
Proposed Hastings District Plan

Proposed Variation 7: Seasonal Workers Accommodation

Section 32 Summary Evaluation Report

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1 Introduction

1.1 Purpose of this Report

This report presents the summary evaluation of proposed Variation 7 to the Proposed Hastings District Plan (Proposed Plan), in accordance with Section 32 of the Resource Management Act 1991 (RMA).

Proposed Variation 7 provides for a greater level of certainty around seasonal worker accommodation within the Plains and Industrial zones of the Proposed District Plan.

This report is required to accompany proposed Variation 7 at the time of public notification under Schedule 1 of the RMA.

1.2 Outline of Proposed Variation 7 to the Proposed Hastings District Plan

Seasonal workers accommodation is currently provided for in the Proposed District Plan however it is the scale of this resource that has changed significantly since the proposed plan was notified. As a medium growth authority Council must take into account its obligations under the National Policy Statement for Urban Development Capacity to provide for sufficient land capacity to meeting its housing demands. Part of meeting these demands is ensuring that the different accommodation needs of the district are provided for. The demand for workers to service the horticulture industry cannot be met by the local workforce and therefore workers from overseas largely fill this deficit. These workers must be housed and the demand for seasonal worker accommodation has placed significant strains on the districts existing rental housing stock. There is a local housing shortage with never before encountered numbers of people relying on emergency housing, through the Ministry of Social Development.

The provisions associated with this variation will provided certainty to the providers of seasonal workers accommodation. Certainty around the process that is to be followed and the information that is required to be lodged, is what the stakeholders have advised Council is required.

The Proposed Variation sets out to amend the provisions of the Plains Production Zone and the General and Light Industrial Zones (Sections 6.2, 7.5 and 14.1) to provide for a wider range of workers accommodation in recognition of the special needs of the recognised seasonal employers (RSE) scheme. Currently the plan provisions for on-site workers accommodation does not meet the scale of development required by the industry. This has resulted in seasonal and RSE workers accommodation needs being provided for in the residential environments with consequential impacts on the residential rental market. The Variation also proposes a change to the definition of residential activity to clarify the scale of seasonal workers accommodation that is appropriate in the residential zones.

In summary, the proposed variation involves:

- i) Reviewing the policy for seasonal workers accommodation
- ii) Reviewing the activity status for seasonal workers accommodation
- iii) Reviewing the standards and terms and assessment criteria for seasonal workers accommodation.
- iv) Consequential amendments to the Proposed Plan.

2 Section 32 Evaluation Requirements

Clause 5(1) of Schedule 1 of the RMA, requires preparation of an evaluation report for any proposed plan (including any proposed variation to a proposed plan) in accordance with

section 32, and for Council to have particular regard to that report when deciding whether to proceed with the statement or plan.

Section 32 evaluations effectively ‘tell the story’ of what is proposed and the reasoning behind it. The Section 32 evaluation aims to communicate the thinking behind the proposal to the community and to decision-makers. The evaluation also provides a record for future reference of the process, including the methods, technical studies, and consultation that underpin it, including the assumptions and risks.¹

An evaluation report is required to examine both:

- the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA (s32(1)(a)); and
- whether the provisions in the proposal are the most appropriate way in which to achieve the objectives in terms of their efficiency and effectiveness by identifying other reasonably practicable options for achieving the objectives; assessing the efficiency and effectiveness of the provisions in achieving the objectives; and summarizing the reasons for deciding on the provisions (s32(1)(b)).

The evaluation report must contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal (s32(1)(c)).

Such an evaluation must take into account:

- the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment that are anticipated to be provided or reduced (s32(2)(a)) and, if practicable, quantify them (s32(2)(b)); and
- the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions (s32(2)(c)).

In this case, proposed Variation 7 (the proposal) does not, for the main part, contain ‘objectives’. Therefore, pursuant to section 32(6), ‘objectives’ in this setting relate to ‘the purpose of the proposal’, which is:

Purpose of the Proposal:

To provide for the accommodation resource needs for seasonal workers to assist with, and at the same time protect, the sustainable management of the natural and physical resources of the Heretaunga Plains and reduce the pressure on the existing residential rental stock.

Similarly, the ‘provisions’ to be evaluated are essentially:

Provisions:	i) the Plains Production zone provisions as they relate to seasonal worker accommodation activities;
	ii) The Light Industrial and General Industrial Zone provisions as they relate to seasonal worker accommodation activities;
	iii) The proposed amendment to the definition of ‘residential activity’ to specifically include seasonal

¹ Ministry for the Environment. 2014. *A guide to section 32 of the Resource Management Act: Incorporating changes as a result of the Resource Management Amendment Act 2013*. Wellington: Ministry for the Environment.

workers accommodation for up to 8 persons within residential zones .

The first part of the evaluation has to address whether the purpose of the proposal, as set out above, is the most appropriate way to achieve the purpose of the RMA.

Secondly, the evaluation must consider whether the provisions are the most appropriate way to achieve the purpose of the proposal, by identifying other reasonably practicable options for achieving the purpose, assessing the provisions' efficiency and effectiveness in achieving the purpose, and must summarise the reasons for deciding on the provisions.

The following evaluation fulfils Council's statutory obligations under Clause 5(1) of Schedule 1 of the RMA, in accordance with section 32, for proposed Variation 7 to the Proposed Plan.

3 Statutory Basis for Seasonal Workers in the District Plan

Section 74 of the RMA outlines the requirements for District Councils in terms of the preparation of, and any change to, their district plan in accordance with their functions under section 31 and the provisions of Part 2 of the RMA.

3.1 Part 2 (Purpose & Principles) of the RMA

Managing the provision for long term land-use and infrastructure aligns closely with the purpose of the RMA, which is *‘the sustainable management of natural and physical resources’*. Section 5 of the RMA defines ‘sustainable management’ as:

“managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety, while:

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations;***
- (b) Safeguarding the life-supporting capacity of air, water, soil and ecosystems; and***
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.”***

Proposed Variation 7 directly relates to section 5 in that it seeks to make provision for seasonal workers accommodation so that workers are available to assist with the management of land that is used for primary production purposes. Part 2 requires that this occurs in a way and at a rate which enables people and communities to provide for their social, economic and cultural wellbeing, and meeting the reasonably foreseeable needs of future generations; safeguarding the life-supporting capacity of air, water, soil and ecosystems; and addressing adverse effects on the environment. As a result Variation 7 protects the versatile land of the Plains Production zone from large scale seasonal workers accommodation facilities by making any development over 80 workers a non-complying activity. There are no matters of National Importance under Section 6 of the RMA that need to be taken into account in the Section 32 Report.

Section 7 identifies other matters requiring particular regard. Of particular relevance are:

- b) the efficient use and development of natural and physical resources;***
- ba) the efficiency of the end use of energy;***
- c) the maintenance and enhancement of amenity values;***
- f) maintenance and enhancement of the quality of the environment;***
- g) any finite characteristics of natural and physical resources.***

The purpose of Variation 7 is to ensure that the versatile land resource that significantly contributes to the base of the Hastings District economy can operate in an efficient manner. Being unable to appropriately provide for the accommodation needs of workers means that the sustainable management of the land will not be achieved and the community will be less able to provide for its social, economic and cultural wellbeing.

Seasonal and RSE accommodation has a direct influence on housing availability within the Hastings District. The season requires workers for up to 8 months of the year and this impacts on the established rental housing market. Variation 7 will facilitate the provision of purpose built seasonal and RSE worker accommodation thereby taking pressure off the existing residential rental market.

The functions of the District Council in section 31 of the RMA also provide a clear mandate for addressing the integrated management of natural and physical resources in a District Plan.

In particular:

-
- “(1)(a) the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district:***
- (aa) the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district.***
- (b) the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of—***
- (iia) the prevention or mitigation of any adverse effects of the development, subdivision, or use of contaminated land:***
- ...
- (d) the control of the emission of noise and the mitigation of the effects of noise:***
- (2) the methods used to carry out any functions under subsection (1) may include the control of subdivision.”***
-

Proposed Variation 7 expressly seeks to establish and implement plan provisions to achieve integrated management of the versatile land of the Heretaunga Plains.

The variation will also indirectly assist in achieving the objectives and policies that relate to ensuring that there is sufficient development capacity to meet the housing needs of Hastings District as a medium growth authority under the National Policy Statement for Urban Development Capacity. Better provision for seasonal worker accommodation is likely to result in less pressure being put on traditional residential rental property. However the variation also includes rules that assist in ensuring that land is used in the most efficient and effective manner. While there is a need to provide for on-site seasonal worker accommodation the effects on the versatile soil form part of the assessment criteria, to ensure that loss of versatile land is avoided to the extent practicable.

3.2 Hawke’s Bay Regional Policy Statement

In addition, Section 75 of the RMA states that a district plan ‘*must give effect to*’ any regional policy statement (RPS).

The Key Regional Policies are;

OBJ 1 To achieve the integrated sustainable management of the natural and physical resources of the Hawke's Bay region, while recognising the importance of resource use activity in Hawke's Bay, and its contribution to the development and prosperity of the region.

OBJ 2 To maximise certainty by providing clear environmental direction.

OBJ 3 To avoid the imposition of unnecessary costs of regulation on resource users and other people.

Variation 7 is considered consistent with Objective 1 as seasonal workers make a valuable contribution to the economic prosperity of the region, and providing for their accommodation is part of the sustainable management of both the housing and versatile land resources. The long term provision of accommodation needs for the land based primary production sector is

most closely aligned with RPS objectives around ‘*Managing the Built Environment*’ (Chapter 3.1B of the RPS).

This includes planned provision for urban development and integration of land use with significant infrastructure. The relevant objectives of the RPS are:

Objective UD1 Establish compact, and strongly connected urban form throughout the Region, that:

- Achieves quality built environments that ;
 - (i) Provide for a range of housing choices and affordability,
 - (ii) Have a sense of character and identity,
 - (iii) Retaining heritage values and values important to tangata whenua,
 - (iv) Are healthy, environmentally sustainable, functionally efficient and economically and socially resilient, and
 - (v) Demonstrates consideration of principles of urban design.
- Avoids, remedies or mitigates reverse sensitivity effects in accordance with objectives and policies in Chapter 3.5 of the Regional Resource Management Plan;
- Avoids remedies or mitigates reverse sensitivity effects on existing strategic and other physical infrastructure in accordance with objectives and policies in Chapter 3.5 and 3.13 of this plan;
- Avoids unnecessary encroachment of urban activities on the versatile land of the Heretaunga Plains and ;
- Avoids or mitigates increasing the frequency or severity of risk to people and property from natural hazards.

