

# Seasonal Workers Accommodation in Central Otago

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*Disclaimer: The report is work undertaken by students from the Planning Programme at the University of Otago and should in no way be seen to represent the views of the University of Otago.*

## Executive Summary

The purpose of this study was to address the Central Otago District Council's (CODC) objective of providing secure and affordable accommodation for seasonal workers in Central Otago, considering the requirements of both employees and the horticultural industry. Through engagement with key stakeholders such as seasonal workers, accommodation providers, employers, and local authorities, valuable insights regarding the viability of different types of accommodation in Cromwell, Roxburgh, and Alexandra were obtained, considering variations in land-use patterns and other externalities.

Additionally, the study identified on-site, and off-site challenges and opportunities associated with the provision of safe and affordable housing for seasonal workers. Understanding these factors is essential for formulating strategies and policies that effectively address housing shortages in this sector. By addressing the challenges and capitalising on the opportunities, it is possible to enhance the well-being of seasonal employees while satisfying the needs of the horticultural industry. This study's findings provide valuable recommendations and insights for the Central Otago District Council, guiding decision-making processes and facilitating the development of effective solutions to meet the demand for secure and affordable seasonal worker accommodation in Central Otago.

### 1.1 Research Questions

The purpose of this research is to provide the Central Otago District Council (CODC) with a report on how to best provide for the demand of safe, affordable seasonal worker accommodation in Central Otago that meets the needs of workers and the horticultural industries. The following research questions are aimed to guide us through the research process:

1. Does the viability of providing certain types of seasonal workers accommodation vary between Cromwell, Roxburgh, and Alexandra, due to differences in land-use patterns?
2. What are the on-site and off-site barriers and opportunities to providing safe and affordable seasonal workers accommodation?
3. What policies and strategies can be effectively implemented to alleviate the shortages of seasonal worker accommodation in Central Otago?

## 1.2 Research Process

This research process has broadly adopted a social constructivist and post structural lens, through a mixed method of predominantly qualitative data. Both primary and secondary data have been utilised. Primary data is in the form of semi-structured interviews and a survey questionnaire, via engagement with employers of seasonal workers, accommodation providers, Central Otago District Council members, as well as seasonal workers themselves. Secondary data has been gathered in the form of a literature review, media discourse, and policy analysis. It is important to note that this research focuses on seasonal workers primarily who are not a part of the Recognised Seasonal Employers (RSE) scheme.

## 1.3 Report Structure

The structure of the report is as follows:

### Chapter One: Introduction

- Sets the direction for the report, through an overview of the topic, aim, research questions, and research process.

### Chapter Two: Context

- An outline of the key research localities, environmental and social contexts, and background to the horticultural industry.

### Chapter Three: Literature Review

- A review of relevant literature to this study, incorporating key theoretical and social concepts, including temporary migration and temporal complexities within Central Otago.

### Chapter Four: Methodology

- An outline of the key research methods and theoretical framework utilised to address the research objectives and questions.

#### Chapter Five: Media Discourse

- An analysis of media outlets (national, regional, and local news) through a Foucauldian lens to expose the power dynamics in the discourse surrounding seasonal worker accommodation.

#### Chapter Six: Policy Analysis

- An analysis of relevant legislative context at a national, regional, and local levels that are relevant to seasonal worker accommodation.

#### Chapter Seven: Results

- A presentation of the key research findings and identification of key themes.

#### Chapter Eight: Discussion

- An analysis of the key research findings, with reference to relevant literature.

#### Chapter Nine: Recommendations

- A series of five key policy and non-policy recommendations based on the research conducted.

#### Chapter Ten: Conclusion

- Concluding statements.

#### 1.4 Recommendations

The following recommendations are made to the Central Otago District Council regarding Seasonal Workers Accommodation:

- 1) Facilitate workshops between industry members and local government.
- 2) Form a stakeholder committee.
- 3) Additional Seasonal Accommodation Rules in the Rural Resource Zone of the Central Otago District Plan for on-site accommodation.
- 4) Accommodation Guidelines for safe and healthy housing.
- 5) Establish a formalised campground with the provision of cooking, shower and toilet facilities for seasonal workers.

## Acknowledgements

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## List of Abbreviations

AS/NZS	Australian Standard / New Zealand Standard
CODC	Central Otago District Council
KI	Key Informant
GI	General Industrial
LI	Light Industrial
LIAO	Light Industrial Area Outcomes
LCDB	New Zealand's Land Cover Data Base
LINZ	Land Information New Zealand
LIZP	Light Industrial Zone Policy
GDD	Growing Degree Days
GIS	Geographic Information System
GRUZ	General Rural Zone
NPS-HPL	National Policy Statement on Highly Productive Land
NES	National Environment Standard
ORL	Other Rural Landscapes
PALM	Palm Australia Labour Mobility

PP	Plain Production
PC	Plan Change
PWC	Price Waterhouse Coopers
RMA	Resource Management Act
RSE	Recognised Seasonal Employer
RPROZ	Rural Production Zone
RPS	Regional Policy Statement
RuRa	Rural Resource Area
SAWP	Seasonal Agricultural Worker Program
UFD	Urban Form & Development



## Chapter 1 & 2: Introduction & Context

The Central Otago District is a significant productive region within Aotearoa New Zealand in terms of horticultural activity. The area's semi-continental climatic conditions, containing intensely hot and dry summers, alongside semi-arid soils, create the ideal conditions for horticultural activities to thrive (Horticulture New Zealand, 2021). As a result, Central Otago has one of the highest concentrations of horticultural activity in Aotearoa, containing 60% of planted stone fruit orchards in the country (McLeod & Mare, 2013). Horticultural activity peaks throughout the summer months of December, January, and February, however, can range throughout the year based on the type of work. Consequently, the Central Otago region is susceptible to an influx of workers throughout the peak period, including migrant workers as part of the 'Recognised Seasonal Employer' (RSE) scheme, as well as backpackers, students, and seasonal agricultural workers. The population of the region can therefore increase by 5000 people throughout the summer months (PickNZ, n.d).

As a result of peak horticultural activity coinciding with peak tourism for the region, a general lack of safe and affordable accommodation to house seasonal workers has been experienced throughout the summer months. Additionally, the short time period that is required for seasonal workers creates barriers in providing accommodation options that are economically viable and do not remain empty for lengthy periods of the year. There are several different accommodation types for seasonal workers within Central Otago, including on-site at orchards, as well as off-site options. On-site commonly includes re-locatable cabins, houses, or areas provided for camping or parking cars and vans. Off-site accommodation can be in the form of multi-use complexes, freedom camping, or campsites that allow for relocatable cabins or formal camping grounds. Despite these options, the prevalent issue regarding lack of accommodation for seasonal workers continues to persist.

The district is characterised by its unique geographical features, and has a raft of social, historical and socio-economic differences across various settlements within Central Otago. For this reason, this research focuses on three distinctive settlements within the district which considers the broad range of differences within Central Otago. This chapter will provide contextual information about the three chosen areas of analysis in respect to this research topic:

Cromwell, Roxburgh and Alexandra, as well as providing an overview of the district and the horticultural industry.

