

**UNDER**

the Resource Management Act 1991  
(“**RMA**”)

**IN THE MATTER**

of Waikato District Plan Review– Hearing 18  
Rural Zone.

**SUMMARY STATEMENT OF REBECCA NANCY ANKA SANDERS ON BEHALF OF T&G  
GLOBAL LIMITED**

**[Submission 676, Further submission FS1171]**

**[PLANNING]**

**1. INTRODUCTION**

- 1.1 My full name is Rebecca Nancy Anka Sanders. I hold the position of Associate/Consultant Planner at Barker & Associates Limited and my qualifications and experience are as set out in my Evidence in Chief (**EIC**) dated 8 September 2020.
- 1.2 My evidence has been prepared in support of submissions from T&G which seek amendments to the definition of “Farming” to enable the ability to undertake processing of primary produce which is non ancillary to the site. Amendments are also sort to the Rural Zone provisions to enable workers accommodation.
- 1.3 T&G is one of the largest growers of fresh produce in New Zealand servicing both domestic and international markets. T&G undertakes horticultural activities within the Waikato District including growing under glass house cover, packing depots, transport the accommodation of horticultural workers and general administration and office functions. T&G employs seasonal workers nationwide including within the Waikato District and is a Recognised Seasonal Employer.

**2. STRATEGIC DIRECTION FOR PRIMARY PRODUCTION**

- 2.1 My Evidence in Chief sets out the strategic direction for rural production within the Waikato. Both the proposed National Policy Statement for Highly Productive Land (NPS – HPL) and the Waikato Regional Policy Statement (RPS) seek to support operation and development of primary production.
- 2.2 The Waikato Regional Policy Statement (RPS) sets the strategic direction for rural production within the Waikato and seeks to provide for the continued operation and

development of primary production activities (Policy 4.4). The value and long-term benefits of primary production activities which support regionally significant industry are also recognised (Policy 4.4 (b)). This policy direction is also ingrained in the operative Waikato District Plan both the Franklin and Waikato Sections.

- 2.3 To implement this policy direction the Waikato District Operative Plan enables *Productive Rural Activities* as a permitted activity, which includes the processing of primary products. Likewise, the Franklin District Operative Plan enables *On Site Primary Produce Manufacturing* as a permitted activity, which includes the processing of primary products where the produce is from sites within the same ownership (or leased by the owner) and not exceeding 100m<sup>2</sup> in area for agricultural produce and 500m<sup>2</sup> in area for all other produce. The Franklin District Operative Plan also provides for subsidiary dwellings, to support farming and horticulture by accommodating employees or seasonal workers engaged in farming or horticulture activities, as a restricted discretionary activity.

### **3. DEFINITION OF “FARMING” AND THE PROVISION FOR PROCESSING OPERATIONS**

- 3.1 My evidence in chief supports amendments sought by T&G to the definition of “Farming” to allow for the processing of produce grown on other sites leased by the same owner<sup>1</sup>.
- 3.2 Processing operations are a fundamental part of the network of activities that support primary production and therefore should be provided for within the rural environment. While I acknowledge that large scale processing operations may result in effects which will be more appropriately managed through the resource consent process, the permitted threshold needs to adequately reflect the scale of operation. This is to ensure rural areas are productive and enabling rural production activities.
- 3.3 The Council’s proposed definition of “Farming” puts the emphasis on whether a processing activity is permitted or not on the ancillary nature of that processing operation. This is inefficient for producers who grow produce on dispersed sites and is not effective as it does not reflect the scale of effects associated with an operation. In my view a more efficient and effective approach for distinguishing between what is a small or large-scale processing operation is relying on the land use and bulk and location rules of the Rural Zone. Processing activities which comply with the rules for

---

<sup>1</sup> Submission 676.5

the Rural Zone will be of a scale anticipated within the rural environment. Where an operation infringes these rules, this is an indication that the scale of activity may result in effects which need to be assessed as a discretionary activity through the resource consent process. Therefore, as set out within paragraph 7.5 of my EIC I support deleting “*as an ancillary activity*” from subclause (a) of the definition of “Farming”.

- 3.4 Within rebuttal evidence the Council has raised concerns that this approach to processing activities does not control the appropriateness of the activity occurring within the building, the traffic it generates through staffing and freight, or amenity effects related to the scale or intensity of the activity. In my view effects on the general amenity caused by the processing facility will be controlled by the noise and light standards that apply within the Rural Zone. The effects associated with traffic movements are controlled by proposed Rule 14.12.2 (P4) – Traffic Generation for Permitted Activities within the Transportation Chapter. This rule limits traffic movements for permitted activities in the Rural Zone to 200 vehicle movements a day, of which no more than 15% are heavy vehicles.

#### **4. PROVISION FOR WORKERS ACCOMODATION**

- 4.1 My evidence in chief supports amendments sought by T&G that seek to make specific provision for worker accommodation in the rural environment up to 120m<sup>2</sup> for workers engaged in rural production activities<sup>2</sup>.
- 4.2 In my opinion the provision for workers accommodation within the rural environment is consistent with the higher order policy direction of the RPS set out in paragraph 6.4 of my EIC which, seek to support the primary sector and provide for the continued operation and development of primary production activities. The horticultural sector requires access to labour and the provision, where necessary, of farm workers’ accommodation that addresses permanent and seasonal worker accommodation needs. Workers accommodation is a bespoke type of accommodation that has a different role to a dwelling, and ensures the ongoing productivity of the primary sector. The sector’s needs are well recognised and provided for in rural production areas throughout the country.
- 4.3 This rule should be largely consistent with the proposed rule for minor residential units however, it should provide for a larger gross floor area. This is to recognise that workers accommodation is often of a more communal/dormitory style. In my view it

---

<sup>2</sup> Submission 676.17

should also be a prohibited activity to subdivide workers accommodation from the site on which the principal residential unit is located.

- 4.4 Within rebuttal evidence the Council has proposed amendments to the minor dwelling rule to effectively widen this to accommodate workers accommodation. I agree that the proposed amendments will appropriately provide for workers accommodation.

**5. Conclusion**

- 5.1 My evidence concludes that the proposed amendments to the definition of “Farming” and the Rural Zone provisions as they relate to workers accommodation is a more appropriate method for achieving the purpose of the RMA. These proposed amendments are consistent with the higher order objectives of the RPS.

**Rebecca Nancy Anka Sanders**

**29 September 2020**