Objective UD2 Provide for residential growth in the Heretaunga Plains sub-region through higher density development in suitable locations.

Objective UD3 Identify and provide for the land requirements for the growth of business activities in the Heretaunga Plains in a manner that supports the settlement pattern promoted in Obj UD1

Objective UD4 Enable urban development in the Heretaunga Plains sub-region, in an integrated planned and staged manner which;

- *Allows for the adequate and timely supply of land and associated infrastructure; and*
- *Avoids inappropriate lifestyle development, ad hoc residential development and other inappropriate urban activities in rural parts of the Heretaunga Plains sub-region.*

Making provision for the accommodation of seasonal and RSE workers may be interpreted as support for land based primary production rather than directly being a housing issue. However, this issue is one which directly impacts on the housing issues of the district as seasonal worker accommodation is impacting on the availability of rental housing within the district.

Relevant Anticipated Environment Results in the RPS include:

AER UD1 ***Availability of sufficient land to accommodate population and household growth, as and where required, while retaining versatile land for existing and foreseeable future primary production.***

AER UD2	<i>Balanced supply of affordable residential housing and locational choice in the Heretaunga Plains subregion.</i>
AER UD3	<i>More compact, well-designed and strongly connected urban areas.</i>
AER UD6	<i>The retention, as far as is reasonably practicable, of the versatile land of the Heretaunga Plains for existing and foreseeable future primary production.</i>
AER UD7	<i>Efficient utilisation of existing infrastructure.</i>
AER UD9	<i>Increased use of public transport and active transport modes (cycling, walking), reduced dependency on the private motor vehicle and reduced energy use.</i>
AER UD12	<i>Urban development is avoided in areas identified as being at unacceptable risk from natural hazard (flooding, coastal inundation, coastal erosion, liquefaction, land instability).</i>
AER UD13	<i>New development is appropriately serviced by wastewater, stormwater, potable water and multi-modal transport infrastructure.</i>

The preparation of Variation 7 to the Proposed Hastings District Plan is subject to a statutory obligation to give effect to the above.

In summary, the RPS sets a vision for planned, compact and well-designed urban development within defined urban limits on the Heretaunga Plains with limited encroachment on the versatile soils of the Plains. Accommodation for seasonal workers sits somewhat outside objectives and policies related to urban development, as it is directly related to carrying out land based primary production.

Providing for seasonal worker accommodation within the Industrial Zones also results in the efficient utilization of existing infrastructure without the effects of complete on-site services.

‘Giving effect to’ the RPS is addressed in section 6 of this report.

4 Background – Current status of Seasonal Worker Accommodation in the Hastings District

4.1.1 Plains Production Zone

The Proposed District Plan currently provides specifically for seasonal workers accommodation only within the Plains Production Zone. This provision was provided through the last review of the District Plan. Provision for a building of up to 125m² was provided for as a permitted activity. One of the standards to be met as a permitted activity is for the building to be relocatable and it must also be located a minimum distance of 15 metres from the boundary. If those standards (or other general or specific performance standards) are not met, the activity becomes restricted discretionary. There is presently no scale limit beyond which the proposal requires discretionary or non-complying consent.

The review of the District Plan also provided a definition of Seasonal Workers accommodation which is;

“Seasonal Worker Accommodation: means any premises used for accommodation purposes directly associated with the seasonal labour requirements of the Districts horticulture, viticulture, and cropping industries and includes both new and existing permanent buildings and relocatable structures.”

The overriding objective of the Plains Production strategic management areas is that the land based productive potential and open nature of the Plains environment is retained.

4.1.2 General Industrial Zone

Within the General Industrial Zone seasonal worker accommodation is not specifically provided for and as such it is a non-complying activity.

Proposed Variation 7 will change provisions both within the Plains Production Zone and also within the General Industrial Zone and the Light Industrial zone to make provision for seasonal worker accommodation that is more ‘fit for purpose’ while also ensuring that the appropriate level of environmental mitigation is achieved.

4.1.3 Residential Zones

The scale of the activity is the important determinant for seasonal workers accommodation within residential zones. Up to a certain scale there is no differentiation in the level of effects between this type of activity and traditional residential activities such as a larger family, or flatting situation.

Currently seasonal workers accommodation is interpreted as a residential activity up to a certain threshold, and as an activity not provided for if the scale of the activity is considered not in keeping with residential amenity. However this approach is not legally set out in the Proposed District Plan and the variation will amend the definition of residential activity within the Plan to provide a fixed level of seasonal workers accommodation that is comparable to other residential activity in terms of scale. The identified level is 8 persons, on the basis that this is equivalent to a large household, or a 4 bedroom house. Beyond that level, the scale of accommodation is considered to go beyond what is reasonably anticipated as residential activity in residential zones, and full assessment would be required as a non-complying activity (as an activity not provided for in the zone).

4.2 Strategies and Plans relevant to Variation 7

The Rural and Urban Strategy section of the Proposed District Plan is relevant to Variation 7 as the aim of the provisions for seasonal worker accommodation in the Plains Production zone

is to protect the versatile land resource while enabling the sustainable operation of primary production activities.

Urban Strategy

- To reduce the impact of urban development on the resources of the Heretaunga Plains in accordance with the recommendations of the adopted Heretaunga Plains Urban Development Strategy.
- To retain and protect the versatile land resource that is the lifeblood of the local economy from ad hoc development.

Rural Strategy

- To promote the maintenance of the life-supporting capacity of the Hastings District's rural resources at sustainable levels.
- To enable the effective operation of primary production activities within established amenity levels in the rural areas of the Hastings District.

4.2.1 Heretaunga Plains Urban Development Strategy (HPUDS)

The guiding principles of the HPUDS document that are relevant are:

"Community and physical infrastructure that is planned, sustainable and affordable", and

"Productive value of its versatile land and water resources are recognised and provided for and used sustainably." and

"Quality living environments with high levels of amenity and thriving communities."

"A growing and resilient economy which promotes opportunities to Live, Work, Invest and Play."

This last guiding principle is of particular relevance to the provision for seasonal worker accommodation as it recognises the significance of the land based economy and encourages its further development. However it also recognises that while there should be opportunities to utilise the versatile soil resources, the loss of versatile land for productive purposes must be minimised.

While HPUDS does not specifically consider seasonal workers accommodation, it is a form of residential use that needs to be catered for in considering the growth needs of the district. This proposal is consistent with all of the above-mentioned Objectives and Guiding Principles. It is an efficient way of providing accommodation needs in the District that will mitigate the effect on the traditional housing stock which is already in short supply. It will also assist with ensuring that the productive value of the district's versatile land are managed in a sustainable manner.

4.2.2 Hastings Long Term Plan 2018-2028

The recently adopted Long Term Plan 2018-2028 sets out the following objective for Future Focus and Investment.

"Ensure a range of housing options are available to meet the need of a changing community whilst protecting our valuable soils"

Seasonal worker accommodation is a component of the housing needs of the district and has a direct impact on the availability of housing for the wider community. It is evident that without specific provision for seasonal worker accommodation the impacts on the existing rental market are significant. The variation will also assist in placing an appropriate limit on the amount of versatile land that might be utilized for seasonal workers accommodation.

5 Community Engagement Process & Results

Hastings primary producers have been reliant on seasonal workers to harvest their produce for a significant number of years. Originally these employees were overseas travellers or students. However as the volume of produce grew it became clear that the gaps could no longer be filled from this source and this resulted in sourcing labour needs from the Pacific Island communities. This was the emergence of the Recognised Seasonal Employer programme.

At the time that district plan was being reviewed submissions were received requesting that specific provision be made for seasonal worker accommodation within the Plains Production Zone. The scale of this accommodation was set at a level that would be realistic at the time as the vast majority of the workers were housed in accommodation within the city limits. However the number of workers required to meet the increased volumes of produce has increased significantly and this along with a strong economy has placed too much pressure on the existing housing resource.

This variation has arisen in response to industry concern about the shortage of accommodation and the likely future numbers of RSE workers required to meet the demand.

The Council set up a meeting with a number of Industry representatives to discuss the issues that they face with providing accommodation of the RSE workers and to ascertain what models of accommodation they would like to adopt.

A discussion document was drafted following a series of meetings in late 2017 and early 2018 and this covered the main points raised by the industry as set out below;

5.1.1 Specific engagement with key stakeholders, 2017

As outlined above meetings were held with representatives of the principal providers of RSE accommodation within the district. This included Turners and Growers, Mr Apple, Thornhill Horticultural Contracting Ltd, Bostock New Zealand, Crasborn Group/Freshmax, Hawke's Bay Fruitgrowers, and Apples and Pears Ltd.

The purpose of these meetings was to identify the main issues around seasonal worker and RSE accommodation and for the group to become a reference group on any documentation that was to be sent out to the general horticultural community for wider consultation.

5.1.2 What the industry representatives told us

- Need to provide for a doubling of numbers by 2022.
- Provide certainty on the consenting requirements.
- Larger accommodation models are required.
- On site models are preferred.

The pipfruit industry is undergoing a considerable growth in demand and over a million new trees were planted in the 2018 planting season. This will translate to an estimated doubling in the number of RSE Workers by 2022, taking the total to approximately 8000. The industry states that the existing accommodation models will not be able to meet any increase in demand.

Stakeholders suggested that there were two models that were most attractive to them. The first was a large 'camp style' model that would comprise large dormitory buildings housing up to 300 workers accompanied by large community facilities such as kitchens, and dining areas

all of which surround outdoor recreation areas. The scale of these activities is such that they would negatively impact on the versatile soils which they are designed to service.

The second model, on site accommodation, is a preferred model by the recognised seasonal employers. This type of model has the benefit of not having to transport workers around, and it allows for easier pastoral care which is a requirement for the employers. However there is a balance that needs to be achieved between the scale of the activity and the degree of impact that it has on the versatile land.