## 2.1 The Central Otago District

Central Otago stretches over 11,000km<sup>2</sup> of land, from Raes Junction in the south to the Lindis Pass in the north (CODC, 2023). The district is renowned for its vast landscapes and topography, including snow covered craggy mountain ranges, golden undulating hills, and sprawling tussock high country. As of the 2018 census, there were 21, 558 people residing in the district, with a median age of 46.5 years and a median income of \$33,000 NZD.



*Figure 2.1: Map of the Central Otago Region (Google Maps, 2023).*

Central Otago plays an important part in Aotearoa’s gold mining history, and in turn, the gold rush has in part characterised the history and landscapes we see in the district now. In the early 1860’s, prospectors flocked to the district in hopes of reaping some of the Otago alluvial gold,

which comes from the prevalent schist mountains. A handsome amount of gold deposits had been discovered in the Dunstan Gorge, and by 1863 there were approximately 40,000 diggers prospecting in the district from China, America and Europe. Many of these migrants stayed after the gold rush, and this migration has shaped the character of the Central Otago district. Many of Central Otago's townships now draw tourism activity in part because of the rich gold mining history. The Otago Central Rail Trail runs through the district and has successfully used the district's gold heritage to support the tourism industry. The major industrial activities for the district in the last 100 years have been associated with farming, viticulture and horticulture, however the film industry and recreational tourism have burgeoned in recent years and continue to grow.

### **2.1.1 Mana Whenua**

Te Rūnanga o Ngāi Tahu is the recognised iwi authority across Central Otago. Ngāi Tahu have a long and rich history in the district, where mahinga kai and pounamu resources were collected, and used to support their people. The Lindis Pass (between Cromwell and Omarama) was a well frequented route by Ngāi Tahu, and many of the natural landscapes of Central Otago are culturally significant for the iwi (Te Rūnanga o Ngāi Tahu, 2005).

### **2.1.2 Overview of key research localities**

Three key research localities have been selected in order to explore how issues regarding seasonal workers' accommodation vary over the range of townships in Central Otago. Each location is unique in terms of geography, population and land use. This provides the research with a broader understanding of the available seasonal accommodation solutions across the district.

#### **2.1.2.1 Cromwell**

Cromwell is located between the Kawarau River and Lake Dunstan in the Cromwell Basin. The town is a hub for tourism in the district, with a heritage precinct that celebrates the town's gold mining history, as well as Cromwell's proximity to a range of cycle trails and wineries. Cromwell has a population of approximately 5,610 people, and the township is described by Stats NZ (2018) New Zealand as a small urban area with a median income of approximately 37,500 (Stats NZ, 2018). The town features a range of retail shops, cafes, bars, two

supermarkets and a library. Additionally, Cromwell is home to an Otago Polytechnic campus, which has a range of courses available, including brewing, horticulture, and agriculture (Otago Polytechnic, n.d).

Cromwell is the closest out of the three research areas to the Queenstown-Lakes District, and within an hour's drive of the township there are several ski fields (CODC, n.d).

### **2.1.2.2 Alexandra**

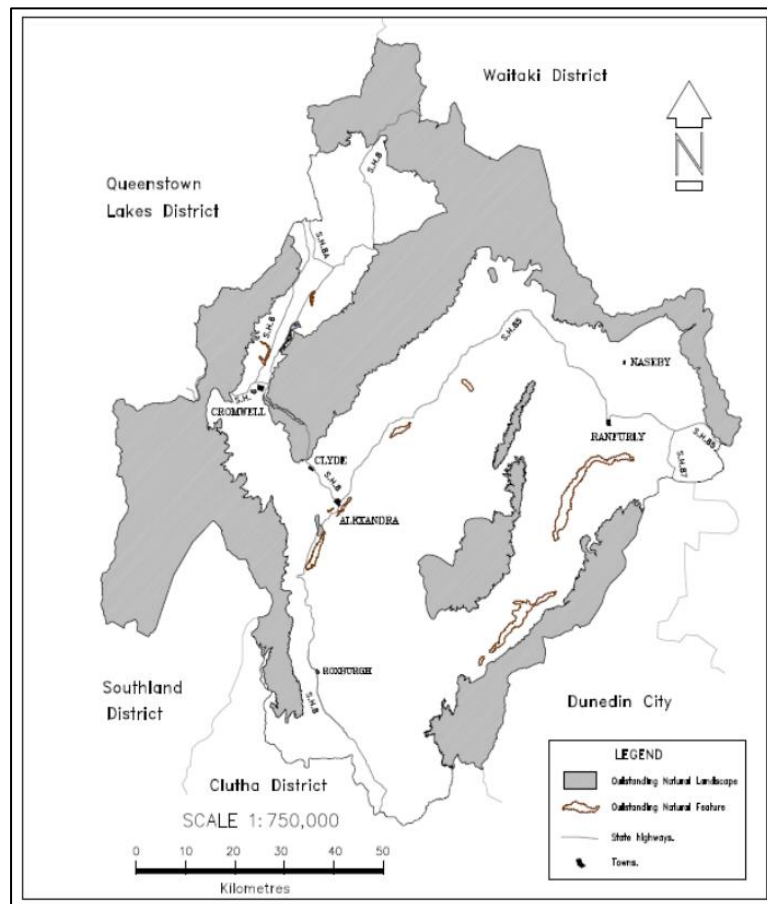
Alexandra is approximately 35km from Cromwell and is located near the centre of the district at the junction of State Highway 8 and State Highway 85, between the Clutha / Mata-Au and Manuherikia rivers. Alexandra has a population of approximately 5472 people, and a median income of approximately \$30,000 (Stats NZ, 2018). The average weekly rent is around \$280-\$300 (Stats NZ, 2018). Alexandra is known for its extreme weather changes, being known as the hottest, driest and coldest town in New Zealand (CODC, n.d). Surrounding the township is a range of orchards and wineries. Like Cromwell, Alexandra has a mix of restaurants, bars and retail businesses, mostly located on the main street of the town centre, which is the state highway 8, and is used as the main route for vehicles travelling through the district to Cromwell, or as a connection south to Roxburgh. The small township of Clyde is located 7.5km Northwest of Alexandra, and this area is the start or end point for the Central Otago Rail Trail, which attracts more than 15,000 people every year (CODC, n.d).

### **2.1.2.3 Roxburgh**

Roxburgh is the smallest of the research localities, with a population of 588 people. Roxburgh is located on the banks of the Clutha River and is roughly 41km south of Alexandra. Roxburgh has a significantly smaller range of hospitality and retail businesses in comparison to Alexandra and Cromwell. It has one main street, which is the key hub for the township. It has a limited range of services and is distinctly more rural in character than Cromwell and Alexandra. It has a range of fruit and vegetable producers located on the outskirts of the residential area of Roxburgh.

