

**BEFORE THE HEARING COMMISSIONERS
AT WAIKATO DISTRICT**

IN THE MATTER of the Resource Management Act 1991 (“**the Act**”)

AND

IN THE MATTER of the hearing of submissions on The Proposed Waikato District Plan Hearing 18

**SUPPLEMENTARY STATEMENT BY LUCY CLARKE DEVERALL FOR
HORTICULTURE NEW ZEALAND
29 SEPTEMBER 2020**

1. This supplementary statement is in response to Council's rebuttal rejecting HortNZ's submission and evidence seeking artificial crop protection structures be excluded from boundary setback and daylight angle controls. Comment is also made on seasonal worker accommodation.
2. As discussed in my Industry Statement, artificial crop protection structures are an essential part of maximising highly productive/versatile land and supporting the ongoing operation and development of horticulture.
3. Attachment 1 contains an economic analysis on the cost of implementing the proposed boundary setbacks in the S42A report. Attachment 2 contains a testimonial from Mr Dan Peach, a berry grower local to Waikato District. The information from Mr Ford and Mr Peach clearly demonstrates that artificial crop protection structures are a critical component to key horticulture sectors that are present within Waikato District.
4. Mr Ford uses kiwifruit as an example and applies the proposed setbacks against a number of orchard scenarios of different shapes (oblong and square) and sizes (1.5ha, 5ha and 10ha) and different types of kiwifruit. The analysis finds that the proposed setbacks would result in 15% - 46% of land not being covered by artificial crop protection structures.
5. Mr Ford then provides an analysis of the economic impacts of the proposed setbacks. For example, on a SunGold kiwifruit orchard, the proposed setbacks would result in:
 - annual net orchard returns less \$208,000 for the 10ha oblong site and \$60,000 for the 1.5ha square site, and
 - a loss to orchard value of between \$676,000 for a 1.5ha square site and \$2.4million for a 10ha oblong site.

6. Such losses would render these operations unviable and significantly impact the productive capacity of highly productive land. This is supported by Mr Peach who outlines from an operational perspective the need to maximise horticultural land in order to remain viable and to continue supporting the local community and economy.
7. Council's rebuttal analysis of HortNZ's submissions appears to be based on the premise that different people have different perceptions of rural character and amenity. This is entirely true however; it is also part of the problem. Particularly, when judgements on rural character and amenity are made by those who may not be familiar with the local rural environment.
8. Council's rebuttal increases minor dwelling units up to 120m², but continues to bundle worker accommodation with minor dwelling units in the policy framework. There needs to be specific recognition for bespoke facilities such as seasonal worker accommodation. Recent Covid-19 events have demonstrated the impact of worker shortages on restraining supply of fruit and vegetables to markets. New Zealand's economy is facing a \$9.5billion loss due to a shortage of seasonal workers for the apple and pear harvest¹. In response, the Government has opened borders for a limited number of seasonal workers² and extended visa's for those working in the horticulture industry³.
9. As noted in my industry statement, employers are required to provide purpose-built accommodation and have a duty of pastoral care. These facilities are a critical component to supporting ongoing operation and development of the horticulture industry and enabling continued supply of fruit and vegetables to communities.
10. I take this opportunity to re-enforce sentiments from my industry statement:
 - The rural environment is a working environment with machinery and structures that are visually present. The fruit sector is undeniably a feature of Waikato District's rural character and amenity, with the potential for growth.
 - Artificial crop protection structures have come about through practice change to meet market driven standards around quality and yield and in response to an increasingly volatile climatic environment. They afford protection from sunburn, wind, hail and birds. They can assist in pest management and assist spray coverage. Overtime, the effects of climate change are likely to result in significant uptake of artificial crop protection structures.
 - The structures are ancillary to legitimate primary production activities and form part of rural amenity. Visual impacts can be reduced through green or black netting on vertical surfaces.

¹ <https://www.stuff.co.nz/business/farming/122741361/this-just-cannot-happen-95-billion-at-risk-as-horticulture-sector-struggles-to-fill-25anhour-jobs>

² <https://news.fuseworksmmedia.com/6e2bd8e3-0990-487f-8090-a5b8636bbdd2>

³ <https://www.stuff.co.nz/business/farming/122848586/visa-changes-will-help-ease-labour-shortage-crisis-for-kiwi-growers>

- Given the low supply of high class soils in New Zealand, it is paramount to maximise that which is available in order to meet ever increasing demand for fruit and vegetables and to support viable business.
- The proposed setbacks and lack of recognition for seasonal worker accommodation are not conducive to regional strategic direction to support ongoing operation and development of primary production activities, such as horticulture.

Lucy Deverall
29 September 2020