The other issue is that the stakeholders want certainty as to the nature of the resource consent that will be required. Central to this is certainty on the type of information that will be required to accompany the resource consent application.

6 Matters for Consideration

6.1 Regional Policy Statement (RPS) Considerations

The RPS has objectives and policies for the territorial authorities to consider during preparation of any variation or plan change for development of land within the Region. This variation is not of a regionally significant scale and therefore does not warrant a detailed assessment against the list of matters identified in Section 3.1. However, the Regional Plan provides some broad objectives and policies that are useful in providing guidance for urban development initiatives such as this.

The Policies in providing for development are:

PROVISION FOR URBAN ACTIVITIES

POL UD1 *In providing for urban activities in the Heretaunga Plains sub-region, territorial authorities must place priority on ;*

- *The retention of the versatile land of the Heretaunga Plains for existing and foreseeable future primary production, and*
- *Ensuring efficient utilisation of existing infrastructure, or*
- *Ensuring efficient utilisation of planned infrastructure already committed to by a local authority, but not yet constructed.*

MATTERS FOR DECISION-MAKING (REGION)

POL UD2 *In preparing or assessing any rezoning, structure plans, or other provisions for the urban development of land within the Region, territorial authorities shall have regard to:*

- a) *The principles of the New Zealand Urban Design Protocol (Ministry for the Environment, 2005); ...*
 - b) *New Zealand Standard NZS4404:2010 Land Development and Subdivision Infrastructure, and subsequent revisions;*
 - c) *Good, safe connectivity within the area, and to surrounding areas, by a variety of transport modes, including motor vehicles, cycling, pedestrian and public transport, and provision for easy and safe transfer between modes of transport;*
 - d) *Location within walkable distance to community, social and commercial facilities;*
 - e) *Provision for a range of residential densities and lot sizes, with higher residential densities located within walking distance of commercial centres;*
-

- f) Provision for the maintenance and enhancement of water in waterbodies, including appropriate stormwater management facilities to avoid downstream flooding and to maintain or enhance water quality;*
- g) Provision for sufficient and integrated open spaces and parks to enable people to meet their recreation needs, with higher levels of public open space for areas of higher residential density;*
- h) Protection and enhancement of significant natural, ecological, landscape, cultural and historic heritage features;*
- i) Provision for a high standard of visual interest and amenity;*
- j) Provision for people's health and well-being through good building design, including energy efficiency and the provision of natural light;*
- k) Provision for low impact stormwater treatment and disposal;*
- l) Avoidance, remediation or mitigation of reverse sensitivity effects arising from the location of conflicting land use activities;*
- m) Avoidance of reverse sensitivity effects on existing strategic and other physical infrastructure, to the extent reasonably possible;*
- n) Effective and efficient use of existing and new infrastructure networks, including opportunities to leverage improvements to existing infrastructure off the back of proposed development;*
- o) Location and operational constraints of existing and planned strategic infrastructure;*
- p) Appropriate relationships in terms of scale and style with the surrounding neighbourhood; and*
- q) Provision of social infrastructure.*

In 'giving effect to' the RPS, consideration needs to be given to the unique nature of the seasonal workers accommodation. In this respect a number of the matters raised in Policy UD12 are less relevant to this proposal than others, given the fact that this accommodation is of a temporary nature, does not have ownership rights attached and the residents will be homogenous in nature.

However there are a number of these principles that still have particular relevance to the provision of seasonal worker accommodation. This includes:

- c) Good safe connectivity to surrounding areas by a variety of transport modes.
- f) Provision for the maintenance and enhancement of water in waterbodies, including appropriate stormwater management facilities to avoid downstream flooding and to maintain or enhance water quality.
- g) Provision for sufficient and integrated open spaces and parks to enable people to meet their recreation needs, with higher levels of public open space for areas of higher residential density.
- h) Protection and enhancement of significant natural, ecological, landscape, cultural and historic heritage features.
- i) Provision for a high standard of visual interest and amenity.
- j) Provision for people's health and well-being through good building design, including energy efficiency and the provision of natural light.

- l) avoidance, remediation or mitigation of reverse sensitivity effects arising from the location of conflicting land use activities.

The provision for RSE accommodation models sought by the employers is of a scale that could potentially impact on Policy UD1 in that they could have a negative impact on future primary production in the Plains Production zone. The challenge is to find the most appropriate scale for on-site development i.e. finding a model that is efficient in providing for a number of employees on-site while also safeguarding the versatile land for productive purposes. The variation provides for accommodation for up to 80 workers on-site along with the necessary ablution and communal blocks. The MBIE standard is for 4.5m² of bedroom space per worker plus additional floor area for the ablution and kitchen/dining facilities. At this level of development it will provide for seasonal accommodation around 4 times the current size provided for as permitted in the Plains Production zone (i.e. approximately 400m² compared to 125m² currently provided for as a permitted activity). This is exclusive of the service and shared space areas.

The matters that are included under Policy UD12 are as relevant to a large scale accommodation model as proposed by the RSE Stakeholders as they are for a rezoning for a greenfield development. The accommodation needs to ensure that it has connectivity to the various transport modes, that its stormwater does not negatively impact on waterways and downstream properties and it should provide a high standard of visual interest and amenity and ensure that it does not result in reverse sensitivity effects.

6.2 Connectivity, Social Infrastructure and Open Space

Relevant RPS provisions:

POL UD12 *In preparing or assessing any rezoning, structure plans, or other provisions for the urban development of land within the Region, territorial authorities shall have regard to:*

- c) Good, safe connectivity within the area, and to surrounding areas, by a variety of transport modes, including motor vehicles, cycling, pedestrian and public transport, and provision for easy and safe transfer between modes of transport;*
- d) Location within walkable distance to community, social and commercial facilities;*
- g) Provision for sufficient and integrated open spaces and parks to enable people to meet their recreation needs, with higher levels of public open space for areas of higher residential density;*
- p) Provision of social infrastructure;*

POL UD10.4 *Notwithstanding Policy UD10.1, in developing structure plans for any area in the Region, supporting documentation should address:*

- c) How effective provision is made for a range of transport options and integration between transport modes;*

AER UD3 *More compact, well-designed and strongly connected urban areas.*

AER UD9 *Increased use of public transport and active transport modes (cycling, walking), reduced dependency on the private motor vehicle and reduced energy use.*

AER UD13 *New development is appropriately serviced by wastewater, stormwater, potable water and multi-modal transport infrastructure.*

Again while seasonal workers accommodation is not strictly urban development this policy does provide some useful guidance for its establishment. Transport considerations are an

important component for accommodation locations. The Recognised Seasonal Employers provide transport for their employees so access to alternative transport modes does not have the same level of importance for seasonal workers accommodation. Transport efficiencies will be obtained through providing for large scale activities rather than having a large number of smaller accommodation units spread across the district. The centralized locations within the Omahu and Irongate industrial zones will also ensure that transportation efficiencies are gained. The Recognised Seasonal Employers have a duty to provide for the pastoral needs of their employees and this includes meeting their transport needs. Similarly the open space/recreational needs of the employees form part of the pastoral care responsibilities and the new developments will provide for their own open space/recreational needs.

Therefore, Proposed Variation 7 ensures that proper regard has been had to connectivity to surrounding areas, and that it will provide for an appropriate level of social infrastructure.

Services Infrastructure

Relevant RPS provisions:

POL UD12 In preparing or assessing any rezoning, structure plans, or other provisions for the urban development of land within the Region, territorial authorities shall have regard to:

- a) New Zealand Standard NZS4404:2010 Land Development and Subdivision Infrastructure, and subsequent revisions;***
- f) Provision for the maintenance and enhancement of water in waterbodies, including appropriate stormwater management facilities to avoid downstream flooding and to maintain or enhance water quality;***
- k) Provision for low impact stormwater treatment and disposal;***
- n) Effective and efficient use of existing and new infrastructure networks, including opportunities to leverage improvements to existing infrastructure off the back of proposed development;***
- o) Location and operational constraints of existing and planned strategic infrastructure;***

POL UD10.4 Notwithstanding Policy UD10.1, in developing structure plans for any area in the Region, supporting documentation should address:

- a) The infrastructure required, and when it will be required to service the development area;***
 - b) How development may present opportunities for improvements to existing infrastructure provision;***
 - d) How provision is made for the continued use, maintenance and development of strategic infrastructure;***
 - e) How effective management of stormwater and wastewater discharges is to be achieved;***
-

The two options for seasonal workers (RSE) accommodation will have different servicing requirements. The larger camp models are to be provided for in the general industrial zones of Omahu and Irongate, where the servicing of them can be provided through council infrastructure, with the exception of stormwater disposal which is to be provided for in Omahu and Irongate by the individual property owners. There is also a recognised limitation associated with the capacity of the wastewater system as it applies to Irongate. A wastewater threshold has been put in place to recognise this limitation. This applies to any activity locating

at Irongate. Depending on the size of the site this will place some restriction on the size of the seasonal workers accommodation that can be accommodated on the site. However generally seasonal workers are able to be accommodated by Council infrastructure. Where facilities are provided for within the Plains Production zone the servicing of these sites is to be provided for on-site.

The above confirms that the proposed type of activity can effectively and efficiently connect to existing public infrastructure where it is available and can be appropriately self-serviced in other regards.

6.3 Noise Effects

Relevant RPS provisions:

POL UD12	<i>In preparing or assessing any rezoning, structure plans, or other provisions for the urban development of land within the Region, territorial authorities shall have regard to:</i>
	<i>1) Avoidance, remediation or mitigation of reverse sensitivity effects arising from the location of conflicting land use activities;</i>

Reverse sensitivity applies to situations where a potentially incompatible land use is proposed to be sited next to an existing land use. The expansion of residential type activity into industrial zones has previously been avoided as this may result in conflict at the residential/industrial interface (e.g. amenity standards expected by new residential dwellers could place constraints on existing permitted commercial activities. Typically, concerns revolve around noise.

6.3.1 Noise

The Proposed Plan addresses noise sensitive activities in commercial zones with Specific Performance Standard 25.1.7C. This provision requires that Minimum External Sound Insulation Level Standards apply to all habitable spaces within industrial zones. This ensures that noise sensitive activities, such as residential living are insulated to mitigate the effects of high background noise levels. These provisions are relatively recent (reviewed as part of the District Plan review) and are based on best practice.