## 2.2 Outstanding Natural Landscapes

The district has several outstanding natural features and outstanding natural landscapes, which are listed in the Central Otago District plan, and which are shown in figure 2.2.



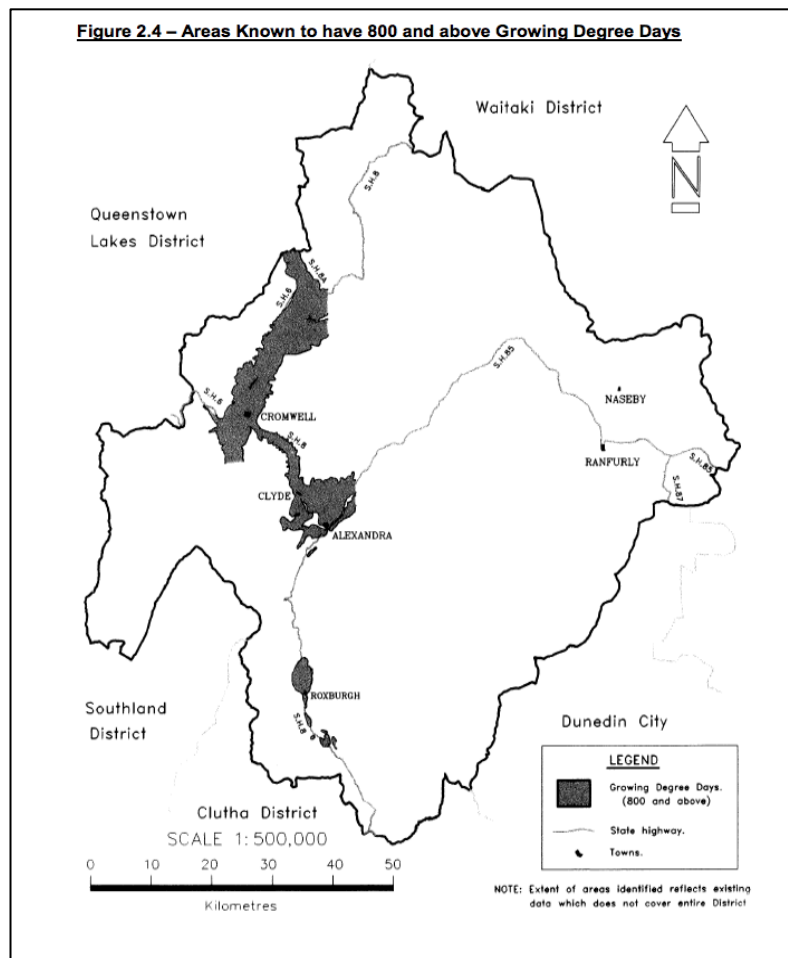
*Figure 2.2: Outstanding natural landscapes and natural features as shown in the Central Otago District Plan*

Alongside these, and of most importance to this research concerned with seasonal work, are the landscapes identified as “Other Rural Landscapes” under the district plan. These landscapes are any areas within the Rural Resource Area that are not listed as outstanding landscapes or significant amenity landscapes. All, if not most vineyards and orchards are located within the Rural Resource Zone, and therefore are classed as Other Rural Landscapes. Orchards and vineyards have been identified as enhancing the landscape values of the semi-arid District. As explained in the Central Otago District Plan, the unique landscape is a major reason why people are drawn to living in and visiting the district, showing the significant contribution that seasonal

industries provide to the region. The implications of the landscape character of the district on seasonal workers accommodation is discussed further in chapter 6: Policy analysis.

### 2.3 Central Otago Horticultural and Viticultural Industries

Situated in the rain shadow of the Southern Alps, the Central Otago District experiences the driest climate in all of New Zealand, characterized by semi-arid conditions and significant temperature fluctuations (CODC). Some areas of the district have been identified as Special Land Resources, where the climate, soil structure, and availability of water is conducive to horticultural growing activities, especially summer fruits such as cherries, apricots and nectarines. These areas that have the special qualities that are suitable for horticultural and viticultural production, shown in figure x. Growing Degree Days (GDD) means the amount of warmth available for plants and insects to grow, therefore higher GDD is a key factor in supporting productive industries such as horticulture and viticulture.



*Figure 2.3: Map of areas with 800+ growing degree days as shown in the Central Otago District Plan*

As shown in Figure 2.3 above, the three areas that this research focuses on are all within the 800+ GDD.

The following areas have been identified in the Central Otago District Plan as principle localities for horticulture in the district:

the southern end of the Upper Clutha and Manuherikia Valleys;

- Ripponvale,
- Bannockburn
- Lowburn
- Earnsclough
- Clyde and north of Alexandra
- Teviot area from Coal Creek to Island Block

Principle Localities for Viticulture include the following:

- Kawarau Gorge/Bannockburn area
- Cairnmuir
- Ripponvale area, the Wanaka Road (State Highway 6)
- Alexandra

Central Otago's viticulture and horticulture industries significantly contribute to the area's economic prosperity and have also enhanced its reputation as a key wine and fruit producing district in New Zealand.

### **2.3.1 Projected Growth in the horticultural industry**

The horticultural industry in Central Otago continues to grow, partially driven by new large-scale planting of cherries in the district (Thrive Consulting, 2021). Between 2020/21 and 2025/26, the horticultural planted area in Central Otago is expected to increase by 15%. This growth is predicted to require additional workers in the area, and it has been estimated that peak labour demand (December/January) in 2025/2026 will be 6350 staff, up from 5035 in

2021. Additionally, the viticulture sector labour requirement is expected to grow in the peak harvest period of March/April to 1216 required staff., up from 975 in 2020/21 (Thrive Consulting, 2021).

### **2.3.2 Growth Implications on Seasonal Workers Accommodation**

This projected growth triggers the requirement for increased seasonal workers accommodation. According to a 2021 report undertaken by Thrive Consulting for the Central Otago District council, there was an 89% increase in available beds for seasonal workers, however this included campsites and it is unclear how this was measured, and whether this denoted beds that were specifically for seasonal workers, or generally available across the district. This report has also identified key barriers to providing seasonal accommodation in the district to meet this growth, including the closure of some backpacker accommodation due to the COVID-19 pandemic, as well as the closure of the Top 10 Holiday Park in Cromwell which resulted in subdivision for residential development. Overall, there is an expected shortfall of 859 beds in 2025/26 for the horticulture sector and 883 for the viticulture sector respectively (Thrive Consulting, 2021).



## Chapter 3: Literature Review

This chapter will explore existing literature in the field of temporary migration, social capital and precarious employment in relation to rural and small-town settings. Precarious employment among seasonal workers, as well as spatial complexities of precarity within rural areas is also discussed to highlight the connection between precarity and physical geography. This is done in an attempt to gain an in-depth understanding of the relevant key concepts, as well as identifying key gaps within literature. This section concludes by summarizing key findings and emphasizing the need for comprehensive approaches to resolve the complexities that arise within temporary migration.

