

12 April 2019

Western Bay of Plenty Regional Council
Barkes Corner
Greerton
Tauranga 3143

Via email to Fiona.Low@westernbay.govt.nz

Dear Fiona

Re: Review of Post-Harvest Zones and Accommodation for Seasonal Workers

Please find attached a submission on the Western Bay of Plenty Council's recommendations for the review of the Post-Harvest Zones and Seasonal Accommodation in relation to the District Plan.

Please do not hesitate to contact me if you require any further information on this submission.

Yours sincerely



Sarah Cameron
Senior Policy Analyst

TO: Western Bay of Plenty District Council

SUBMISSION ON: Review of Post-Harvest Zones and Seasonal Accommodation

NAME: New Zealand Kiwifruit Growers Incorporated (NZKGI)

ADDRESS: PO Box 4246, Mount Maunganui South 3149

1. Background to NZKGI

NZKGI was formed in 1993 to give kiwifruit growers their own organisation to develop a secure and stable kiwifruit industry. NZKGI represents 2,600 kiwifruit growers and gives growers their own voice in industry and government decision making. NZKGI works to advocate, protect and enhance the commercial & political interests of New Zealand kiwifruit growers.

2. The kiwifruit industry in the Bay of Plenty Region

Approximately 80% of New Zealand's kiwifruit crop is grown in the Bay of Plenty providing a significant contribution to the Bay of Plenty regional economy, with \$1.18 billion in revenue being generated for the region in 2017/2018. The industry provides significant employment to the Bay of Plenty Region employing 10,762 FTE in the year 2015/2016¹. Zespri, the kiwifruit marketer, has committed to more than double global sales revenue to \$4.5 billion by 2025. The projected growth of the industry will contribute significantly to the Bay of Plenty GDP increasing it by 135% to \$2.04 billion by 2029/2030¹. Employment in the kiwifruit industry is also expected to increase by 133% to 25,091 FTE by 2029/2030¹.

There are 2,582 orchards in the Bay of Plenty with an average size of 4.46ha.

Thank you for the opportunity to provide comments on the District Plan review of post-harvest zones and seasonal worker accommodation. NZKGI comments reflect feedback from growers, contractors and post-harvest operators.

3. Post-harvest zones

Operation and further development of post-harvest zones

NZKGI agrees that extending post-harvest zones to reflect property purchase or boundary adjustments and increasing post-harvest zones where future projects are planned is the most appropriate solution. This provides certainty to post-harvest operators and allows for future growth to take place without the requirement of obtaining a consent.

Permitted height

The current permitted height in the post-harvest zone is 12m. There needs to be sufficient infrastructure in place to support industry growth and 12m is no longer a realistic height provision. With the introduction of automated cool store racking, cool stores are increasingly extending in height. Add to this the competition for land due to urban sprawl and it makes sense for height restrictions to be elevated to a level that will sustain growth over the next 10 years. Postharvest companies have advised NZKGI that they support a 20m height restriction with the ability to apply for a resource consent over and above this.

NZKGI also supports height provisions be extended to facilities outside of post-harvest zones. There are cool stores attached to packhouses that are used for kiwifruit storage and other cool stores throughout the region that would not be in post-harvest zones.

On-site seasonal worker accommodation

On-site seasonal worker accommodation for a maximum of 75 people is currently a permitted activity in the post-harvest zone. Some facilities are already planning to have close to 200 beds in the near future - therefore to future proof, NZKGI supports extending this to at least 300. Labour requirements to meet industry demand is only going to increase as the industry expands and grows. Providing certainty to post-harvest will help to alleviate current accommodation shortages across the Bay of Plenty region. NZKGI would like to understand what risks exist that the Council would need to manage for this extension. This may further inform our view.

4. Seasonal Worker Accommodation

On-site camps

NZKGI supports Activity Performance Standards for on-site camps to be established within rural zones with the following exceptions:

Proposal: On-site camps are temporary and permitted only in weeks 16-20 (between March & June each year) for a maximum of a continuous four-week period

For the 2019 season, harvest started week 11 and will likely continue through to weeks 24-26. Allowing on-site camps from weeks 16-20 for a four-week period would be insufficient. Further to this, there are other peak labour periods during the year, such as winter pruning, that require short term workers. NZKGI supports temporary on-site camps to be allowed at any point during the year for a maximum of a continuous four-week period. We suggest this could be restricted to a maximum of four times per year to allow for the main peak period for labour.

Proposal: On-site camps are made up of non-permanent structures that are removed from the site within a week of the four-week period of use

NZKGI needs to understand the reasoning for removing the structures - what risks is the Council managing by requiring this? Accommodation is likely to be required throughout the year at the same site, therefore it would be reasonable to expect that any type of structure would be allowed to remain.

Proposal: Do not charge rent, hire, donation, or otherwise for reward (Charging a fee requires more onerous rules as the site would be treated as an official camping ground)

There should be some provision for the owner to be able to apply a charge to cover their expenditure but does not trigger the definition of operating as a campsite. NZKGI needs to better understand the restrictions around operating a campsite which need to be avoided. To support the temporary campsite, owners may wish to install permanent facilities such as kitchen facilities and toilet blocks and it is reasonable to expect operating costs could be recouped.

Seasonal worker accommodation in industrial zones

NZKGI supports investigation by Council into considering seasonal worker accommodation to be provided for in an industrial zone. If the industrial zone is in close proximity to the place of work it is our recommendation that we should be maximising all opportunities to accommodate seasonal workers.

Additional capacity for seasonal worker accommodation

NZKGI supports Council's recommendations to supply additional capacity for seasonal worker accommodation:

- All operational pack houses (that have the appropriate consents) should be zoned post-harvest so they can accommodate seasonal workers on site
- Retrofitting of existing unused pack houses or other buildings would be of benefit in helping to reduce the lack of seasonal worker accommodation in the Western Bay of Plenty
- A rule should be created for pack-houses not in post-harvest zones that allows onsite seasonal worker accommodation up to a specified limit

Seasonal worker accommodation in rural and residential zones

NZKGI supports seasonal worker accommodation in rural zones. This means workers are located in close proximity to their place of work and reduces the number of vehicles on the road.

Providing seasonal accommodation in residential zones should be considered carefully. Using existing rental stock for seasonal accommodation puts pressure on already overstretched rental market. Further to this the industry has legitimate concerns around Council's interpretation of building code compliance which remains a barrier for converting existing buildings to seasonal accommodation.

Seasonal workers accommodation requirements

Feedback from seasonal workers shows that they feel safer being accommodated in larger numbers and want to be accommodated close to their place of work but within easy reach of town facilities.

5. Overall comments

NZKGI commends the Council for engaging and willingness to work with the industry on these issues. NZKGI asks that a pragmatic approach is taken when considering final options.

6. Further discussion

NZKGI welcomes further discussion with the Council on the proposed district change.