Therefore, the provisions of the Proposed Hastings District Plan provides sufficient ability to avoid or mitigate reverse sensitivity effects arising from permitting residential activity, a noise sensitive activity in the industrial zone.

6.4 Benefits and Costs

Section 32 requires consideration of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated as a result of adoption of the plan variation, including opportunities for economic growth and employment that are anticipated to be provided or reduced (s32(2)(a)). These are considered for each option in the tables to follow.

Making provision for residential accommodation for seasonal workers is considered a critical part of ensuring the sustainable management of the soils resource to the regional economy. The region is heavily reliant on seasonal and RSE workers for the successful management of the pipfruit and viticulture industries. Variation 7 makes provision for seasonal worker accommodation within zones where it would otherwise have a more stringent activity status under the RMA. The economic costs of this lie in the loss of opportunity to use the land for the purpose for which it was zoned, which are the Plains Production and the General Industrial

zones. However it can equally be argued that without the seasonal workers these zones could not achieve their full productive potential. The produce from the Plains land is reliant on the seasonal workers and equally many of the industrial activities within the region are directly linked to the produce from the Plains Production zone. The only other obvious economic cost to the provision of seasonal workers accommodation is the cost of the infrastructure required to service the development. Within the Industrial zones this is provided by the Council and paid for through the development contributions when the land is developed. Within the Plains Production zone the servicing of the accommodation facilities would be met by the landowner/developer.

The provision of seasonal workers accommodation presents significant economic benefits to primary producers to enable them to maintain and harvest their crops in the most efficient and cost effective manner. There will also be direct economic benefits to landowners, developers and the building sector, through improved capital values for landowners and through economic growth and employment resulting from subsequent development and construction opportunities. There is also a real benefit to the rental housing market as currently many RSE workers are accommodated within housing that would otherwise have been available to the market.

Providing for seasonal workers accommodation will also have flow on economic benefits to the wider Hastings and Hawke's Bay community, through the creation of a more resilient primary production economy.

There will be environmental benefits arising from the variation as a result of limits being placed on the number of seasonal workers able to be accommodated on Plains Zoned land. This will ensure that the amount of versatile land removed from production will be limited. It will also ensure that the larger camp models are provided for in areas where they can connect to Council infrastructure and do not have to rely on on-site servicing, which could be problematic if the numbers catered for in the Plains Production zone were to be too large.

6.5 Conclusion as to Suitability

The above assessment confirms that there are no other significant factors that suggest the proposed areas subject to the variation are unsuitable for seasonal workers accommodation development.

7 Appropriateness, Efficiency & Effectiveness of Proposed Variation 7 in Achieving the Purpose of the RMA

7.1 Is the Proposal the Most Appropriate Way to Achieve the Purpose of the RMA?

As outlined in section 2 of this report, the first part of this evaluation is whether the purpose of the proposal is the most appropriate way to achieve the purpose of the RMA. The purpose of the proposal is:

Purpose of the Proposal:

To provide for the accommodation resource needs for seasonal workers to assist with, and at the same time protect, the sustainable management of the natural and physical resources of the Heretaunga Plains and reduce the pressure on the existing residential rental stock.

The assessments above in section 3 to 6 of this report, demonstrate the following:

1. The proposal will assist in ensuring that accommodation needs of seasonal and RSE workers can be met to assist with maintaining the economic well-being of the district.
2. The provision of greater certainty for seasonal workers accommodation will assist with meeting the heightened demand for housing in the Hastings District thereby taking pressure off the existing residential rental housing resource.
3. The proposal amends the Proposed Plan in a way that will achieve integrated management of the effects and use of the land for residential purposes, by ensuring that the labour resource required to sustainably manage the Plains Production zone is provided for. In this way the proposal seeks to enable people and communities to provide for their social and economic wellbeing.
4. The requirement to 'protect' the sustainable management of the Heretaunga Plains appropriately balances the provision of seasonal workers accommodation with the protection of the versatile soils on productive sites.
5. The concept of seasonal accommodation is well accepted by the community and is seen as vital to the social, cultural and economic wellbeing of the district.
6. The results of the stakeholder engagement process during preparation of proposed Variation 7 suggests general overall acceptance and a level of support for the proposal.

Ultimately, the proposal gives effect to the RPS, and is efficient and effective in providing for the sustainable management of the natural and physical resources of the Heretaunga Plains in a way which enables people and communities to provide for their social, economic and cultural wellbeing; meets the reasonably foreseeable needs of future generations; safeguards the life-supporting capacity of air, water, soil and ecosystems; and avoids, remedies or mitigates adverse effects on the environment.

The proposal is confirmed as representing the most appropriate way to achieve the purpose of the RMA, specifically by providing for the sustainable management of the District's resources with particular reference to the physical land resource of the Heretaunga Plains.

7.2 Are the Provisions the Most Appropriate Way to Achieve the Purpose of the Proposal?

The following evaluation examines whether the provisions in the proposal are the most appropriate way in which to achieve the purpose of the proposal as well as the existing relevant objectives of the District Plan.

Case law on s 32 has interpreted ‘most appropriate’ to mean “suitable, but not necessarily superior”². Therefore, the most appropriate option does not need to be the most optimal or best option, but must demonstrate that it will meet the objectives in an efficient and effective way.

As a variation to a proposed plan, this is regarded as an ‘amending proposal’ under Section 32 of the RMA. In terms of section 32(1)(a) no objectives are proposed and the existing objectives of Section 6.2 Plains Production Zone, Section 7.5 Light Industrial Zone and Section 14.1 Industrial Zone of the Proposed Plan are relevant.

The focus of this evaluation is on the differences between what was adopted under the Proposed Plan and what is now being proposed under Variation 7.

It is important to note that the provisions of Section 6.2 Plains Production Zone, Section 7.5 Light Industrial Zone and Section 14.1 Industrial Zone that are not being altered by the Variation do not need to be reconsidered.

This evaluation will assess the following aspects of the Variation:

- The scale of seasonal worker accommodation permitted in the Plains Production, Light Industrial and General Industrial zones.
- The activity status for seasonal workers accommodation in the Plains Production, Light Industrial, General Industrial zones.
- The most appropriate location for the model of development that is being sought by stakeholders.
- The most appropriate method for dealing with seasonal worker accommodation in Residential zones.

And is at a level of detail that corresponds to the scale and significance of the effects anticipated from implementation of the proposal.

Much of the background and assessment in the preceding sections of this report contributes to the overall evaluation of the specifics of this proposal.

7.2.1 Place limits on the scale of Seasonal Worker Accommodation facilities within the Plains Production Zone.

7.2.1.1 Options

Options are:

1. **Do Nothing** – this option would involve retaining the permitted activity status for seasonal workers accommodation up to 125m² in floor area within the Plain Production Zone and restricted discretionary status for anything larger than that limit;

² Rational Transport Soc Inc v New Zealand Transport Agency HC Wellington CIV-2011-485-2259, 15 December 2011.

2. **Provide for seasonal workers accommodation in the Plains Production Zone with a maximum of 80 persons.**– this option involves amending the Rules applying to seasonal worker accommodation Plains Production Zone; or
3. **Place no limit on the scale of seasonal workers accommodation within the Plains Production zone** – this option involves amending the Rules applying to seasonal worker accommodation Plains Production Zone to make them much more permissive.

7.2.2 Activity status for seasonal workers accommodation in the Plains Production and Industrial Zones

7.2.2.1 Options

Options are:

1. **Do Nothing** – this option would involve retaining permitted activity status up to the floor limits within the Plains Production zone, and restricted discretionary over that; and non-complying activity within the Industrial zones;
2. **Provide for Controlled activity status within the zones.**– this option involves amending the provisions applying to seasonal worker accommodation in the Plains Production and Industrial zones to require controlled activity consent; or
3. **Provide for Restricted Discretionary activity status within the zones-** this option involves amending the provisions applying to seasonal worker accommodation in the Plains Production and Industrial zones.

7.2.3 Consider the most appropriate location of accommodation models

7.2.3.1 Options

Options are:

1. **Do Nothing** – this option would involve no changes to the existing provisions and not making provision for seasonal worker accommodation within the Industrial Zones; or
2. **Providing for seasonal Workers accommodation only on the site to which they are required (Plains Production zone sites)-** this option involves amending the provisions for the Plains Production zone ; or
3. **Providing for seasonal workers accommodation in a mix of zones according to scale. -** this option involves amending the provisions of the Plains Production, Light Industrial and General Industrial zones.

7.2.4 Providing certainty for Seasonal Workers Accommodation in Residential Zones.

7.2.4.1 Options

Options are :

1. **Do Nothing** – this option would involve no changes to the existing provisions which do not making specific provision for seasonal worker accommodation within the Residential Zones but where it is treated as a residential activity with only guideline limits on the numbers; or
2. **Amend the definition of Residential activity to include seasonal worker accommodation with limits set for the number of seasonal workers where it occurs in a Residential Zone.** This option involves making provision for seasonal workers as part of normal residential activity where the scale is analogous to ordinary residential activity anticipated in a residential zone.

3. **Provide for seasonal worker accommodation as a restricted discretionary activity** – This option involves amending the provisions of the residential zones to provide for seasonal worker accommodation as a restricted discretionary activity. Note that separate consideration was not given to making seasonal worker accommodation a permitted activity in residential zones as the same result is considered to be achieved through Option 2.

7.2.5 Servicing Limits for Wastewater at Irongate

7.2.5.1 Options

Options are:

1. **Do Nothing** – this option would involve no changes to the existing provisions which do not require any specific consideration to be given to the effects of wastewater on the Irongate infrastructure network. This would result in the seasonal workers being a non-complying activity; or
2. **Limit the range of activities that are provided for in the General Industrial zone at Irongate to ensure that the activities are compatible with the limits of the wastewater network. This will result in seasonal workers accommodation being non-complying.** This option involves amending the provisions of the general industrial zone to identify only those activities with minor levels of wastewater discharge.
3. **Establish a threshold for the volume of wastewater discharge from a site at Irongate and provide for seasonal worker accommodation as a restricted discretionary activity in the zone with a requirement to meet the performance standard and non-complying if the threshold standard is exceeded.** – This option involves amending the provision of the General Industrial zone as it directly applies to Irongate to introduce a rule for the maximum volume of wastewater that can be produced from a site. It provides for seasonal worker accommodation as a restricted discretionary activity where it meets the threshold, and non-complying beyond that.

