

BEFORE THE HEARINGS PANEL APPOINTED BY TIMARU DISTRICT COUNCIL

IN THE MATTER

of the Resource Management Act 1991
(the Act)

AND

IN THE MATTER

of hearing of submissions on The Proposed
Timaru District Plan

Hearing Stream B1: Rural

**INDUSTRY STATEMENT OF SARAH CAMERON FOR HORTICULTURE NEW
ZEALAND**

5 July 2024

PURPOSE AND SCOPE OF EVIDENCE

1. This statement responds to the Section 42A report recommendations in regard to the Horticulture NZ submission and further submissions to be considered at hearing B1 rural, specifically:
 - The interface with sensitive activities in the General Rural Zone (GRZ) and Rural Lifestyle Zone (RLZ)
 - Seasonal workers accommodation
 - Artificial crop protection structures
 - Shelterbelts

INTRODUCTION

2. HortNZ is the industry body for the horticulture sector, representing growers who pay levies on fruit and vegetables sold either directly or through a post-harvest operator, as set out in the Commodity Levies (Vegetables and Fruit) Order 2013.
3. On behalf of growers, HortNZ takes a detailed involvement in resource management planning processes as part of its national and regional environmental policy response.
4. My name is Sarah Cameron. I am a Senior Environmental Policy Advisor at Horticulture New Zealand (HortNZ). I am involved in HortNZ's national, regional, and district planning processes across New Zealand. I have been in this role since 2 May 2022.

REVERSE SENSITIVITY AND SENSITIVE ACTIVITIES

5. The GRUZ and RLZ are characterised by the presence of primary production activities and the associated sights, sounds and smells which accompany these activities.
6. Horticultural operations rely on the use of machinery, structures to support and protect crops, agrichemical and fertiliser application, heavy vehicles to transport produce, and many other activities that may generate a range of effects. These effects are characteristic and part of the landscape and amenity of rural environments.
7. Reverse sensitivity effects growers when occupants of a new activity or use complain about the effects of an existing, lawfully established horticultural activity or use. This can place significant economic burden and operational limitations on the grower reducing their economic viability and social licence to operate.
8. HortNZ is concerned that lawfully established horticultural activities will face reverse sensitivity because of the permitted activity status of the

following activities that may be sensitive to the effects of primary production:

- Education facilities
- Supported residential care
- Residential visitor accommodation
- Recreation activity.

9. The activity status and setbacks for sensitive activities (GRUZ-S4) are insufficient to provide an appropriate level of control or assessment for these activities. HortNZ supports the evidence of Mr Hodgson in this regard.

ACTIVITIES THAT SUPPORT HORTICULTURE

10. HortNZ sought a number of activities that support horticulture be provided for in the GRUZ and RLZ:

- Artificial Crop Protection Structures
- Crop Support Structures
- Frost Fans (NOISE chapter)
- Audible Bird Scaring Devices (NOISE chapter)
- Seasonal Accommodation

Seasonal Worker Accommodation

11. HortNZ seeks a workable planning framework for seasonal worker accommodation and supports the evidence of Mr Hodgson in this regard.
12. Seasonal worker accommodation provides for temporary and often communal living arrangements; it is quite distinct from permanent worker accommodation which might support a full-time employee and their family. Both are used in the horticultural sector.
13. It is a definable activity that requires a specific resource management response to reflect the nature of the activity. Accommodating workers in appropriate accommodation near their places of employment is more efficient for the horticulture industry than accommodation that will need to be found further afield and workers will be required to commute. This also alleviates pressure on the private rental market.
14. To assist in housing seasonal workers, the New Zealand Government's Recognised Seasonal Employer (RSE) scheme has been in place since 2007.
15. Government-run, the scheme allows employers within the horticulture and viticulture industries to recruit a capped number of workers from overseas – predominantly from the Pacific – for seasonal work in New Zealand.
16. The RSE scheme is a mutually beneficial partnership supporting the economies and communities of both Pacific nations and New Zealand. Pacific workers receive training, mentoring and develop skills they can take home to begin their own business ventures, while earning an income that is sent back to their families and the wider community.