### 3.1 Temporary Migration

This section provides a brief overview of the concept of temporal migration, highlighting the role of seasonal workers in the horticulture industry and examines the economic and spatial implications of this migratory pattern in various regions of Aotearoa New Zealand. Temporal migration as defined by Triandafyllidou (2022), refers to the phenomenon of individuals or groups of people migrating to a different country or region for a limited or specified period. Temporal migration is often affiliated with seasonal industries, typically arising in industries such as tourism, agriculture, construction, and hospitality (McLeod & Mare, 2013). These industries often require a fluctuation in labour requirements due to factors such as weather, harvest seasons or tourist influx. It is precisely these factors that ultimately shape the implementation of seasonal employment in these industries (Geremew & 2018). In this sense, temporal migration encompasses seasonal workers. Seasonal workers migrate from within the country, or from a different country, for a temporary period, this is typically during a specific season or peak demand period (Foulkes, 2023). These workers are employed to address fluctuations in workload, or to meet increased demand during certain times of the year when businesses or industries experience a surge in activity. Overall temporal migration serves as a crucial mechanism for industries that experience a fluctuation in labour needs and temporary migration fills employment gaps, ultimately contributing to successful economic operation of seasonal industries during specific periods of heightened activity.

Research conducted by Mcleod and Mare (2013), claim that temporary migrants represent a growing source of employment in certain sectors of the New Zealand labour market, particularly in agriculture, horticulture, and hospitality related industries. This growth has coincided with strong economic growth and associated skill and worker shortages (Mcleod & Mare, 2013). Temporary migrants that relocate to New Zealand, come from a variety of countries, and remain in New Zealand under a variety of immigration categories, including international students, skilled workers, working holidaymakers, seasonal agricultural workers from other countries or within New Zealand (Bedford, et al, 2001), as well as workers under the Recognised Seasonal Employer (RSE) scheme. The horticulture sector has emerged as one of the key employers of seasonal workers in Aotearoa, being a significant work destination for RSE workers from Pacific nations, as well as working holiday makers and New Zealand citizens who migrate domestically. The horticulture industry has distinct seasonal patterns, with the peak demand season occurring throughout the summer months of December, January, and February, but can range throughout the year based on the type of work (Hudson, 1950).

The key centres in New Zealand which tend to attract the highest number of seasonal workers include Central Otago, Hawkes Bay, Bay of Plenty, and the upper South Island, encompassing the Marlborough and Tasman regions (Mcleod & Mare, 2013). Studies show that fruit crops are predominantly grown in these regions in response to specific soil and climate conditions (Bussell & Mckennie, 2014), (Mcleod & Mare, 2013) (Hudson, 1950). Horticulture New Zealand claims that the combination of soil and climate in Central Otago means that it is especially suited towards growing high quality crops (Horticulture New Zealand, 2021). The region is nationally recognised for its unique productive capacity and place in the national food supply network. Central Otago has one of the highest concentrations of horticultural activity in New Zealand, establishing itself as the main commercial growing area in New Zealand containing 60% of planted stone fruit orchards in the country (Mcleod & Mare, 2013). These findings highlight the crucial role played by temporal migrants in meeting labour demands in various industries and regions of New Zealand, as well as the importance of horticulture as a key contributor to the country's economy. Ongoing research and attention to patterns is vital to understanding and management the employment labour market dynamic in New Zealand.

## 3.2 Temporary Migration to Small Towns

New Zealand's temporary migration in the context of seasonal workers most commonly benefits smaller towns, particularly in terms of certain industries such as horticulture, and during specific seasons. Woods (2018), notes that a large reason for this being that smaller towns lack the workforce required for seasonal work, therefore rely on seasonal workers. As well as this, the majority of agricultural or horticultural activity operates in close proximity to many of New Zealand's smaller towns (Alam et al., 2023).

An Australian case study conducted by Boese and Phillips (2017), highlights the importance of conditional belonging of temporary migrants in Regional Australia. Conditional belonging is considered a social and liminal state in which individuals are expected to demonstrate conformity to the group or community (De Waal, 2020). It is often regarded as a state of 'being, but not belonging', allowing the individuals to assimilate to obtain social mobility within the community (Aarset, 2018, p. 295). Boese & Phillip (2017) noted that smaller regional towns in Australia were becoming a popular destination for temporary workers in the form of skilled temporary visa holders, working holiday visa holders, as well as international students (Baese & Phillips, 2017). However, the study states that little attention has been paid to social and cultural connections of temporary migrants and their significance for feelings of place-based belonging, therefore, literature of this kind is scarce and largely uncommon.

Within this study, the social dimension of belonging was mostly linked to interpersonal relations that migrants or seasonal workers established with members of the local community, stating that this was a key aspect of workers' feeling of belonging (Boese & Phillips, 2017). Through engagement with the wider community, temporary migrants were able to build connections to enhance social support and access to resources and facilities. To a large extent, this created a sense of belonging and acceptance. Friendliness and openness of local residents and communities were considered crucial to temporary migrants, along with interactions with fellow migrants or workers whom they could create connections and relationships with. This produces a strong sense of community and support network within migrants and workers themselves, as they tend to share a common and familiar experience. Feelings of belonging were also enhanced in the economic realm, by a sense of contributing economically to the community. These feelings were explicitly acknowledged as benefits within regional towns compared to cities (Boese & Phillips 2017). In this sense, literature states that social capital in

relation to bonding, bridging, and linking capital is an integral feature of temporary migration, in particular seasonal workers' experiences.

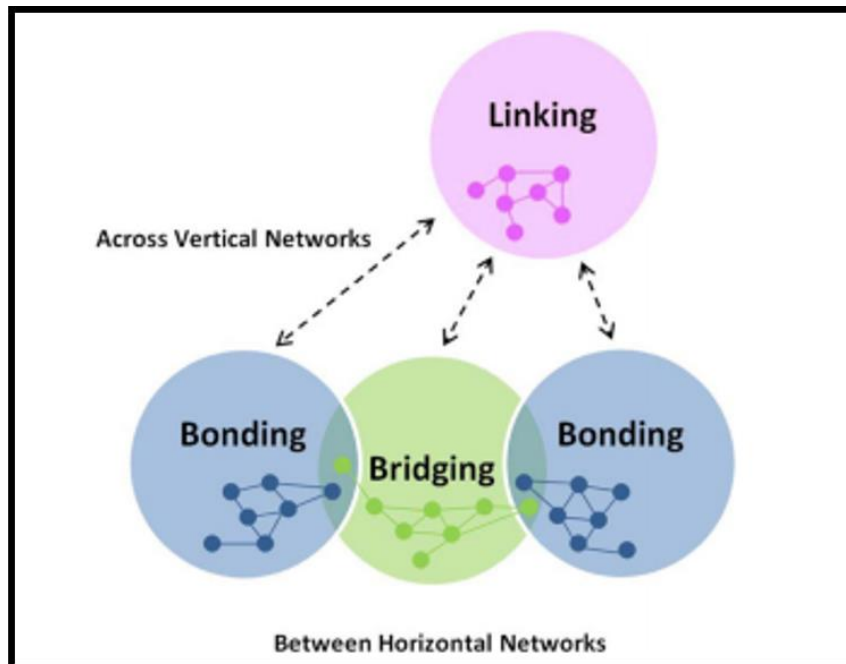
While research on the sociocultural dimension of temporary migrants and their sense of belonging is relatively limited, studies shed light on the importance of community engagement, social support can enhance the economic vitality of small towns, as well as the overall well-being and integration of temporal migrants in these areas. The theory of Social Capital may be an effective way to understand some of these socio-cultural dimensions of seasonal work.