7.2.5.2 Evaluation of Options

Table 1: Issue: Residential Extent: Option Evaluation:

	OPTION 1: NO CHANGE	OPTION 2: 80 WORKER LIMIT	OPTION 3: NO LIMIT ON SCALE
	Retain the Seasonal Accommodation Rule PP9 So That seasonal workers accommodation remains a permitted activity up to a maximum floor area of 125m ² and restricted discretionary above that.	Provide for seasonal workers accommodation in the Plains Production zone with a maximum of 80 persons as a restricted discretionary activity and as a non-complying activity above 80 persons.	Place no limit on the scale of seasonal workers accommodation in the Plains Production Zone.
EFFECTIVENESS			
In achieving: - the purpose of the Proposal; and - existing relevant objectives of the District Plan.	<p>Objective PPO1 seeks to ensure that the versatile land across the Plains Production Zone is not fragmented or compromised by building and development. However Policy PPP5 recognises that residential buildings are a legitimate part of land based primary production <i>“Recognise that residential dwellings and buildings accessory to them are part of primary production land use but that the adverse effects of these buildings on the versatile land of the Plains production Zone are managed by specifying the number and size of the buildings that are permitted.”</i></p> <p>While the legitimacy of residential activity within the zone is not questioned the plan is clear that the scale of development should be part of the consideration of the effects on versatile land. This is clearly espoused in Policy PPP3 <i>“Limit the number and scale of buildings (other than those covered by Policy PPP4) impacting on the versatile soils of the District.”</i></p> <p>The current Rule, PP9, limits the size of seasonal worker accommodation to 125m² for the activity to be permitted. This is considered insufficient to meet the needs of the landowners. Over that limit, any proposal is restricted discretionary, with no limit as to size.</p> <p>With no limit as to size the current rule is not effective in meeting Objective PPO1 or Policy PPP3, nor does it meet the purpose of the proposal which aims to provide seasonal workers accommodation while ensuring the sustainable management of the Heretaunga Plains.</p> <p>One of the other objectives for the zone PPO2 is to provide for flexibility in options for the use of versatile land where the activity is linked to the use of the land but with limits on scale to protect soil values and rural character. This objective is to ensure that the maximum productive potential of the land can be achieved by the landowner while safeguarding the resource for future generations.</p>	<p>While the current provisions in the Plains Production Zone are not effective in achieving the purpose of the Proposal, it is important to acknowledge existing objectives and policies for the zone to control the scale of development. The justification for this is well espoused in the introduction to the Plains Production zone which states:</p> <p><i>The Plains Production zone recognises the growing powerhouse of the district. It is the focus for cropping, viticulture and orcharding in the region and in these activities it is nationally significant. The key to its productivity is the versatile land resource which provides flexibility into the future for changing productive land uses. Retaining this land for production purposes is a principle that forms one of the Council’s cornerstones for sustainability of the District’s natural and physical resources.</i></p> <p>There is a balance that must be met in making sure that the facilities needed to successfully manage primary production activities are provided for, with the need for limits to ensure that not too much of the versatile land which drives the need is not lost from production.</p> <p>Therefore to enable landowners to make provision for seasonal workers accommodation on-site at a level that is effective and efficient, one option is to set limits on the seasonal provided for on site.</p> <p>Option 2 proposes that the maximum number of workers to be provided for on-site be set at 80. This is on the basis that while there is a need to provide for seasonal workers on-site, there is the need to take into account the effect that larger scale facilities might have on the versatile land resource. Beyond the 80 resident threshold the footprint of the accommodation and the level of on- site services that will be required, such as on site stormwater detention, will begin to have adverse effects on the amount of versatile land that is required to service the accommodation. As a result the activity status beyond the 80 person threshold is</p>	<p>Under the discussion for Option 2 it was stated that a central part of the objectives of the Plains Production zone relate to protecting the versatile land for land based primary production.</p> <p>Option 3 would meet the purpose of the proposal in part by making it easy to provide for seasonal worker accommodation however this option does not give any consideration to the effects of the proposal on the natural and physical resources of the district particularly the versatile land resource.</p> <p>The versatile land resource is a limited resource and as such the district plan has placed performance standards on activities within the Plains Production zone to mitigate the effects of activities on the resource. One of these standards is around the scale of development provided for as a permitted activity. To allow for seasonal worker accommodation to be constructed without any floor area standard would not be effective in meeting the objectives of the Plains Production zone. It would also not result in a consistent approach to the consideration of the effects of activities on the versatile soil resource.</p> <p>Option 3 is considered an ineffective way to provide for Seasonal Worker (RSE) accommodation within the Plains Production zone and would fail to meet the objectives of the Proposed District Plan.</p>

	OPTION 1: NO CHANGE Retain the Seasonal Accommodation Rule PP9 So That seasonal workers accommodation remains a permitted activity up to a maximum floor area of 125m² and restricted discretionary above that.	OPTION 2: 80 WORKER LIMIT Provide for seasonal workers accommodation in the Plains Production zone with a maximum of 80 persons as a restricted discretionary activity and as a non-complying activity above 80 persons.	OPTION 3: NO LIMIT ON SCALE Place no limit on the scale of seasonal workers accommodation in the Plains Production Zone.
	<p>While Option 1 does provide landowners with flexibility in the use of their land it does not place limits on the scale able to be applied for by means of a restricted discretionary activity.</p> <p>Option 1: Status Quo is considered to be partially effective in achieving the relevant objectives of the Proposed Plan for this zone; and the purpose of the Proposal by providing for seasonal workers accommodation associated with versatile land but the scale that it allows would not provide for the sustainable management of the versatile land. -</p>	<p>non-complying. This variation provides for accommodation facilities beyond this scale in the Light Industrial and General Industrial zones, where servicing is available, thereby allowing for the versatile land to be used in a sustainable manner.</p> <p>Option 2 is considered to be a very effective way to achieve the purpose of the proposal and enable seasonal worker (RSE) accommodation within the Plains Production zone. It is highly effective in meeting the objectives of the zone where an appropriate balance of providing for accessory buildings for primary production purposes while not taking too much land out of production is achieved.</p>	
COSTS Effects anticipated from implementation, including: <ul style="list-style-type: none"> - Environmental - Economic (incl. on economic growth & employment) - Social - Cultural 	<p>The current floor limits on the seasonal accommodation do not meet the needs of growers especially with the growth in production levels. Exceeding the 125m² floor area maximum would require resource consent which has both financial and timing costs.</p> <p>Retention of the status quo could also lead to additional costs associated with transport as most staff would be off-site and this would lead to an increase in transport costs to get the workers to their place of work.</p> <p>The other cost that is likely to be experienced is the costs to the community as a result of the district's rental housing being taken up with seasonal workers, thereby pushing rental prices up and /or leading to a lack of supply in the market.</p> <p>The Recognised Seasonal Employers have reported that there are social and cultural costs of having workers split across numerous accommodation facilities.</p>	<p>The costs associated with Option 2 are the environmental effects of providing for development of this scale on the versatile land resource. There is also the environmental effects of the on-site servicing of the accommodation facilities.</p> <p>There are financial costs associated with the construction of the accommodation facilities. There could also be some cost associated with the removal of the land required for the accommodation facility from production.</p> <p>If consent was applied for to exceed the 80 person threshold there would be the increased cost associated with a non-complying resource consent application.</p>	<p>This option could have a significant environmental cost in terms of the effects on the versatile land if the scale of the development was unfettered. Very large scale facilities will require more services on-site to meet the pastoral needs of the workers such as outdoor recreation areas and places to assemble.</p> <p>There would also likely be environmental costs associated with large scale accommodation buildings on the amenity and character of the rural area, which could not be assessed or controlled through the consenting process under this option.</p> <p>The economic costs arising from this option will be around the loss of versatile land from production or potential production.</p>
BENEFITS Effects anticipated from implementation, including: <ul style="list-style-type: none"> - Environmental - Economic (incl. on economic growth & employment) - Social - Cultural 	<p>There would be little environmental effect from the on-site servicing of the smaller scale building allowed for as a permitted activity, with reduced stormwater run-off and a smaller wastewater system required.</p> <p>Option 1 has economic benefits to landowners by having all of their operations on site.</p> <p>As for all options there will be benefits to the community of reducing the competition for existing rental accommodation.</p>	<p>Providing for seasonal accommodation on-site under Option 2 has some environmental benefits in terms of reducing the transportation of workers from their accommodation to the property/properties that they are working on.</p> <p>Using a small area of the versatile land for the purpose of providing housing for workers that are required to manage the primary production activity is a sustainable way to cater for the accommodation of seasonal workers.</p> <p>This option also assists with the availability of existing rental accommodation within the district. Currently there are social effects as a result of rental housing shortages.</p>	<p>The ability to construct seasonal accommodation of sufficient size to meet the needs of the landowner will have economic benefits to the landowner through achieving economies of scale.</p> <p>As for Option2 there will be benefits for the community in releasing existing rental housing to the general market. Likewise there will be benefits in the reduced transport costs, although this may be offset to some degree by the need to transport workers around to meet their pastoral needs e.g. into town.</p>

	OPTION 1: NO CHANGE Retain the Seasonal Accommodation Rule PP9 So That seasonal workers accommodation remains a permitted activity up to a maximum floor area of 125m ² and restricted discretionary above that.	OPTION 2: 80 WORKER LIMIT Provide for seasonal workers accommodation in the Plains Production zone with a maximum of 80 persons as a restricted discretionary activity and as a non-complying activity above 80 persons.	OPTION 3: NO LIMIT ON SCALE Place no limit on the scale of seasonal workers accommodation in the Plains Production Zone.
		Anecdotaly it has been stated that the housing of seasonal workers has significantly reduced the amount of rental accommodation within the Hastings District. The ability to increase the number of workers catered for on-site within the Plains Production zone will benefit this social effect. There is little to no additional Council infrastructure costs to service the area as all servicing will be undertaken on site.	
EFFICIENCY In achieving: - the purpose of the Proposal; and - existing relevant objectives of the District Plan.	This option is efficient in meeting the objectives of retaining the productive potential of versatile land for future generations. However there is little benefit to the landowner with this option as they are unable to efficiently manage the maintenance and harvesting of their produce without being able to meet the needs of their workers.	<u>Highly Efficient</u> This option is highly efficient in meeting the purpose of the proposal and also the relevant objectives of the district plan which provide for accessory buildings that are required for the management of the land based primary production.	<u>Low level of Efficiency</u> This option has a low level of efficiency as it does not meet the objectives relating to the maintenance of the productive potential of versatile land.
OVERALL APPROPRIATENESS In achieving: - the purpose of the Proposal; and - existing relevant objectives of the District Plan.	Not Appropriate	Appropriate	Not appropriate
RISK OF ACTING OR NOT ACTING (if uncertain or insufficient information)	N/A (information is sufficient and certain).	N/A (information is sufficient and certain).	N/A (information is sufficient and certain).
CONCLUSION: The above evaluation demonstrates that providing for seasonal workers accommodation up to a maximum of 80 workers in the Plains Production Zone (option 2), is the most efficient and effective way to ensure that the accommodation needs of the seasonal workers are met while safeguarding the versatile soils of the Heretaunga Plains for future generations.			

