

**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

**SUMMARY OF EVIDENCE BY LUCY CLARKE DEVERALL FOR
HORTICULTURE NEW ZEALAND**

25 SEPTEMBER 2020

1. My Industry Statement provides a horticultural perspective to the issues set out in the evidence of Mr Vance Hodgson and Ms Lynette Wharfe to assist the Hearing Panel's understanding of what is needed to support the ongoing operation and development of horticulture in the Waikato District.
2. My rebuttal statement supported parts of the evidence of Rebecca Sanders on behalf of T&G Global Limited and Hannah Ritchie on behalf of New Zealand Pork Industry Board.

Current and future horticulture in Waikato District

3. There is a range of fruit and vegetable crops grown across the Waikato District. The vegetable cropping in Waikato plays a significant role in contributing to New Zealand's domestic food supply.
4. A range of rural industries, such as packhouses and coolstores support these operations. These facilities vary in scale and size dependent on the growing operation. The majority service a number of localised farms operating as one unit under a single grower business. There are a few larger scale facilities that service farms from across the district, and from neighbouring districts. These may also service multiple businesses.
5. Due to the unique supply of high class soil in Waikato District, and mounting pressures on rural production land in other regions, there is an existing opportunity for growth of the horticulture industry in the area.

Managing resources for the on-going operation and development of horticulture

High Class Soils

6. HortNZ's preference is a non-complying status for subdivision of high class soils. This recognises that there are a range of factors contributing to the productive versatility of land and that in some instances the productivity of land may be compromised. Paragraphs 25 of my statement lists a range of factors that could be considered in an assessment of a non-complying application. However, I acknowledge that a finalised NPSHPL is likely to result in an additional plan change anyway.

Other factors contributing to productive capacity and versatility

7. There are a range of factors that contribute to the productive capacity or versatility of land in addition to soil. It is my view that Waikato District Council has a role in managing these factors in order to support the ongoing operation and development of primary production activities, as is consistent with the Waikato Regional Policy Statement. This includes:
 - *Supply of land* – controlling fragmentation and location of activities to avoid reverse sensitivity effects.
 - *Access to quality water* – controls relating to natural hazards, earthworks, vegetation removal and types of activities. Urbanisation has a direct impact on quantity and quality of water available for primary production.
 - *Access to labour and supporting infrastructure and services* – enabling operation and development of ancillary rural development (activities, buildings and structures), as well as rural industries and services. This includes suitable accommodation for farm or seasonal workers.

Reverse sensitivity and rural character and amenity

8. The versatility of productive land is significantly impacted by reverse sensitivity. This results from urban encroachment and the location of sensitive activities that are incompatible with the rural environment.
9. My statement provides examples where sensitive activities have impacted the ability to operate machinery, undertake spraying, and limited the functionality of key supporting structures. Impacts of reverse sensitivity on the viability and social licence to operate are such that it not only impacts continued operation but inhibits further development. Investment to support development of primary production is less palatable where sensitive activities are present.
10. In order to effectively manage reverse sensitivity, it is important to set clear expectations of what constitutes rural character and amenity. The new policy for rural character and amenity does not provide a full picture of horticulture in Waikato District and limits the potential for future growth by specifying farming types and locations. The policy and rule framework affords a level of priority to a number highly sensitive activities (such as childcare, education facilities and retirement villages) which is not conducive to the effective management of reverse sensitivity.

Providing for appropriate land development for continued operation and development of horticulture

There is a range of activities and development that are critical in supporting a successful horticulture industry.

Rural industry

11. Most commonly this include packhouses and coolstores, but can also include vegetable washing facilities. There is a functional and operational need for these activities to locate in proximity to cropping areas as time delays between harvesting, storing and market destination can have significant impacts to product quality, resulting in economic losses to growers.

Seasonal worker accommodation

12. It is HortNZ's position that worker accommodation in rural production zones is required to support food production activity. Central Government requires those employing seasonal workers to provide purpose built accommodation and a duty of pastoral care. Exemptions from providing accessible facilities and guidance on design can mitigate concerns around the potential for further fragmentation of land. Accommodation for seasonal workers needs to be located in proximity to rural production activities. Not only is it more efficient, but it reduces other impacts to the wider community by minimising vehicle movements and freeing up housing supply. My rebuttal supports the evidence of Ms Sanders and Ms Ritchie as these highlight the need for a range of worker accommodation facilities and demonstrate the need is not just specific to horticulture. My view is that these facilities have a functional and operational need to locate in the rural zone that is greater than most sensitive/community activities.

Artificial crop protection structures

13. Many growers have become reliant on these structures to enhance quality and yield to meet increasing market demand. They provide a range of benefits including protection from sunburn, windburn, hail, frost and birds, assistance with spray coverage, reduced mowing and weeding, assisting pruning and picking. It is often necessary to build up to the boundary

to maximise coverage and use of productive land. Height is necessary to allow machinery and plant growth. The structures generally consist of boundary poles and permeable netting on vertical and horizontal sides. Netting on horizontal surfaces must be white to allow enough light to support healthy plant growth. Green or black is commonly used on vertical sides to reduce glare and minimise visual impacts. HortNZ seeks these be excluded from building coverage, setback and daylight angle controls. These structures have a functional and operational need to locate in rural environments that is greater than most sensitive/community activities.

Building setbacks generally

14. Horticulture is limited in where it can locate due to a reliance on land classed LUC 1 – 4. Given the limited supply of versatile, productive land suitable for horticulture, cropping and planting generally occurs as close to the boundary as possible in order to maximise use of productive land. For practical and operational reasons, it is preferable to locate buildings and structures closer to the boundary. The setbacks in the PWDP and s42a report would render the majority of productive land, unusable.

Biosecurity

15. In the event of a biosecurity incursion of an unwanted organism, a rapid response to manage spread is necessary. Vegetation removal, burial, burning, spraying of material are methods that may be used, including in riparian areas. Given the urgency required, it is not practical to have to obtain resource consents. The proposed plan needs to include provisions to address this matter.

Lucy Deverall
25 September 2020