### 3.3 Overview of Social Capital

The notion of social capital has been the subject of analysis and discourse among academics and scholars from a diverse array of disciplines. Robert Putnam's definition of social capital is most frequently referenced in academic literature. According to Putnam, social capital pertains to the characteristics of social organisation, including networks, norms, and social trust, that enable mutual benefit through coordination and cooperation (Putnam, 1993). Putnam's formulation emphasises the significance of social ties, as well as the norms and values that support them, in the creation of social capital. He contends that social capital is a collective resource that is generated and maintained via social interactions and connections, rather than the result of individual acts or attributes. (Bixler and Springer, 2018). Other researchers have proposed slightly different definitions of social capital. For example, Pierre Bourdieu defines social capital as "the sum of the resources, actual or virtual, that accrue to an individual or a group by virtue of possessing a durable network of more or less institutionalised relationships of mutual acquaintance and recognition" (Bourdieu, 1986, p. 248). Despite these definitional differences, most academics agree that social capital is a valuable resource that can contribute to a variety of social and economic outcomes, such as improved access to services and public amenities for a community.

In essence, social capital can be referred to as the networks, norms and values of a community that allow for the facilitation of social cohesion and collaboration within and between the community, business, and government bodies. Shier et al (2014) contends that social capital can be dissected into three main categories: bonding, bridging, and linking.

- Bonding capital refers to the connection within a group of individuals who share a similar identity.
- Bridging capital refers to the connection individuals have in the broader community.
- Linking capital is the value that comes from the connections with people or institutions that can provide access to resources and opportunities beyond the immediate network.



*Figure 3.1: Interactions across different types of social capital (Laycock and Mitchell, 2019)*

Laycock and Mitchell (2019) note that social capital's interaction with bonding, bridging, and linking can be described in terms of horizontal and vertical configurations. In a horizontal configuration, social connections occur at the same level of influence or authority within a group or community. In contrast, a vertical configuration involves social connections between groups or individuals with varying levels of power or authority. Comprehending the interplay among bonding, bridging, and linking social capital in both horizontal and vertical arrangements is crucial for proficient community establishment and social advancement. Through the identification of distinct forms of social capital and their corresponding impacts, policymakers and community leaders may encourage the opportunity of more beneficial and equitable outcomes for the community. To conclude, the notion of social capital is a valuable asset that holds noteworthy implications for diverse social and economic consequences. The

categorisation of social capital into three distinct types, namely bonding, bridging, and linking, serves as a useful framework for comprehending the dynamics of social networks and their interplay within and across diverse communities and institutions. The significance of power dynamics and authority in social connections is underscored by the horizontal and vertical arrangements of social capital interactions. Exploring the concept of social capital and its various manifestations can offer valuable perspectives on strategies for facilitating community advancement, enhancing resource availability, and encouraging social solidarity.

### 3.4 Social Capital in the Context of Temporary Migration

In the context of seasonal workers, Viitala and Kantola (2016), define social capital as the networks, relationships, and resources that seasonal workers have access to as a result of their social connections between themselves, as well as within the community or industry they work in (Viitala & Kantola, 2016). These connections and resources can provide both practical and emotional support for workers during their employment and create a sense of belonging for workers in an otherwise unknown place. Seasonal workers often face unique challenges, such as temporary and unstable employment, separation from family and home communities, unfamiliar environments, and limited access to social and economic resources (Kalter, 2017). The role of bonding, bridging, and linking capital can help explain why social capital is key to seasonal workers' experiences and creating a sense of belonging. This refers to interactions between workers themselves in terms of bonding capital, as well as bridging and linking capital in terms of interactions with and between the wider community, seasonal work industries, and providers of resources such as accommodation. These connections can support workers in terms of information and job opportunities, access to services, collective action and advocacy, as well as social connections that can assist with housing arrangements, transportation, and shared resources. These networks can also offer a support system during challenging times, provide advice, and help address practical needs (Viitala & Kantola, 2016). Developing and nurturing social capital among seasonal workers can be beneficial not only to individuals themselves, but also to the broader community and industry. For the short period of time, they are in the area, seasonal workers are part of the community, where a joint sense of community can create increased worker satisfaction and retention, and a more resilient and supportive work environment (Requena, 2003).

In respect to social capital, small towns can create both positive and challenging aspects regarding seasonal workers who temporarily migrate there. Challenges arise as a result of limited social networks and lack of support systems due to smaller populations. This can create a sense of isolation and loneliness for workers (Nazuri & Ahmad, 2019) As well as this, there can be a general lack of facilities and amenities to provide for seasonal influxes of people (Requena, 2003). A study undertaken by Wulff & Dharmalingam (2008) highlights that communities wishing to retain its seasonal influx of population need well-developed social support infrastructure including schools, religious activities, meeting places.

Moreover, when it comes to the discussion of responsibility for providing seasonal workers with essential resources such as transport and housing, bridging and linking capital may present complications. The provision of these resources is frequently the responsibility of employers or the government, raising concerns about the extent of their obligation and the potential for resulting tensions (Anderson, 2018). These discussions can spark debates regarding the allocation of costs, the calibre of provided resources, and the level of participation from various stakeholders.

On the other hand, bridging and linking capital can also be beneficial for seasonal workers in small towns. This is in regard to smaller rural towns where smaller populations can present tight knit and united communities, who provide support for seasonal workers, as well as having strong connections with each other (Besser, 2009). This demonstrates how social capital is crucial to seasonal worker experiences and creating a sense of belonging, which not only benefits the workers themselves, but also the communities they are integrated into. Wulff & Dharmalingam (2008) indicate that communities that wish to retain their seasonal population influx require a well-developed social support infrastructure that includes schools, religious activities, meeting places, and community networking. Communities can facilitate the integration of migrant workers by recognising and instituting a comprehensive social support infrastructure, which fosters a sense of belonging and promotes social cohesion among all inhabitants (Wulff & Dharmalingam, 2008). This holistic approach contributes not only to the well-being and quality of life of migrant workers, but also to the community's sustainable growth and inclusiveness as region.