7.2.5.3 Evaluation of Options

Table 2: Issue: Activity status for Seasonal Workers Accommodation

	OPTION 1: Retain permitted activity status up to the 80 person limit option in the Plains Production zone (and restricted discretionary beyond this) and for an unlimited floor area in the Industrial zones.	OPTION 2: Controlled activity up to the 80 person limit option in the Plains Production zone (and restricted discretionary beyond this) and for an unlimited floor area in the Industrial zones.	OPTION 3: Provide for restricted activity status up to the 80 person limit option in the Plains Production zone (and non-complying beyond this) and for an unlimited floor area in the Industrial zones.
EFFECTIVENESS In achieving: <ul style="list-style-type: none"> - the purpose of the Proposal; and - relevant objectives of the District Plan. 	<p>While this option is effective in providing for the purpose of the proposal it cannot be said to be effective in achieving the objectives of the District Plan. The objectives of the Plains Production zone seek to put limits on the scale of buildings within the Plains Production zone. This is principally based around a 100m² floor area limit.</p> <p>Once above this 100m² floor area threshold resource consent is required. This is for a restricted discretionary activity where the effects on the versatile land becomes an important part of the assessment of effects required for resource consent applications. Providing for 80 people as a permitted activity would mean effects on versatile land could not be assessed and this would not achieve existing objectives of the Plains Production Zone, nor the requirement of the proposal that the soils resource be protected. There is also a concern that the limit could be used as a 'permitted baseline' argument to support applications for buildings unrelated to the primary productive purpose of the zone.</p> <p>In regards to the Industrial zones the fact that it is intended that there be no limit to the floor area necessitates the need to be able to possibly decline the application if the effects are such that they could not be appropriately mitigated by means of conditions. While it is considered that the permitted activity status within the Industrial zone would be effective in meeting the purpose of the proposal it would not be effective in meeting Objective IZO3 <i>Industrial activities shall maintain acceptable amenity levels or be safeguarded from incompatible uses within surrounding environments</i>, in the General Industrial Zone of the Proposed District Plan.</p>	<p>As a controlled activity approval must be granted for any application made, with the ability to attach conditions to the consent.</p> <p>This is not considered to be an effective option within the Plains Production zone as it may not be possible to always mitigate the effects of the activity. As a result It cannot be guaranteed that the proposal would be effective in meeting the objectives of the Plains Production zone.</p> <p>Objective PPO1 <i>To ensure that the versatile land across the Plains Production zone is not fragmented or compromised by building and development.</i></p> <p>If an application for consent up to 80 people is made and conditions are unable to appropriately mitigate the effects, Objective PPO1 is unlikely to be met. This option could not therefore be considered effective in meeting the objectives of the Proposed District Plan.</p> <p>As for Option 1 in regards to the Industrial zones, the fact that it is intended that there be no limit to the floor area necessitates the need to be able to possibly decline the application if the effects are such that they could not be appropriately mitigated by means of conditions. While it is considered that this activity status within the Industrial zone would be effective in meeting the purpose of the proposal it would not be effective in meeting Objective IZO3 <i>Industrial activities shall maintain acceptable amenity levels or be safeguarded from incompatible uses within surrounding environments</i>, in the General Industrial Zone of the Proposed District Plan.</p>	<p>The purpose of the proposal is to provide for the accommodation resource needs for seasonal workers to assist with, and at the same time protect the sustainable management of the natural and physical resources of the Heretaunga Plains and reduce the pressure on the existing residential rental stock.</p> <p>This option is effective in meeting the above purpose of the proposal and Objective PPO1 in that it finds a balance in the Plains Production zone between providing for seasonal worker accommodation on-site and settling on a scale that should not have a significant impact on the versatile land of the Heretaunga Plains, subject to assessment and the imposition of conditions to avoid this. This is also consistent with the scale provided for other activities that add value to land based primary production activities.</p> <p>In regards to the Light and General Industrial zones this option will assist with ensuring that industrial activities shall be safeguarded from incompatible uses with surrounding environments. This activity status will be more effective in controlling the risk of reverse sensitivity and meeting Objective IZO3.</p> <p>This restricted discretionary activity status will also be most effective in meeting Objective IZO2 <i>To enable a diverse range of industrial activities within the Hastings District while ensuring adverse effects on the environment, human health and safety are avoided, remedied or mitigated.</i> A restricted discretionary status will allow for seasonal workers accommodation as part of the wider horticultural industry while allowing discretion for the consideration of the adverse effects.</p>
COSTS Effects anticipated from implementation, including:	Does not enable consideration to be given to the location of the building development to avoid the most valuable soils.	The inability to decline the application could result in some of the most versatile land being adversely affected.	The effect of the development on the versatile soil resource.

	OPTION 1: Retain permitted activity status up to the 80 person limit option in the Plains Production zone (and restricted discretionary beyond this) and for an unlimited floor area in the Industrial zones.	OPTION 2: Controlled activity up to the 80 person limit option in the Plains Production zone (and restricted discretionary beyond this) and for an unlimited floor area in the Industrial zones.	OPTION 3: Provide for restricted activity status up to the 80 person limit option in the Plains Production zone (and non-complying beyond this) and for an unlimited floor area in the Industrial zones.
<ul style="list-style-type: none"> - Environmental - Economic (incl. on economic growth & employment) - Social - Cultural 	<p>If development can occur anywhere on the site up to the 80 person maximum as a permitted activity this could lower the economic return from the property.</p> <p>This option would not allow adjoining property owners who may be affected by the location of the building development to be considered.</p> <p>This option has the least cost in terms of consenting (as no consent would be required up to the 80 person limit) in the Plains Production Zone, or in the Industrial zones.</p>	<p>This option could also lower the economic returns from the property.</p> <p>This option could result in effects on adjoining property owners not being able to be appropriately mitigated.</p> <p>This option has the lowest consenting costs for the Industrial Zones.</p>	<p>This option could also lower the economic returns from the property.</p> <p>In terms of the costs to obtain consent, this option has the highest cost for the Plains Production Zone.</p>
BENEFITS Effects anticipated from implementation, including: <ul style="list-style-type: none"> - Environmental - Economic (incl. on economic growth & employment) - Social - Cultural 	<p>The benefits of this option include;</p> <ul style="list-style-type: none"> • Providing certainty for the landowner. • No application costs • That it is the most rapid option for reducing the pressure on the rental housing market. 	<p>The benefits of this option include;</p> <ul style="list-style-type: none"> • Providing certainty for the landowner. • The ability to impose conditions to mitigate any adverse environmental effects. • Reducing pressure on the existing rental market within the district. 	<p>The benefits of this option include;</p> <ul style="list-style-type: none"> • Ensuring that the environmental effects can be appropriately considered. • Providing certainty for landowners as to the matters that will be assessed in the resource consent application. • Reduces pressure on the existing rental market within the district. • Allows for the decline of the application if the environmental effects are unable to be mitigated by conditions. • Provides direction that the larger accommodation facilities with the greater level of effects are more appropriately located in the industrial zones.
EFFICIENCY In achieving: <ul style="list-style-type: none"> - the purpose of the Proposal; and - existing relevant objectives of the District Plan. 	<p>An inefficient way of achieving the Proposal and objectives of the Plan.</p>	<p>A moderately efficient way of achieving the Proposal and objectives of the Plan.</p>	<p>This is a true effects based approach whereby the effects of the development on the environment can be appropriately assessed and at the same time there is a level of certainty for the applicant.</p> <p>An efficient way of achieving the Proposal and objectives of the Plan.</p>
OVERALL APPROPRIATENESS In achieving: <ul style="list-style-type: none"> - the purpose of the Proposal; and 	<p>Not Appropriate</p>	<p>Appropriate</p>	<p>Highly Appropriate</p>

	OPTION 1: Retain permitted activity status up to the 80 person limit option in the Plains Production zone (and restricted discretionary beyond this) and for an unlimited floor area in the Industrial zones.	OPTION 2: Controlled activity up to the 80 person limit option in the Plains Production zone (and restricted discretionary beyond this) and for an unlimited floor area in the Industrial zones.	OPTION 3: Provide for restricted activity status up to the 80 person limit option in the Plains Production zone (and non-complying beyond this) and for an unlimited floor area in the Industrial zones.
- existing relevant objectives of the District Plan.			
RISK OF ACTING OR NOT ACTING (if uncertain or insufficient information)	N/A (information is sufficient and certain).	N/A (information is sufficient and certain).	N/A (information is sufficient and certain).
CONCLUSION: The above evaluation identifies that Option 3 is the most efficient and effective option in meeting the purpose of the proposal and the objectives and policies of the proposed district plan.			

