmental, social, and cultural aspects of the district. It is essential that the Council takes this into consideration when making decisions impacting rural people.
- 2.5 Rural ratepayers are constantly interacting with both natural and built resources and rely heavily on these resources. Farmers and primary producers are very aware of the importance of managing these resources effectively, responsibly, and sustainably to provide for the viability of both their businesses and the resources for future generations.
- 2.6 It is important that Councils use every means available to them to keep the costs imposed on farmers as low as possible. Farmers and growers are price takers and cannot pass on rising costs to consumers. Rising farming costs (including Council costs) are the key driver behind

farmers needing to continually raise farm productivity to remain viable. This usually results in intensification and, in turn, may place additional pressure on the district's resources.

- 2.7 The importance of the economic use of land needs to be recognised through PC25. A sizable proportion of the district earns a living off the land, which provides not only for those families, but also to district and regional wealth.

3.0 Reverse Sensitivity

- 3.1 The horticulture sector is facing increasing issues with reverse sensitivity as more people move into productive areas with unrealistic expectations about the activities involved in primary production.
- 3.2 PC25 has a strong focus on amenity effects, this must be balanced against objectives and policies that provide for primary production activities as a legitimate and expected activity in the Rural Zone. District Plans require a well-defined management framework that incorporates realistic setbacks and promotes the use of hedges and shelterbelts as effective mitigation tools for reverse sensitivity issues. This approach helps minimise the loss of productive land while ensuring better compatibility between productive activities and surrounding properties.
- 3.3 Federated Farmers seeks better protection of primary production activities by ensuring setbacks and mitigation measures, such as hedges and shelterbelts, are incentivised into the plan to minimise conflicts between rural production and residential amenity. For example, the planting of a hedge to screen Artificial Crop Protection Structures enables efficient use of the soil particularly in a high amenity landscape with versatile soils. These provisions will help the proposed rules better align with Policy 3.13 in the NPS HPL for managing reverse sensitivity effects.

4.0 Artificial Crop Protection Structures

- 4.1 Horticulture is a constantly evolving industry, with growers seeking more sustainable and efficient ways to produce high-quality crops. One innovation is the increased use of artificial crop protection structures which support better crop growth with minimal environmental impact.
- 4.2 37% of the soils found within the Rural Zone of the Waipa District are high-class soils (LU Classes 1, 2 and 3). Noting that this percentage excludes Peat Soils, which have been recognised in the NPS- HPL as Class 3. These contribute to over 9% of the high-class soils nationally.
- 4.3 Artificial Crop Protection Structures increase the productivity of horticultural activities, and when established on highly productive soils, this land use meets the intent of the NPS – HPL, which promotes the efficient use of land for primary production. The NPS-HPL prioritises the protection and sustainable use of highly productive land, ensuring its long-term availability for agricultural purposes.
- 4.4 Some of the rules in PC25 focus on rural character and amenity and don't balance these effects with maximising the production potential of rural-zoned land. This approach is in direct conflict with both the NPS-HPL's objectives and the reality of rural land use. A recent Commissioners' decision for ACPS in the Waipā District (LU/0147/22 and LU/0252/22) granted resource consent with the following conclusion: "13.3 Furthermore, the submitters (from a pragmatic point of view) should not expect the level of privacy and amenities that might be expected in a residential neighbourhood. The occupiers of what is a relatively small property in a rural area should expect neighbouring land to be developed and used for purposes as proposed in the applications." This decision emphasises that rural land, particularly highly productive land, should be used for primary production rather than over-prioritising residential amenity values.
- 4.5 The expectation is that rural residents should anticipate productive agricultural activities occurring nearby, which aligns with the principles of the NPS-HPL and supports the efficient use of Waipā District's rural land.