In conclusion, social capital plays an important role in the experiences and sense of belonging of seasonal workers. Academic research emphasises that social capital comprises the networks,

relationships, and resources that seasonal employees can access through their social connections within their community or industry. These relationships provide both essential resources, social support, and foster a sense of belonging in unfamiliar environments. The concepts of bonding, bridging, and linking capital shed additional light on the significance of social connections among employees and with the greater community, industry, and resource providers. However, the context of small communities presents seasonal employees with both challenges and opportunities in terms of social capital. In general, cultivating social capital among seasonal employees is advantageous for both the individuals and the communities they join. Recognising and addressing the challenges and opportunities of social capital in the context of seasonal workers can result in enhanced experiences, improved community integration, and more equitable outcomes for all stakeholders. However, seasonal work comes with a range of challenges associated with the precarity of temporary employment. The following section will investigate further some of these challenges that have been identified in scholarship on temporary employment.

### 3.5 Precarious Employment

Precarity has been traditionally defined in terms of both employment and financial security, where the concept of 'precarious employment' has become a central concern in literature. Uncertainty of continual employment, adequate income, and the lack of rights and protection for workers have become three dominant themes identified across scholarship on seasonal work (Campbell & Price 2016; Kalleberg 2009; Boonstra, 2012). Although precarious employment has been seen traditionally as an economical concern, studies continue to reiterate its relationship to social capital and welfare, making it an interdisciplinary subject (Bayon, 2006). Bayon, 2006 highlights that increased levels of social exclusion and weakening of social capital can be a driving force for economic instability and vice versa. Factors such as seasonal variations, weather conditions, market demands, and the reliance on temporary or seasonal labour contribute to the volatility and precariousness of employment in these fields (Standing, 2014). The precariousness is pertained both socially and financially and has manifested in the discourse of safe and affordable housing for seasonal workers. This section of the literature review will further look at how social and economic precarity may be interconnected and the effect this has on seasonal employment.



Kallenberg et al. (2020) notes that the departure from the standard employment relationship to short-term or casual contract has a direct link to both job insecurity, lack of social networks, employee retention and an overall decline in well-being by those directly being affected, being both employers and employees. According to Kalleberg (2020), the effectiveness of social welfare programmes and labour market regulations enacted to lessen the impacts of insecure employment directly influences subjective well-being. In a general sense, subjective well-being refers to the ways in which individuals perceive and evaluate the quality of their lives. This is generally correlated to the livelihood of the individual and the social network developed both within their employment sphere as well as external connection (Weerakkody et al., 2020). Magnier-Watanabe et al., (2020) states that higher levels of subjective well-being and workplace contentment is a source of higher job performance and employee retention. It is this employee retention that may provide both the employer and employee with decreased social and economic uncertainty.

Sense of belonging and social integration are also considered key factors in the social dimensions of precarity. The concept of sense of belonging pertains to the individual's personal perception of being accepted, valued, and affiliated within a group, community, or location (Hagerty & Patusky, 1995). Experiencing a sense of belonging is a crucial aspect of human existence, as it affords others a sense of inclusion, support and social mobility. People may feel connected to others and their community when they have a sense of belonging. This can give them a sense of purpose and meaning, which can help to reduce stress and anxiety (Gallies & Paugam, 2003). Social integration can also assist individuals in gaining access to resources and support, which can be essential for overcoming precarity's challenges. There are a variety of ways to foster a sense of belonging and social integration among individuals experiencing precarity (Gallies & Paugam, 2003). These consist of:

- providing opportunities for social interaction, such as through community groups, religious organisations, and social events.
- Providing affordable housing and access to other essential services.
- Providing training and support to help individuals acquire the necessary skills to obtain excellent employment.
- Adopting policies that safeguard the rights of employees, such as paid medical leave and equitable remuneration (Maestas et al., 2007).

Across a number of datasets, Denmark and Germany display higher levels of subjective well-being, life satisfaction, and objective and perceived economic and job security; these levels are directly correlated with both nations' increased social welfare protections and more worker-friendly labour market policies (Kallenberg, 2020). Therefore, it can be assumed that linking and bridging capital have the ability to both decrease and increase social and economic dimensions of precarity. However, it should be noted there is no universal outcome that can be construed as external factors such as the spatial and cultural dimensions also have the ability to shape the precarity of an individual or group (Weerakkody et al., 2020).

### 3.6 Spatial Complexities of Precarity in Rural Locations

When addressing the spatial dimension of seasonal accommodation within the lens of precarity, studies have looked into the implications of onsite accommodation (Perry, 2018; Horgan & Liinamaa, 2017). On-site accommodation for workers may be beneficial for workers as they can get to work easily as there is no commute and socialising with workers is easy after work. However, this isolation has been known to limit the integration between workers and social centres. According to Kotulovski & Laleta (2021), seasonal workers are preferred due to their greater docility and the 'avoidance' of administrative and social security obligations. Due to the nature of this employee stereotype, substandard living conditions and greater social isolation have been constantly reiterated in studies (Perry, 2018; Horgan & Liinamaa, 2017).

A study conducted by Perry (2018) suggests that onsite accommodation has had a significant negative consequence for employer-employee relationships. Perry (2018) investigates the social integration of onsite accommodation within migrant farm workers from Mexico and Guatemala working in southern Ontario. This study explored how onsite accommodation limited workers in their capacity to build an "autonomous and dignified life" in Canada. Reports from workers explained that when an issue arose between the employer and themselves, employees felt little to no power to stand up for themselves as there was an underlying fear that themselves or their workmates would lose their accommodation or employment (Perry, 2018). When a worker did stand up for themselves, they faced backlash from their employer and co-workers for disrupting the accepted norms of workplace relations, thus provoking unrest in their domestic life. This situation demonstrates that onsite accommodation can intensify the power relations that pervade workers' lives where experiences at work are taken home. This may limit the employee's ability to become independent, because employer control can extend

beyond the workplace. It was also evident from this study that the lack of work-home life on the onsite accommodation for workers affected their sense of place and connection to the wider community, weakening the ability for social capital to be strengthened and extended to seasonal workers. One employee stated:

*“I am not in my house and you are not in yours. All of us are in a place that belongs to none of us”.* (Perry, 2018, p.1030)

A lack of connection to the wider community within onsite accommodation was also reiterated in a study by Horgan & Liinamaa (2017). The study discussed the effects of the Seasonal Agricultural Worker Program (SAWP) on the social lives of migrant workers in Canada. Migrant workers residing in ‘onsite’ accommodation significant spatially and temporal isolation from the surrounding communities in which they reside and work, leading to distinct separation from everyday social interactions. Some workers pointed out that there was little to no opportunities to socialise beyond their onsite accommodation due to the nature of their work which included long hours, the lack of freedom in transportation, as well as the rules and regulations around inviting people over or socialising past certain hours.

*“There are rules that you’re not supposed to stay out. There’s curfew after certain times at night, not supposed to be off the farm after ... can’t remember if it’s 10, between 9 and 10 ... must be on the farm. No visitors”* (Horgan & Liinamaa, 2017, p.721)

It is evident that on-site accommodation results in rules and regulations which affected the workers ability to develop a stronger to the connection with the area. Another quote from a worker highlighted that when workers did go into the centre of the area/town, the lack of time and transportation to go in meant that this interaction was only once a week and was just to gather food or access services.