17. At the same time, the RSE scheme supports New Zealand growing businesses during peak harvest times and enables the horticulture and viticulture industries to employ New Zealanders in skilled, full-time positions.
18. The scheme has been recognised by the World Bank as one of the best migrant labour schemes in the world.
19. Employers must meet a stringent set of government criteria to be granted RSE status (accreditation).
20. RSE status is only granted where employers meet the specific standards set out by Immigration New Zealand (INZ) such as evidence of their financial position, a demonstration of good employment practices, as well as a commitment to training and employing New Zealanders.
21. Once granted RSE status, employers must apply for an Agreement to Recruit (ATR) to bring Pacific workers into the country for seasonal work.
22. Under this ATR, employers must meet further obligations set out by INZ, including but not limited to satisfactory pastoral care, fulfilment of health and safety requirements and suitable accommodation and onsite facilities.
23. There have been recognised labour shortages in horticulture over the last few years and the RSE scheme has been instrumental in supplying labour however the scheme needs to be supported by district plan rules.
24. Several district plans have taken the approach of providing for seasonal workers accommodation based on a concept of shared kitchen and ablution facilities and separate sleeping quarters. This type of facility is cost efficient and adequately provides for seasonal accommodation.
25. Seasonal worker accommodation is used by growers and packhouses in the Timaru district. This ranges from privately owned rentals, motels, holiday units and a converted lodge.
26. There is a heavy reliance on RSE workers in the district and for those harvesting apples, seasonal worker accommodation is required for 3-4 weeks of the year. Packhouses tend to need accommodation for 5-6 months of the year.
27. Growth in the district will mean more seasonal worker accommodation is likely to be required. A new large-scale development is likely to require accommodation onsite to house up to 180 RSE workers.
28. HortNZ supports the inclusion of a seasonal worker accommodation rule framework and as stated, supports the evidence of Mr Hodgson.

Artificial Crop Protection Structures

29. Artificial Crop Protection Structures (ACPS) are critical for a number of sectors including apples. They provide a range of benefits including protection from sunburn, windburn, hail, frost and birds, assistance with spray coverage and reduced mowing and weeding requirements.

30. ACPS are structures that use permeable materials to cover and protect crops that are grown in soil and are typically permanent structures with considerable investment in materials (wire, poles, cloth).

Picture 2: Aerial footage of ACPS covering apple orchard



31. The height of ACPS varies depending on the crop but typically require headroom for the crop canopy and farm machinery.

Picture 3: Apple harvest machinery



32. Depending on the rootstock of an apple tree, a height of 5-6m can be reached.
33. Most if not all of the orchards in the Timaru district have ACPS. The height of the structures measure from 5-6m from the ground.
34. ACPS are typically positioned to assist with access and ongoing maintenance with typically, a track or space is provided for farm machinery access between the ACPS and the crop (see picture 1).
35. ACPS tend to be placed on or near the boundary as to utilise as much (normally highly productive land) as possible.
36. The typical purpose of height to boundary rules is to manage the height and bulk of buildings at boundaries to maintain a reasonable level of sunlight access and minimise adverse visual dominance effects to the immediate neighbour. Wholly applicable in an urban context where yard setbacks are less generous, these rules are less necessary in rural zones. In a rural context they overlap with the outcomes sought through yard setbacks.
37. The effects of concern again need to be considered in the context of the environment within which these structures are used (general rural and rural production zones), the activities they support which are anticipated in those environments (primary production) and standards that can be adopted (consistently) to manage these effects.
38. The ACPS rules proposed in the plan are not realistic and HortNZ supports the evidence of My Hodgson in this regard.

Shelterbelts

39. Shelterbelts are an inherent part of rural production, used for a number of reasons including preventing wind erosion of soils, shelter and shade for stock, and wind and weather breaks for orcharding. They can also reduce the potential for reverse sensitivity issues as they act as a barrier between properties – particularly they are an important mitigation tool for managing spray drift.
40. Generally, boundary shelter is evergreen (Internal shelter tends to be deciduous) and is around eight metres tall (or taller) once fully grown. Shelter trimmer machinery can only generally reach to around eight metres. Shelter is maintained and trimmed every 12-18 months and growers self-monitor for any gaps and dead or diseased areas.

Picture 4: The below examples are of an eight metre, highly condensed, evergreen, cryptomeria shelter. Shelter is generally less than one meter wide.



41. Shelterbelts tend to be planted on or close to boundaries to maximise the use of highly productive land and to provide weather controls and reverse sensitivity protections.
42. Growers cannot waste valuable land with poorly maintained shelterbelts and trimmings are generally removed or mulched so do not remain in the paddock or orchard as a fire source. Nor do growers want to put their operation and assets at risk of wildfire. Shelterbelt trimmings are also removed to reduce pest and disease risk so the potential for wildfire risk is also reduced.
43. There appears to be an assumption that all shelterbelts are 'generic' or 'homogenous' and generate high fuel loadings, often because of poor maintenance. However, there can be considerable variation in types of shelterbelts, and some may be more fire prone or have greater risk than others. But the provisions don't provide for any differentiation according to the nature, size, scale, or risk of a shelterbelt.
44. Modern shelter plantings tend not to be the traditional high macrocarpas row which were likely to have residue in the understorey.

CONCLUSION

45. I support the evidence of Mr Hodgson
46. It is important the district plan is future-proofed so that it is fit-for-purpose and responsive to change over its lifetime. The review of the rural provisions of the district plan is occurring in a dynamic space of change – including freshwater regulations, climate change mitigation and adaptation and national policy context in terms of matters such as food security, highly productive land, biodiversity and urban development. This highlights the importance of futureproofing the availability of resources to supply the district's growing horticulture population.
47. I support an approach that allows for horticulture growth and activities that support horticulture production.

Sarah Cameron

5 July 2024

