

Summary of Submissions Received – Variation 7

Seasonal Workers Accommodation

The following table provides a summary of the submissions received on Proposed Variation 7 to the Proposed Hastings District Plan. The summary has been prepared in accordance with Clause 7(1) in Schedule 1 of the Resource Management Act 1991.

Sub No	Submitter Name	Contact Details	Submission Type	Plan Sections	Summary of Submission Points	Relief Sought
1	Diane Joyce	305 Lovedale Rd Hastings 4120 joycecommunications@outlook.com	Support		<p>1. Directly relates to management of activities on the land.</p> <p>2. Landowners will logically choose least useful land.</p> <p>3. Positive effect on districts housing resource.</p> <p>4. Ensure the pastoral care of workers.</p> <p>5. Buildings need to be removable.</p>	<p>Only be provided for on RSE accredited properties and removed if accreditation ceases.</p> <p>Place conditions on pastoral care provisions.</p>
2	Bruce Stephenson Family Trust & Stephenson Transport Ltd	41-43 Ruataniwha Street Waipawa 4120 hugo@stephensontransport.co.nz	Support in part and oppose in part	Policy IZP17B & Rule 14.1.6A.10	<p>1. No attempt made to ensure that the objective of allowing for camp style seasonal workers can be met.</p> <p>2. Section 32 does not take into account the wastewater discharge limit at Irongate.</p> <p>3. Rule 14.1.6A.10 will make it highly unlikely that large scale seasonal workers camps will be built.</p> <p>4. At Irongate Council seems to have selected the type of wastewater reticulation first and then imposed restrictions on the type of activities which is the wrong way around.</p>	<p>Change Rule 14.1.6A.10 to read 1.12 litres per second per area of site.</p> <p>Change the wording of the explanation to Policy IZP17B to read “The infrastructure capacity of the Irongate Industrial Zone is not designated for activities which produce large volumes of wastewater. However there is sufficient capacity for other uses, including large scale (200to 300 persons per site) seasonal workers accommodation and</p>

						this is applied as a performance standard within the zone. This might mean that the ability to fully develop the site may need to be sacrificed is seasonal workers accommodation is to be constructed."
3	Jan Sutherland	174 Twyford Road Hastings 4175 jan.sutherland3@gmail.com	Oppose	Policy PPP5	<p>1. Only allow RSE on industrial land where there is infrastructure to service it.</p> <p>2. 80 workers will create substantial volumes of wastewater not compatible with areas which obtain drinking water from private wells.</p> <p>3. Rubbish generated and the effects on road network also needs to be considered.</p>	Limit RSE housing to industrial land that has the appropriate services to handle the environmental effects.
4	John Roil	PO Box 2543 Stortford Lodge, Hastings 4153 john@pmhb.nz	Supports with amendments	Sections 6.2, 7.5, 14.1 and 33.1	<p>1. Sites less than 12ha are suitable for RSE accommodation.</p> <p>2. Accommodation for more than 80 should be provided for where services could be provided in an adjoining zone.</p> <p>3. Purpose Built facilities should be provided for in the Plains Zone.</p> <p>4. Soil quality should form part of the assessment criteria.</p>	<p>1.Allow RSE accommodation on sites less than 12ha.</p> <p>2. Accommodation for more than 80 should be provided for where services could be provided in an adjoining zone.</p> <p>3. Purpose Built facilities should be provided for in the Plains Zone.</p>

					<p>5. Enable poor quality plains land to be linked with Industrial land with services.</p> <p>6. Upgrade wastewater infrastructure at Irongate to support RSE accommodation.</p> <p>7. Reduce 10m² per person outdoor recreation standard.</p>	<p>4. Soil quality should form part of the assessment criteria.</p> <p>5. Enable poor quality plains land to be linked with Industrial land with services.</p> <p>6. Upgrade wastewater infrastructure at Irongate to support RSE accommodation.</p> <p>7. Reduce 10m² per person outdoor recreation standard.</p>
5	Turners & Growers NZ Ltd	PO Box 279, Hastings 4156 Rebecca.blunden@tandg.global	Support with amendments		<p>Supports the intent of the variation but seeks further changes that will allow for the more practical and efficient operation of their accommodation facilities.</p>	<p>1. Amend the definition of residential activity to allow 10 or 12 seasonal workers per site.</p> <p>2. Amend the activity status for seasonal workers accommodation in the Omahu and Irongate General Industrial zones to be permitted or controlled activities.</p> <p>3. Provide for seasonal workers in the Whakatu General Industrial Zone.</p>
6	Chris Lambourne & Brenda Armstrong	1001 Rata Street, Hastings cw.lambourne@gmail.com	Oppose		<p>1. The technical and legal approach to allowing additional</p>	<p>There should be a requirement for Management Plans for</p>