*“The thing about shopping ... the farmer will give us only sometimes an hour, two hours on a Friday ... We’ll be scrambling to get what we got to get. In that time, if you want to go and buy groceries ... by the time you get in the bank, sometimes half an hour, 45 minutes before you get to a teller ... so many guys, so then when you get to town you only got an hour to shop. Not enough time”* (Horgan & Liinamaa, 2017, p.722)

This quote from a worker within the research undertaken by Perry (2018) demonstrates that workers lacked the opportunity to develop spontaneous or voluntary social relations with their wider community, and instead made informal and weak ties. The isolation away from town centres make them a place only to access services rather than use amenities and make social connections. This has an implication for the research on Seasonal Worker's accommodation in Central Otago, where the differences between on-site and off-site accommodation will need to be investigated further in this context.

### 3.7 Precarity and Physical Geographies

Precarity and physical geography can have a complicated and nuanced relationship. Physical geography refers to a geographic area's natural and physical qualities, such as landforms, climate, resources, and ecosystems (Arbogast, 2018). Precarity can be exacerbated by physical geography such as vulnerability to natural disasters, irregular weather patterns and climate change. Moreover, physical geographies can also directly affect the infrastructure and connectivity of a community. The development and accessibility of infrastructure, such as transportation networks, communication systems, and basic services, are influenced by physical topography (Woods, 2018). Regions with challenging terrain, such as mountainous landscape or inaccessible towns, may have inadequate infrastructure, making access to education, healthcare, employment opportunities, and social support networks more difficult (Alam et al., 2023). Precarity can be exacerbated by a lack of infrastructure, especially in marginalised groups such as temporal workers. Understanding the vulnerabilities brought on by physical geography can help develop strategies for enhancing resilience, creating suitable infrastructure, reducing the effects of climate change, and assisting marginalised groups, such as seasonal workers, to lessen precarity and promote sustainable development (Woods, 2018).

Central Otago's extreme weather predictions has resulted in an uncertain social, economic and environmental megatrend's (NIWA, 2019). Megatrends can be defined as "*large movements that become great forces in societal development as they define the present world and have potential to shape the future*" (McGregor, 2012). Previous research has established that temperature, weather patterns and water availability have been the three main concerns when it comes to the effects of climate change on horticulture (Clothier, Hall & Green, 2012; Thomas, Hayman & James, 2012).

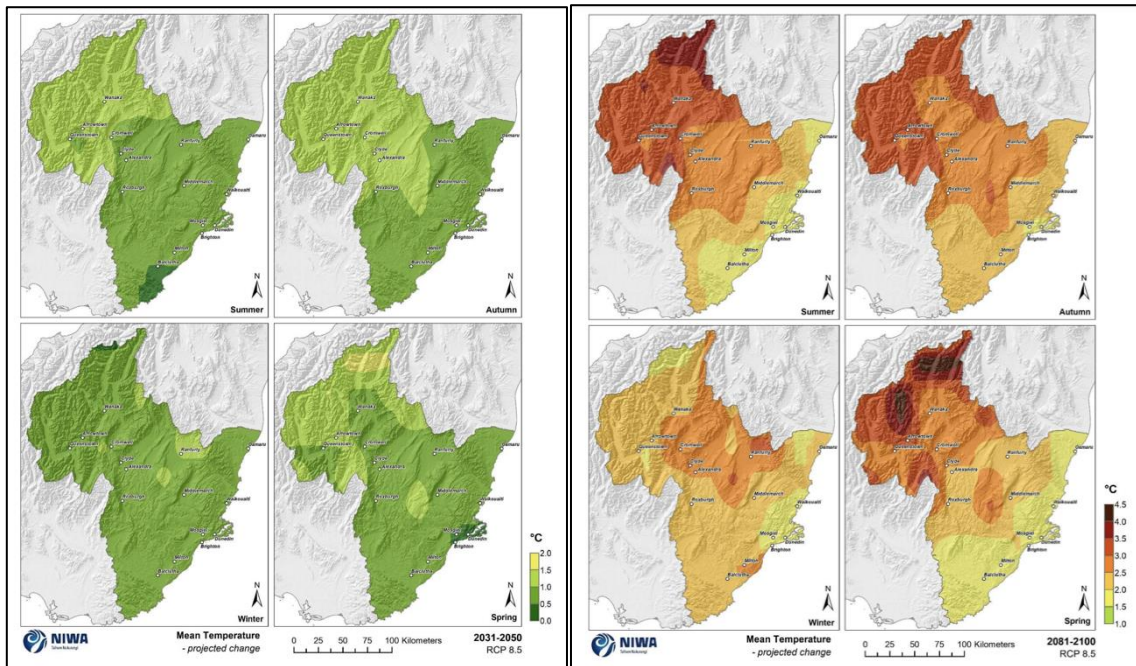


Figure 3.2: Seasonal mean temperature predictions for Otago, New Zealand for 2090 under RCP8.5 (left) and for 2040 under RCP4.5 (right) from NIWA, 2019.

