

Summary of Statement for the Hearing on Plan Change 25

Matt Boyd 17 August 2026

Artificial Crop Protection Structures (ACPs) and Shelterbelts — Key points

Background

I am a resident of Karapiro, a submitter on PC-25, and a member of the council working group established during its development. My submission supports the general direction of PC-25 and the S42A report, and proposes a small number of refinements. I oppose several changes sought in the industry submission (NZKGI, Hort NZ, Federated Farmers), which in my view would remove the balance the plan currently achieves.

Three principles requested

- Balance — between growers' operational needs and neighbours' amenity.
- Fairness — outcomes not determined by which party has greater legal/planning resource.
- Clarity — rules precise enough to be measured and enforced.

Requested changes which I will be speaking to — own submission

Clause	Issue	Requested change
7/3	Shelterbelt screening currently required only for road frontage, not neighbouring dwellings.	Require shelterbelt planting where a dwelling is within 50m; obligation attaches whichever of orchard/dwelling is established first.
7/4	Shelterbelt height rule does not state when height is measured, allowing growth beyond the 6m limit between trims.	Maximum height of 6m to apply at any point in the trim cycle; trim cycle capped at 18 months.
7/5	Screening exemption wording does not require the screening to exist at time of construction.	Require screening to be in place and effective when the ACP is constructed, not at a future date.
7/6	No stated process or decision-maker for granting exemptions.	Introduce a documented exemption process specifying who assesses and approves each exemption.

Points opposed (industry submission) which I will be speaking to

Clause	Industry request	Basis for opposing
16/9	Insert “some” into a key clause.	Reduces precision without stated justification; supported by S42A rejection.

16/15	Zero setback for ACPs.	Removes the plan's intended certainty and protection; compounds visual, spray drift, and shading effects on neighbouring properties.
16/16, 16/17	Raise ACP and shelterbelt height limits from 6m to 9m.	Increases shading and visual effect; resource consent available above 6m for genuine need.
16/18, 16/19	Reduce setback from 4m to 3m.	Does not address shelterbelt canopy spread (up to ~8m for commonly used species); machinery clearance data (~3m minimum) indicates 3m setback is impractical.
16/26	Amend viewshaft wording.	Introduces subjectivity that undermines enforceability; retain wording as drafted.
16/27	Permit ACPs in special landscape/viewshaft areas without assessment.	These areas already carry tighter controls on all development; individual assessment for ACPs should be retained, consistent with other activities.

Cross-cutting points

- Compliance obligations are already standard practice for commercial horticultural operations and are not unduly onerous.
- Higher-value land does not justify reduced controls; if anything, it indicates greater potential effects and a greater need for clear rules.
- Rules should specify precise measurement points (e.g., height measurement timing, setback measured from post or structure edge) to avoid future disputes.

Requested outcome

That the Commissioners adopt the S42A report's recommendations in the main, incorporate the additional refinements set out above, and decline the industry submission's proposed relaxations to setbacks, heights, and assessment requirements in special landscape areas.