

**BEFORE THE HEARING COMMISSIONERS  
WAIKATO DISTRICT COUNCIL**

**IN THE MATTER of the Resource Management Act 1991**

**AND**

**IN THE MATTER of Hearing 3: Strategic Objectives of the Proposed  
Waikato District Plan**

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**STATEMENT OF HILARY JEAN WALKER ON BEHALF OF FEDERATED FARMERS  
OF NEW ZEALAND**

**14 October 2019**

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## **Introduction**

1. My name is Hilary Jean Walker. I am a Senior Policy Advisor with Federated Farmers of New Zealand (**FFNZ**).
2. I have reviewed the s 42A report dated 30 September 2019, for Hearing 3 – Strategic Objectives in relation to the Proposed Waikato District Plan (**PWDP**). This report addresses matters to which FFNZ made submissions (submitter 680) and further submissions (FS1342).
3. FFNZ has opted not to attend Hearing 3 – Strategic Objectives scheduled to commence the week beginning 4<sup>th</sup> November 2019 and requests that this statement be tabled for the Hearing Commissioners' consideration.
4. The contents of this statement are made in my role as Senior Policy Advisor, in response to some of the key planning report recommendations made on the FFNZ's submission points that have been assigned to this hearing topic.
5. I apologise for not attending in person at the hearing.

### **Submission point 680.20 on PWDP Section 1.12.2 (section 8.1.1 of the s42A report)**

6. The submission and relief sought for Section 1.12.2 as been over simplified in the planning report summary at paragraph 58. The relief sought is provided below for ease of reference:

**Amend 1.12.2 as follows and make any consequential changes needed to give effect to this relief:**

- 1.12.2 Natural environment*
  - (a) *A district that values protects its natural habitat and ecology values and retains its significant landscape features.*
  - (b) *A district that acknowledges the tension between the private cost and public benefit of maintaining or enhancing the District's natural environment.*
  - (c) *A district that where retains the natural character of its rural areas and has access to the public open space is available for public enjoyment and use and well used by the community.*
7. The focus of the planning analysis and recommendation to reject the submission point, at paragraph 60 and 62, relates to proposed additional subclause (b) only. With respect, no consideration was given to the changes sought for (a) and (c).
8. FFNZ is concerned that the notified wording of (a) sets a strategic objective for the natural environment which cannot reasonably be achieved. Whilst the protection of

areas of significant indigenous vegetation and significant habitats of indigenous fauna is an important statutory directive that is acknowledged and supported. The notified wording inappropriately elevates all natural habitat and ecology to that significance standard regardless of whether or not it is indigenous biodiversity or meets a significance threshold test.

9. The proposed amendment to (a) sought to introduce a better balance by acknowledging the value and importance of natural habitat and ecology to the district without the prioritisation regime created by the direction to ‘protect’ it.

**Submission point 680.22 on PWDP Section 1.12.8(b) (Section 11.1.1 of the s42A Report)**

10. The planning recommendation accepts, in part, the submission point. This is appreciated by FFNZ.

**Submission point 680.53 on PWDP Policy 4.1.10 (Section 22.1.1 of the s42A Report)**

11. The notified plan includes a policy (4.1.10) to protect existing intensive farming and industrial activities in Tuakau from the reverse sensitivity effects of new residential development.
12. FFNZ sought to have this recognition of reverse sensitivity effects applied more broadly to include rural production activities. The submission point is recommended to be rejected, at paragraph 174, on the basis that applicable setback rules do not apply to rural production activities and as such the amendment is unnecessary.
13. It is FFNZ experience that reverse sensitivity issues inevitably arise when urban uses of land displace rural uses of that same land. FFNZ is particularly concerned to see that areas of productive land adjacent to areas that are designated to become urbanised, wherever they may be, are protected from the reverse sensitivity effects that might arise from new activities taking place in such areas.
14. If incorrectly handled, reverse sensitivity effects can restrict how primary sector enterprises can operate, and that this compromises the productivity of the land. Urban expansion around horticultural food hubs and agricultural operations such as dairy and calf rearing in particular, can create tension between newly arrived groups and established producing communities.
15. The proposed amendment to policy 4.1.10 was included to ensure plan users are made aware of the types of producing activities that can be anticipated and expected to take place within the rural/urban boundary.

**Submission point 680.54 on PWDP Policy 4.1.15 (Section 27.1.1 of the s42A Report)**

16. The notified plan includes a policy (4.1.15) to protect existing intensive farming and industrial activities in Ngaruawahia from the reverse sensitivity effects of new residential development.
17. FFNZ sought to have this recognition of reverse sensitivity effects applied more broadly to include rural production activities. The submission point is recommended to be rejected, at paragraph 226, on the basis that applicable setback rules do not apply to rural production activities and as such the amendment is unnecessary.
18. It is FFNZ experience that reverse sensitivity issues inevitably arise when urban uses of land displace rural uses of that same land. FFNZ is particularly concerned to see that areas of productive land adjacent to areas that are designated to become urbanised, wherever they may be, are protected from the reverse sensitivity effects that might arise from new activities taking place in such areas.
19. If incorrectly handled, reverse sensitivity effects can restrict how primary sector enterprises can operate, and that this compromises the productivity of the land. Urban expansion around horticultural food hubs and agricultural operations such as dairy and calf rearing in particular, can create tension between newly arrived groups and established producing communities.
20. The proposed amendment to policy 4.1.15 was included to ensure plan users are made aware of the types of producing activities that can be anticipated and expected to take place within the rural/urban boundary.

Hilary Walker  
14 October 2019