7.2.5.4 Evaluation of Options

Table 3: Issue: Consideration of Most Appropriate Location of Models

	OPTION 1: No change Retain the Seasonal Accommodation Rule PP9 so that seasonal workers accommodation remains a permitted activity up to a maximum floor area of 125m² the Plains Production zone and is permitted within the residential zones to an informal threshold level.	OPTION 2: Providing for seasonal workers accommodation only on the site for which they are required (Plains Production zone sites)	OPTION 3: Providing for seasonal workers accommodation in a mix of zones according to scale.
EFFECTIVENESS In achieving: <ul style="list-style-type: none"> - the purpose of the Proposal; and - relevant objectives of the District Plan. 	<p>This option cannot be considered effective in achieving the purpose of the proposal as it has not been meeting the needs of the Recognised seasonal employers.</p> <p>The maximum floor area of 125m² in the Plains Production zone does not provide sufficient scope to employers to cater for the number of seasonal workers required for their properties.</p> <p>Furthermore this option requires resource consent for a non-complying activity for seasonal accommodation in the Industrial zones.</p> <p>It also provides inadequate certainty as to what is able to be accommodated in the Residential Zones as a permitted activity.</p>	<p>Option 2 would assist in meeting the purpose of the proposal as it would provide for the accommodation needs sought by the Recognised seasonal employers, but it would not be effective in meeting the relevant objectives of the Plains Production zone namely <i>PPO1 to ensure that versatile land across the Plains Production Zone is not fragmented or compromised by building and development</i>. If the demand for seasonal worker accommodation is only met on the site where they are required, this will lead to a proliferation of residential housing on the valuable versatile soils of the district.</p> <p>Policies PP3 and PPP4 recognise effects caused by this in noting that limits on the number and scale of buildings will be imposed, and that buildings accessory to land based primary production are enabled “... where they are not of such a scale as to adversely affect the life supporting capacity of the versatile land resource and which are consistent with the rural character of the zone.”</p> <p>This option is not considered to be an effective option as it would potentially create significant adverse effects on the Plains Production zone and would therefore not achieve the aspect of the Proposal requiring protection of the soils resource, nor key existing objectives of the Proposed District Plan.</p>	<p>Providing for seasonal workers accommodation through a mix of sizes /scale across different zones is an effective way of meeting both the purpose of the proposal and the relevant objectives of the different zones in the District Plan.</p> <p>This option allows the purpose of providing for seasonal worker accommodation but at different scales across different zones.</p> <p>This option is consistent with the different objectives of the zones where the scale of the accommodation is set to ensure that the effects on the environment are no more than minor.</p>
COSTS Effects anticipated from implementation, including: <ul style="list-style-type: none"> - Environmental - Economic (incl. on economic growth & employment) - Social - Cultural 	<p>The principal cost of this option is the need to apply for a non-complying resource consent application.</p> <p>There could be social and cultural costs associated with the having workers dispersed over a large number of properties.</p> <p>This option will not reduce the social costs associated with the seasonal workers occupying rental housing within the residential zones, where there is an existing shortage.</p>	<p>The highest cost associated with this option are the environmental costs that would arise through the loss of versatile land.</p> <p>There could also be environmental costs resulting from the on-site servicing of large complexes in the Plains Production zone.</p> <p>This option could also lower the economic returns from the property.</p> <p>This option could result in effects on adjoining property owners not being able to be appropriately mitigated.</p>	<p>The cost of transporting between different properties to places of work.</p> <p>This option could also reduce the amount of land in zones that have a primary focus on other activities eg industry.</p>

	OPTION 1: No change Retain the Seasonal Accommodation Rule PP9 so that seasonal workers accommodation remains a permitted activity up to a maximum floor area of 125m² the Plains Production zone and is permitted within the residential zones to an informal threshold level.	OPTION 2: Providing for seasonal workers accommodation only on the site for which they are required (Plains Production zone sites)	OPTION 3: Providing for seasonal workers accommodation in a mix of zones according to scale.
BENEFITS Effects anticipated from implementation, including: <ul style="list-style-type: none"> - Environmental - Economic (incl. on economic growth & employment) - Social - Cultural 	The benefits of this option include; <ul style="list-style-type: none"> • Economic savings for the Council by not having to make changes to the District Plan. 	The benefits of this option include; <ul style="list-style-type: none"> • Providing certainty for the landowner. • Social and Cultural benefits of having all of the workers on-site. • Reducing pressure on the existing rental market within the district. • Keeps industrial land for that purpose. 	The benefits of this option include; <ul style="list-style-type: none"> • Ensuring that the environmental effects can be appropriately considered. • The larger scale seasonal workers camp model being located within the industrial zone can be connected to council infrastructure thereby ensuring that the effects of on-site servicing can be avoided. • Providing certainty for landowners as to the matters that will be assessed in the resource consent application. • Reduces pressure on the existing rental market within the district. • Provides direction that the larger accommodation facilities with the greater level of effects are more appropriately located in the industrial zones.
EFFICIENCY In achieving: <ul style="list-style-type: none"> - the purpose of the Proposal; and - existing relevant objectives of the District Plan. 	An inefficient way of achieving the Proposal.	An inefficient way of achieving the Proposal and objectives of the Plan.	This is a true effects based approach whereby the effects of the development on the environment can be appropriately assessed and at the same time there is a level of certainty for the applicant. An efficient way of achieving the Proposal and objectives of the Plan.
OVERALL APPROPRIATENESS In achieving: <ul style="list-style-type: none"> - the purpose of the Proposal; and - existing relevant objectives of the District Plan. 	Not Appropriate	Not Appropriate	Highly Appropriate
RISK OF ACTING OR NOT ACTING (if uncertain or insufficient information)	N/A (information is sufficient and certain).	N/A (information is sufficient and certain).	N/A (information is sufficient and certain).
CONCLUSION: The above evaluation identifies that Option 3 is the most efficient and effective option in meeting the objectives of the proposal and the objectives and policies of the proposed district plan.			

	OPTION 1: No change Retain the Seasonal Accommodation Rule PP9 so that seasonal workers accommodation remains a permitted activity up to a maximum floor area of 125m ² the Plains Production zone and is permitted within the residential zones to an informal threshold level.	OPTION 2: Providing for seasonal workers accommodation only on the site for which they are required (Plains Production zone sites)	OPTION 3: Providing for seasonal workers accommodation in a mix of zones according to scale.

7.2.5.5 Evaluation of Options

Table 4 Issue of Seasonal Worker Accommodation in the Residential Zone

	OPTION 1: Amend the definition of Residential activity to include seasonal worker accommodation with limits set for the number of seasonal workers.	OPTION 2: Retain the status quo where seasonal worker accommodation is treated as a residential activity with no specific limit set down in the District Plan.	OPTION 3: Make seasonal worker accommodation a restricted discretionary activity in the residential zones, with discretion exercised around scale.
EFFECTIVENESS In achieving: <ul style="list-style-type: none"> - the purpose of the Proposal; and - existing relevant objectives of the District Plan. 	<p>The purpose of the plan change is “to provide for the accommodation resource needs for seasonal workers, to assist with, and at the same time protect, the sustainable management of the natural and physical resources of the Heretaunga Plains and reduce the pressure on the existing residential rental stock.”</p> <p>This option is partially effective in meeting the purpose of the proposal in that it helps to meet the needs of seasonal workers while keeping the pressure off Plains Production zoned land. What it is not entirely successful in achieving, is reducing the pressure on the existing housing stock. However putting a limit on the number of seasonal workers able to be accommodated that is complementary to that anticipated within residential areas will assist with not giving any competitive advantage to seasonal workers making them more financially attractive to landlords.</p> <p>This option is highly effective in ensuring that the effects of both seasonal workers accommodation and residential dwellings of the same scale (which are very similar) are managed in the same way.</p> <p>This option is effective in meeting the objectives of the residential zone particularly Objective RO1 <i>To enable a diverse range of housing that meets the needs of the community while offering protection to the amenity of neighbouring properties and the local environment.</i></p>	<p>As for Option 1 the retention of the status quo is not effective in meeting the purpose of the proposal as there are currently problems with the seasonal workers accommodation removing much needed properties from the rental market. However it would be partially effective in that it would assist with ensuring that there is little pressure on the Plains Production zone.</p> <p>This option is not effective in meeting the objectives of the Residential zone as it could result in a degradation of the amenity levels of the residential environment where the scale of the activity could far exceed that of what is accepted as a normal residential activity.</p>	<p>Option 3 will be partially effective in meeting the purpose of the proposal in that, by requiring resource consent for seasonal workers accommodation within the general residential zone this will take pressure off the existing residential rental stock.</p> <p>It may also be effective in protecting the Plains Production zone through providing a real alternative to on site accommodation models although it is likely that the scale that would be appropriate in the residential environment is likely.</p>
COSTS Effects anticipated from implementation, including: <ul style="list-style-type: none"> - Environmental - Economic (incl. on economic growth & employment) - Social - Cultural 	<p>The costs associated with this option are around the economic impacts on the employers who will be limited on the scale of the accommodation they can provide in a the Residential zones as a permitted activity. Alternative locations for larger scale worker accommodation would need to be sourced, likely at greater</p> <p>There could be social and cultural costs if workers from the same island villages have to be split because of site limits on numbers.</p>	<p>The effects of the status quo are around the environmental effects of having an unlimited number of workers on site, that would impact on the amenity and character of the residential zone.</p> <p>Being able to provide for a large number of workers on-site would also have costs associated with the removal of properties from the general rental market thereby exacerbating the already short supply.</p>	<p>The costs that are likely to be experienced through the implementation of this option are those associated with the employers having less certainty for the placement of their employees and also the financial costs associated with applying for resource consent application and the conditions that may be imposed.</p> <p>There could also be costs to the environment if the correct range of matters to which discretion is restricted are not properly identified.</p>
BENEFITS Effects anticipated from implementation, including:	<p>The benefits of Option 1 are that it provides a greater level of certainty both for the employers and also for residential property owners about the scale of development that can occur within the zone. The environmental effects will be no</p>	<p>This option has benefits of not placing restrictions on the RSE employers and thereby not placing any restrictions on the economic growth of the district.</p>	<p>This option has benefits through ensuring that the identified effects of the accommodation on the residential environment are properly considered.</p>