				<p>housing for seasonal workers is not being commented upon.</p> <p>2. Specific provision for the social support of RSE workers must be put in place. If this does not occur social issues will flow into the Hastings District.</p> <p>3. RSE workers are a compliant workforce and will not voice the issues they face. Issues include isolation from facilities such as shopping, banking and attending training courses and also social interaction including the ability to attend church. Other social issues include sickness and injury, personal safety, and stress.</p> <p>4. Risk of accommodation being used for general housing stock down the line resulting in marginalised people.</p> <p>5. There is an opportunity for raising special development charges that would be used for RSE social support.</p> <p>6. Recreational needs should be recognised in the Plains zones as well as the Industrial zone.</p> <p>7. The opportunity exists for HDC to develop mechanisms that can address social and pastoral issues</p>	<p>6 people and over, and they should be monitored.</p> <p>Apply developer levies or special rates to buildings permitted for seasonal workers with the money going to social support of workers, including the appointment of social workers specific to RSE workers.</p> <p>Outdoor recreation standards should be applied to seasonal workers accommodation in the Plains Zone.</p>
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7	Johanna Croskery	352 Twyford Road, Hastings jocroskery@gmail.com	Oppose in part		<p>1. Oppose the building of RSE Accommodation on primary production land. The loss of versatile land is of serious concern.</p> <p>2. The number of people will have a substantial impact on the environment eg wastewater , rubbish and the traffic on the roads.</p> <p>3. What impact will RSE have on property values?</p> <p>4. The noise from 75 people living in close proximity is of concern.</p> <p>5. Will the buildings and the care of the workers be monitored?</p>	Keep this housing to light industrial areas and not on prime horticultural land.
8	Hawke's Bay Fruitgrowers Association Inc.	PO Box 689 Hastings 4156 office@hbfruitgrowers.co.nz	Support		<p>1. Agree with the summary and conclusions in the Section 32 Evaluation.</p> <p>2. Has an added benefit of providing for the social wellbeing of the wider community through reducing pressure on the existing rental housing resource.</p>	Seek that the variation be accepted in full
9	Navilluso Holdings Ltd and Longlands Properties Ltd	PO Box 2308, Stortford Lodge, Hastings ben.hamelink@tumu.co.nz	Support with amendment	Section 14.1 General Industrial Zone	<p>1. Support seasonal workers accommodation being a restricted discretionary activity in the Irongate Industrial Zone with tighter performance standards put in place.</p> <p>2. Quality of the accommodation should be of a high standard to</p>	<p>Seek an amendment to Specific Standard and Term 14.1.7.9 (changes shown in italics)</p> <p>c) All buildings which are part of the seasonal</p>

					<p>ensure industrial uses can be attracted to the zone.</p> <p>3. The potential conflict between industrial and residential activities needs to be well managed.</p>	<p>workers accommodation shall be <u>newly constructed</u> relocatable buildings or <u>new buildings with the ability</u> to be reconfigured to an industrial purpose.</p> <p>d) <u>Seasonal workers accommodation shall not be used for emergency housing or any other accommodation other than for the seasonal workforce which specifically serves the primary production industry.</u></p> <p>e) <u>Appropriate screening shall be constructed within the boundaries of seasonal workers accommodation to limit reverse sensitivity effects and ensure that the ability of adjoining industrial activities to continue their day to day activities is not compromised.</u></p>
10	Hawke's Bay Regional Council	Private Bag 6006, Napier 4110 ellen.humphries@hbrc.govt.nz	Generally supports		<p>1. Acknowledgement and consideration of potential risks to the unconfined aquifer and the Hastings drinking water</p>	<p>We request that Hastings District Council include advice notes highlighting the need for applicants to</p>

					<p>source protection zone is required.</p> <p>2. The potential contamination issues are not only from the built form but also from the density of people on site. Ideally HBRC would like HDC to extend reticulated systems to service RSE developments.</p> <p>3. It is an opportune time for HDC to ensure that any changes made through the variation align with the proposed TANK Plan change in so far as is practical.</p> <p>4. It is uncertain whether seasonal workers accommodation drinking water needs will be met by municipal supply or on-site provision.</p>	<p>seek resource consents from the Regional Council in regards to wastewater and stormwater discharges.</p> <p>Provide wording in 14.1.8.4 similar to that within TANK Policy 6b)</p> <p>Include an advice note highlighting that applicants may need to transfer an existing permit or provide drinking water within consented applications, and that the provision of drinking water will need to meet the requirements of the NZ Drinking Water Standards and Health Act.</p>
11	A& J Maurenbrecher & others	Proarch Consultants Ltd amanda@proarch.co.nz	Opposes the changes		<p>The Proposed Variation does not address whether the Plan objectives and policies continue to give effect to the RPS. The Section 32 Assessment should reflect the underlying land in terms of the appropriateness of the alternative assessment.</p>	<p>Decline the proposal in its entirety.</p> <p>Failing the proposal being declined, amend the text inclusive of consequential changes and definitions, to enable existing undersized PPZ lots of inferior soils to be utilised for seasonal workers accommodation, and for other</p>