5.0 Shelterbelts or Hedges

- 5.1 Shelterbelts are crucial for primary production, providing shelter from wind turbulence. They also act as a barrier between productive activities and adjoining properties, minimising any visual

effects on neighbours. Like the setbacks for Artificial Crop Protection Structures, the setbacks proposed for shelter belts will also contribute to a loss in production land. 22. NZKGI seeks provisions that support the use of shelterbelts and hedges for both their functional benefits and visual screening.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
Definitions				
Artificial Screen	3	Support	Federated farmers support the definition of Artificial Screen	N/A
Artificial Crop Protection Structure	4	Support	Federated Farmers support the definition of Artificial Crop Protection Structure as this aligns with the National Planning Standards and ensures these structures are not defined as a building in accordance with the district plan.	N/A
Crop Support Structures	5	Support	Federated farmers support the definition of Crop Support Structures	N/A
Farming Activities	6	Support	Federated farmers support the amendment of farming activities to include artificial crop protection structures and support structures This amendment aligns with the National Planning Standards.	N/A
Section 4 – Rural Zone				
4.1.3	7	Support	Dairy farming has been acknowledged as a prominent activity in the district. Federated Farmers supports the inclusion of horticulture and crop production as being common throughout the district and recognising it as diversification in rural activities in the district.	N/A
4.1.12	5	Support	Federated Farmers supports the addition of crop support, protection structures and shelterbelts as being part of rural character to more accurately reflect the nature of the rural area.	N/A
4.3.2	6	Support in part	Federated Farmers supports in part the objective that artificial crop protection structures and crop support structures shall be located and scaled to minimise adverse effects on rural character and amenity but they should also be recognised as essential infrastructure within the rural zone and are necessary for providing for rural activities within a zone that focuses on rural activities.	Less emphasis on character and amenity of essential infrastructure that is required to support rural activities within the rural zone.

Proposed District Plan provision	Submission Point	Support / Oppose	Federated Farmers Submission	Relief Sought
			A new policy is required to better ensure that reverse sensitivity effects on rural activities are acknowledged and addressed.	To avoid reverse sensitivity effects and ensure that rural activities are not adversely affected by the establishment of sensitive activities in the Rural Zone.
4.4.2(a)(c)	7	Support	Federated Farmers supports this performance standard of Artificial Crop Protection Structures and Crop Support Structures being 6m from any road boundary and no setback applies her the structure is screened by an existing shelterbelt.	N/A
4.4.2.9(A)	8	Oppose	Artificial crop protection structures can exceed 6m in height. Numerous District Plans permit a range of heights varying between 8 – 12m in height.	The rule should be amended to allow structures up to 9m in height as a permitted activity.
21.1.4.13	10	Support in Part	Federated Farmers supports the matters of discretion, but another matter should be added that considers the positive effects of Shelterbelts for character and amenity purposes that mitigates the effects of Artificial Crop Protection Structures	Positive effects of Shelterbelts for character and amenity purposes that mitigates the effects of Artificial Crop Protection Structures
21.1.4.29	11	Support in Part	Federated Farmers supports the matters of discretion, but another matter should be added that considers the productive benefits of the structures.	The productive benefits of artificial crop protection structures
25.2.12	12	Support in Part		
25.3.10.1	13	Oppose	Federated Farmers seeks	Federated Farmers seek that Artificial Crop Protection Structures and Crop Support Structures can be located in natural landscapes and viewshafts where they are screened by vegetative hedges or shelterbelts.
25.4	14	Oppose in Part	Amend 25.4.1.1h	Federated Farmers seek the inclusion of permitted activity rule with standards. where the standards are not met. Permitted activity standards Dark green or black cloth shall be used on all vertical faces Green or black cloth shall be used horizontally where the slope is over 100 The structure shall be set back at least 50m of MHWS The structures shall be set back 5m from the road boundary unless screened with natural shelter Where a continuous cover of white cloth is used horizontally, the natural shelter shall be provided to separate blocks so that the maximum continuous cover in any one block is 5 hectares.