	OPTION 1: Amend the definition of Residential activity to include seasonal worker accommodation with limits set for the number of seasonal workers.	OPTION 2: Retain the status quo where seasonal worker accommodation is treated as a residential activity with no specific limit set down in the District Plan.	OPTION 3: Make seasonal worker accommodation a restricted discretionary activity in the residential zones, with discretion exercised around scale.
<ul style="list-style-type: none"> - Environmental - Economic (incl. on economic growth & employment) - Social - Cultural 	<p>greater than those of a normal residential activity and the character and amenity of the residential zone will remain intact.</p> <p>This scale of development could also have the benefit of not having a competitive advantage over the normal rental market.</p> <p>This option will also assist with channeling the larger accommodation models to the industrial and rural zones.</p>		<p>It also provides social benefits by ensuring that the effects on adjoining property owners are considered through the Matters set out in Section 95 of the Resource Management Act.</p> <p>The option provides certainty to the RSE employers of the process that must be followed.</p>
EFFICIENCY In achieving: <ul style="list-style-type: none"> - the purpose of the Proposal; and - existing relevant objectives of the District Plan. 	Efficient	Inefficient.	The effects of small scale seasonal workers accommodation are likely to be no different to those of any other residential activity and this lowers the efficiency of this option.
OVERALL APPROPRIATENESS In achieving: <ul style="list-style-type: none"> - the purpose of the Proposal; and - existing relevant objectives of the District Plan. 	Highly appropriate	Inappropriate	Moderately Appropriate
RISK OF ACTING OR NOT ACTING (if uncertain or insufficient information)	N/A (information is sufficient and certain).	N/A (information is sufficient and certain).	N/A (information is sufficient and certain).
CONCLUSION: The above evaluation demonstrates that Option 1 which sets limits on the number of seasonal workers provided for as a permitted activity in the Residential Zones is an efficient and effective way to manage seasonal worker accommodation within these zones. Option 1 is considered the most appropriate way to achieve the purpose of the proposal in that it provides for seasonal worker accommodation within the residential zones but at a scale that does not create a level of effects that is uncharacteristic of residential environments and would unfairly compete with the residential rental market.			

Table 5 Issue : Servicing Limits for Wastewater at Irongate

	OPTION 1: Retain the status quo whereby seasonal worker accommodation remains as non-complying at Irongate.	OPTION 2: Limit the range of activities that are provided for in the general industrial zone at Irongate to ensure that the activities are compatible with the limits of the wastewater network. This would result in seasonal workers accommodation being a non-complying activity.	OPTION 3: Establish a threshold for the volume of wastewater discharge from a site at Irongate and provide for seasonal worker accommodation as a restricted discretionary activity in the zone, with a requirement to meet the performance standard and non-complying if the threshold standard is exceeded.
EFFECTIVENESS In achieving: <ul style="list-style-type: none"> - the purpose of the Proposal; and - existing relevant objectives of the District Plan. 	<p>The purpose of the plan change is “to provide for the accommodation resource needs for seasonal workers, to assist with, and at the same time protect, the sustainable management of the natural and physical resources of the Heretaunga Plains and reduce the pressure on the existing residential rental stock.”</p> <p>The status quo option is not effective in meeting the purpose of the proposal as the non-complying status signals that the activity is not one that is contemplated in the zone and making provision for seasonal workers is an imperative for the district with the number of workers projected to double over the next 3 years. Without the availability of industrial zones for the larger scale developments that are required this will place unsustainable pressure on the Residential environment and versatile land within the Plains Production zone.</p> <p>This option is not effective in meeting the objectives of the industrial zone especially Objective IZO4</p>	<p>As for Option 1 this is not an effective option for meeting the purpose of the proposal as the non-complying status signals that the activity is not one that is contemplated in the zone and making provision for seasonal workers is an imperative for the district with the number of workers projected to double over the next 3 years.</p> <p>This option would be partially effective in meeting the objectives of the industrial zone especially Objective IZO4</p> <p>While the option would meet objective IZO4 in providing for new industries, identifying particular industries that may be compatible with the wastewater infrastructure in place, is picking winners and industries that could be compatible may be excluded. This is not the most efficient or effective method of achieving the objective.</p>	<p>Option 3 will be effective in meeting the purpose of the proposal in that, by providing for seasonal workers accommodation within the general industrial zone at Irongate this will take pressure off the existing residential rental stock.</p> <p>It will also be effective in protecting the Plains Production zone through providing a real alternative to on site accommodation models. However the effectiveness will be slightly reduced by the wastewater threshold limiting the full development potential of some sites.</p> <p>This option will be effective in meeting the objectives of the industrial zone especially Objective IZO4 <i>To enable the efficient and effective use and the sustainable management of the District’s resources by providing for the development of new industries in accordance with the Hastings Industrial Strategy.</i></p> <p>The threshold set for wastewater at Irongate will ensure that the wastewater infrastructure provided for at Irongate will be sustainable for the activities provided for in the zone.</p>
COSTS Effects anticipated from implementation, including: <ul style="list-style-type: none"> - Environmental - Economic (incl. on economic growth & employment) - Social - Cultural 	<p>A non-complying activity signals that the activity is not an appropriate one for the zone. The costs that are likely to be experienced through the implementation of this option are those associated with the employers having to put forward justification for the activity being appropriate in the zone and as a result having less certainty for the placement of their employees. There is also the financial costs associated with applying for resource consent application and the conditions that may be imposed.</p> <p>This may produce negative sentiment for economic growth and employment with less certainty for RSE employers on where the larger models of accommodation might be located.</p> <p>This option could also place greater environmental pressure on the Omaha General Industrial zone, which would be the only alternative location.</p>	<p>As for Option 1 the main costs are those for seasonal employers who may wish to make application for a non-complying activity for seasonal workers accommodation within the zone.</p> <p>This option could also place greater environmental pressure on the Omaha General Industrial zone, which would be the only alternative location.</p> <p>There could also be lost opportunity costs if some activities are unjustifiably excluded from the zone.</p>	<p>The costs associated with this option are around the economic impacts on the employers who will be limited on the scale of the accommodation they can provide in the Irongate General Industrial zone.</p> <p>There will also be lost opportunity costs associated with the fact that there is lost opportunity of being able to utilise the entire area of the site if the maximum discharge level is exceeded but not all of the site is occupied.</p>

	OPTION 1: Retain the status quo whereby seasonal worker accommodation remains as non-complying at Irongate.	OPTION 2: Limit the range of activities that are provided for in the general industrial zone at Irongate to ensure that the activities are compatible with the limits of the wastewater network. This would result in seasonal workers accommodation being a non-complying activity.	OPTION 3: Establish a threshold for the volume of wastewater discharge from a site at Irongate and provide for seasonal worker accommodation as a restricted discretionary activity in the zone, with a requirement to meet the performance standard and non-complying if the threshold standard is exceeded.
BENEFITS Effects anticipated from implementation, including: - Environmental - Economic (incl. on economic growth & employment) - Social - Cultural	The benefits of Option 1 are that it recognises the infrastructure limitations at Irongate and it could have benefits for the environment with tailored conditions being applied to any non-complying activities that are applied for.	This option has benefits for the environment through identifying activities that are compatible with the environmental limits of the infrastructure that is in place.	This option has benefits through ensuring that the identified effects of the accommodation on the infrastructure are properly considered. It also provides social and cultural benefits by ensuring that options are available to registered seasonal employers so that they can reduce the impact on the residential rental stock. The option provides flexibility and choice to landowners and developers on the type of activity that can be accommodated on their site.
EFFICIENCY In achieving: - the purpose of the Proposal; and - existing relevant objectives of the District Plan.	Inefficient	Inefficient.	Efficient
OVERALL APPROPRIATENESS In achieving: - the purpose of the Proposal; and - existing relevant objectives of the District Plan.	Inappropriate	Moderately Appropriate	Appropriate
RISK OF ACTING OR NOT ACTING (if uncertain or insufficient information)	N/A (information is sufficient and certain).	N/A (information is sufficient and certain).	N/A (information is sufficient and certain).
CONCLUSION: The above evaluation demonstrates that Option 3 which establishes a wastewater threshold for activities within the Irongate area is an efficient and effective way to manage the effects of seasonal worker accommodation within this zone, by providing choice to landowners and developers. Option 3 is considered the most appropriate way to achieve the purpose of the proposal in that it provides for seasonal worker accommodation within the Irongate Industrial zone but at a scale that does not create a level of effects that is beyond the capacity of the infrastructure to support it.			

8 Risk of Acting or not Acting

Section 32 (2) (c) of the Resource Management Act requires that the assessment of the efficiency and effectiveness of the provisions in achieving the objectives must assess the risks of acting or not acting if there is insufficient information about the subject matter of the provisions.

In this case there is considered to be sufficient information, so this consideration does not arise.

9 Summary & Conclusions

Amending the provisions of the Proposed District Plan to provide for seasonal workers accommodation at a scale that meets the demands of stakeholders is required to ensure the sustainable management of the horticulture industry within the district. It has the added benefit of providing for the social wellbeing of the wider community through reducing the pressure on the existing rental housing resource.

This section 32 summary evaluation confirms the following:

1. That seasonal workers accommodation is an important requirement for the sustainable management of the horticulture industry within the district.
2. That seasonal workers accommodation can be provided for at the scale of development required by the industry without the need to adversely impact on the versatile land of the Heretaunga Plains.
3. That the provisions included through Variation 7 provide the certainty that is required for those landowners and businesses utilizing seasonal workers to service the horticulture industry while at the same time safeguarding the effects on versatile land and the Plains Production and Industrial environments.
4. Having a limit on the scale of seasonal worker accommodation, through limits on number of persons to be accommodated, in the residential zones will ensure that the amenity of the residential environment is maintained.
5. That the effects on infrastructure is a necessary factor in the consideration of the appropriateness of seasonal workers accommodation within the industrial zones.
6. Making specific provision for seasonal worker accommodation within the proposed district plan is the most appropriate way to provide for the sustainable management of the horticultural land resource and the social needs (housing) of the community.

Therefore, adoption of proposed Variation 7 to the Proposed Hastings District Plan is efficient, effective, and appropriate in terms of section 32 of the RMA and in achieving the objectives of the proposal and the purpose of the Resource Management Act.

Appendices

9.1

Providing Future RSE Accommodation Needs – Discussion Document ENV-9-18-4-18-109