

**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

**STATEMENT OF REBUTTAL EVIDENCE BY LUCY CLARKE
DEVERALL FOR HORTICULTURE NEW ZEALAND**

18 SEPTEMBER 2020

QUALIFICATIONS AND EXPERIENCE

1. My full name is Lucy Clarke Deverall. I have the qualifications and experience set out in my evidence in chief.

PURPOSE AND SCOPE OF REBUTTAL EVIDENCE

2. In this rebuttal evidence I refer to the evidence of Rebecca Sanders on behalf of T&G Global Limited and Hannah Ritchie on behalf of New Zealand Pork Industry Board (**NZ Pork**).
3. The purpose of this rebuttal evidence is to highlight the importance of providing for worker accommodation to support the continued operation and development of the primary production industry in Waikato District.

PROVIDING FOR WORKER ACCOMMODATION TO SUPPORT THE OPERATION AND DEVELOPMENT OF PRIMARY PRODUCTION ACTIVITIES

4. The evidence of Ms Sanders and Ms Ritchie seek to include provision for worker accommodation with bespoke standards to manage any potential adverse effects on rural character and amenity. Both Ms Sanders and Ms Ritchie highlight that the 70m² minor dwelling is not sufficient to provide for the mix of household types that utilise farm worker accommodation. I agree and note this aligns with the commentary provided in the evidence of Ms Wharfe and my industry statement relating to seasonal worker accommodation.
5. Seasonal worker accommodation is a sub-set of farm worker accommodation but with bespoke standards that provide for non-permanent residence and larger numbers than typical family households but that meet the standards of pastoral care.
6. Ms Ritchie details how the unique operation of pig farms necessitates provision of on-site farm worker accommodation and how a shortage in skilled, willing workers results in a reliance on migrant farm workers. This is very similar to the issues dealt with by the horticulture industry as outlined in my own industry statement and in the evidence of Ms Sanders.
7. This highlights that the need for adequate worker accommodation is not just specific to horticulture but is a necessary practice for supporting primary production industries.
8. Ms Sanders comments in paragraph 7.9 of her evidence, that the s42a report recommendations regarding worker accommodation are inconsistent with the proposed strategic direction set out in the

Proposed National Policy Statement for Highly Productive Land and the Waikato Regional Policy Statement.

9. Ms Ritchie notes in paragraph 3 of her evidence that failure to provide for accommodation that reasonably services the rural production activity will not support ongoing development and investment within the district.
10. I generally agree with the comments raised. I note that while the NPS HPL is still being progressed, the values of high class soils and managing resources to support operation and development of primary production are already ingrained in the Waikato planning framework at a regional level, though to the district level in both the operative and proposed district plans. If existing and future primary production activities are to be enabled, then the critical need for farm workers to live and work on a site of the activity must be addressed.

Lucy Deverall
18 September 2020