						accommodation purposes in the offseason.
12	Horticulture New Zealand	View Consultants Ltd PO Box 239 NAPIER 4140 charlotte@viewconsult.co.nz	Generally Support with clarifications		<p>Horticulture NZ is supportive of Variation 7 as it addresses an issue that it critically important to the prosperity of the horticulture industry within the district and region. The following matters require some clarification.</p> <ul style="list-style-type: none"> • Do the seasonal worker accommodation changes apply to the Rural Zone? • Clarify the activity status for seasonal worker accommodation that exceeds 80 people in the Plains Production Zone. • Clarify whether a limit on the number of residents in the general industrial zones is intended. • The activity status for seasonal workers accommodation that does not meet the performance standards on the light industrial zone should be discretionary. • The justification for the 125m² floor limit for permitted activity status in the Plains Production 	<p>Support the 8 worker maximum for the number of seasonal workers allowed for the in the definition of residential activities.</p> <p>Provide for the amendments proposed for seasonal workers in the Plains Production zone, in the Rural Zone.</p> <p>Increase the GFA permitted activity threshold from 125m².</p> <p>Delete the minimum 12 ha site size requirement in the Plains Production Zone.</p> <p>Amend the activity status of restricted discretionary activities that do comply with the standards from non-complying to discretionary.</p> <p>In the light industrial zone set a limit of 300 workers. Where standards cannot be complied with this</p>

					<p>zone is not evident and an increase would help to address the capacity problem.</p> <ul style="list-style-type: none"> The assessment criteria (a) (b) (d) and (h) for seasonal workers accommodation in the Plains Production zone allows the effects on the soils to be considered thereby avoiding the need for the 12ha minimum. 	<p>should fall to discretionary.</p> <p>Set a limit of 300 workers for seasonal workers in the General Industrial Zone.</p>
13	Robert Griffiths	5 Evans Road, RD5 Hastings, 4175 r.griffiths@airnet.net.nz	Oppose	Section 6.2	<p>Oppose the provision for RSE accommodation on rural horticultural appeal.</p> <p>This type of development requires on site sewer systems that could impact on the aquifer. They also result in create adverse noise effects on adjacent rural and lifestyle properties.</p> <p>They should not be used for other commercial purposes.</p> <p>RSE accommodation is better suited to industrial areas so that they can connect to infrastructure, where noise is not a problem, and horticultural land can be saved for production.</p>	<p>That large scale seasonal worker accommodation is not permitted on rural land and that they be redirected to industrial or similar zones where infrastructure can be provided.</p>

14	Surveying the Bay	PO Box 611, Hastings 4156 info@surveyingthebay.co.nz	Support with amendment	Section 6.2	<p>The current 125m² floor limit has worked well providing for up to 20 workers as a permitted activity. Changes in the Department of Labour sleeping area minimums mean that the number of people allowed for a as a permitted activity will reduce by around one third.</p> <p>Support rule PP23 allowing for up to 80 workers as a restricted discretionary activity, but feel that an anomaly has arisen where accommodation exceeding the footprint by as small margin eg 250m² and not meeting the 12 ha minimum site size, would be non-complying.</p>	<p>That the 125m² gross floor area limit (PP9) be increased to 200m².</p> <p>That an additional Restricted discretionary activity category be provided for allowing for RSE accommodation for up to 40 workers on a site between 6 and 12 hectares.</p>
15	Victor Saywell	31 Stock Road, RD5 Hastings 4175 saywellvandh@gmail.com	Support with amendment		<p>Seasonal workers accommodation needs to be available in sensible locations and the suitability of the management considered.</p> <p>It should be fit for purpose and include accessibility to recreational, shopping and community needs of workers.</p> <p>Accommodation costs should be subject to limits.</p> <p>Regular inspections on facilities and workers wellbeing are needed.</p> <p>In the Plains Zone 2500m² gfa should not be exceeded when</p>	<p>That decisions made should support wellness for workers and activities shall comply with rules in line with the purpose for which they are approved.</p> <p>That poor operators are brought into line or lose the ability to operate.</p>

					combined with other buildings. Facilities should relate to primary industries on site or nearby.	
16	Greg Honor, Omaha Land Trust & Irongate Way Ltd	58 Equestrian Lane, Hastings gphonor@gmail.com	Oppose	Irongate General Industrial	<p>Providing for Seasonal Worker Accommodation in the Irongate General Industrial Zone will be detrimental to future investment.</p> <p>More information is required on how reverse sensitivity is to be addressed.</p> <p>Rule GI9A which allows for seasonal workers accommodation as restricted discretionary activity, should not be implemented without better consultation.</p> <p>Wording around Rule GI16 needs to be clarified.</p> <p>There should be no opportunity to change the use of seasonal worker accommodation in the future.</p>	<p>New proposals should consider reverse sensitivity as a priority and location options on large sites need to be planned to minimise neighbouring impact.</p> <p>A combination of planting and instant perimeter shielding in high visibility areas should be implemented.</p> <p>Accommodation could only be considered on the periphery of an industrial area.</p> <p>Set guidelines to ensure the development cannot proceed without reverse sensitivity considerations.</p> <p>Do not include rule GI9A (allowing for seasonal workers accommodation) without more specific inclusions.</p>

						Re-word Rule G116 so that the intent is appropriate for the services available.
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