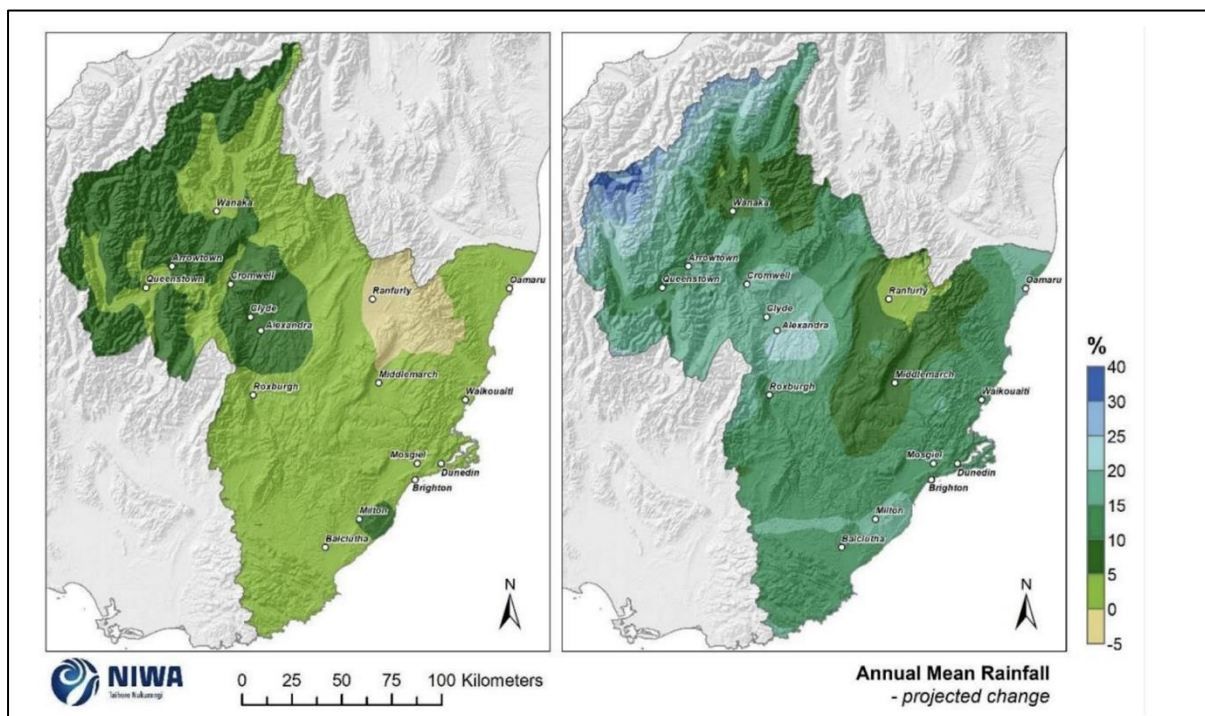


Figure 3.3: Seasonal mean temperature predictions for Otago, New Zealand for 2090 under RCP8.5 (left) and for 2040 under RCP4.5 (right) from NIWA, 2019.

As seasons within New Zealand and Central Otago are not always predictable and are expected to become further unpredictable, shifts in seasonal patterns are likely to result in economic insecurity and unpredictability for both seasonal workers and employers. Central Otago is the driest region of the country and is sheltered from rain-bearing systems arriving from the west and north (NIWA, 2019). Central Otago is known for its hot dry summers and cold dry winters which have resulted in a semi-arid ‘continental’ climate (NIWA, 2019). Climate change predictions demonstrate that these seasonal differences will become further extreme and persistent in the coming century (IPCC, NIWA, 2019). Extreme, rare rainfall events are likely to increase in intensity in Otago because a warmer atmosphere can hold more moisture (NIWA, 2019). Alexandra, Cromwell and Roxburgh all have a predicted 30% increase in a 100-year ARI 1-hour heavy rain event by 2090 (RCP8.5, NIWA, 2019).

Extreme events like these negatively affect fruits where Thomas, Hayman & James (2012) found that changes in temperature and weather patterns could result in insufficient chill accumulation, excessive heat accumulation, temperatures undesirable for effective pollination, heatwaves, frosts, insufficient irrigation, rain near harvest contributing to cracking and hail and wind damage. Cyclone Gabrielle, the severe tropical cyclone that devastated the North Island of New Zealand, resulted in a loss of more than \$1.4 billion loss in Hawke’s Bay horticulture industry (Morrison, 2023). This was a significant economic loss to growers, where a large proportion of growers did not have sufficient capital reserves or insurance settlements to meet the costs of recovery and be forced to exit the industry, having additional impacts on lost jobs for their employees (Morrison, 2023). This precarity is often passed onto seasonal employees, where casual contracts don’t guarantee certain hours of work and extreme weather events may see a reduction in weekly income for these workers.

### 3.8 Conclusion

As this research focuses on how to provide safe and affordable seasonal worker accommodation in Central Otago, this chapter has outlined the leading relevant concepts in relation to temporary migration and seasonal work in smaller rural towns, those alike to towns in Central Otago. Throughout this process, the key knowledge gaps within the field of temporary migration and seasonal work have been identified, with seasonal worker accommodation being a major absence in much of the literature found. This research conducted will therefore help to fill the literature gap regarding seasonal worker accommodation and

provide information on its importance in workers' overall experiences and wellbeing in the localities where they seasonally reside. Furthermore, this research will support the wide array of existing scholarship regarding temporary migration and seasonal work, through exploring connections between seasonal work, accommodation, and concepts such as social capital.

## Chapter 4: Methodology

In this chapter, we will explore the methodologies utilized to address the research objectives and questions. A mixed method approach was adopted, primarily focusing on qualitative methods. The collection of primary data involved conducting semi-structured interviews with key informants, including orchard owners, managers, and accommodation providers. Additionally, a survey was distributed to gather insights from both current and former seasonal employees. To gain a better understanding of the spatial aspects of seasonal accommodation, a desktop GIS mapping exercise was conducted. In terms of secondary data, relevant policy frameworks, planning instruments, literature, and media were reviewed.

This chapter will provide a comprehensive overview of the theoretical framework and research design. It will delve into the primary and secondary research methods employed, as well as engage in a discussion on the ethical considerations, positionality, and the overarching limitations of this research.

### 4.1 Theoretical Framework

The theoretical framework for this research adopted a mixed method approach, with an emphasis on qualitative methods. This approach combines qualitative and quantitative methods in order to strengthen the research. Qualitative data can provide a nuanced approach to complex social issues that takes into account the variety of ways that an issue can be understood by different people. In comparison, quantitative methods are better utilised for an “objective” issue, where variables can be measured, using numerical data (Cresswell, 2017).

This mixed-method approach utilised triangulation, which is an approach that combines multiple methods to achieve a more comprehensive understanding of a research topic. Its fundamental principle is that utilizing diverse approaches to a research question can enhance the reliability, validity, and overall quality of findings (Carter et al.). The use of triangulation in research offers several advantages. Firstly, it enhances the credibility and validity of findings by minimizing reliance on a single data source or interpretation. Secondly, it enables a nuanced comprehension of complex phenomena by capturing different dimensions and aspects (Cresswell, 2017).



In triangulation research, the goal is to collect and compare data obtained through different means. This research utilised triangulation through several data collection methods including interviews, a survey, policy analysis, media analysis and a literature review to gather a broad range of information. By drawing data from multiple sources, this research aimed to garner a comprehensive understanding of Seasonal Workers accommodation in Central Otago that would not have been achieved using just a single method.

Both Social Constructivism and post Structuralism have been central components to this theoretical framework and in particular, the use of qualitative methods. In research guided by a social constructivist framework, the focus is on valuing and incorporating the perspectives of the participants being studied. Researchers ask open-ended questions, which allows participants to shape and construct the meaning of the situation. Constructivist researchers pay attention to the dynamics of interaction among individuals and consider the specific environments in which people live and work, aiming to understand the historical and cultural influences on the participants (Cresswell, 2017). The meanings individuals assign to their experiences are thus seen as not predetermined but are shaped through social, historical and cultural factors. This allows for a broad understanding of an issue from key actors, in aims of not generalising the issue at hand. Similarly, Post-structuralism denies the concept of objective knowledge and emphasises that interpretations are shaped by subjective knowledge, as opposed to asserting any objective truth (Darkins, 2017). This means a diverse range of meanings and interpretations can inform a multi-faceted analysis that takes into account the complexity of social issues. Consistent patterns and perceptions were identified between primary and secondary findings indicates a reliable and consistent understanding of the topic. Further, the inclusion of a literature review, policy content analysis, and media discourse added depth and context to the primary case study in central Otago.

## 4.2 Primary Methods

### 4.2.1 Key Informant Interviews

Semi-structured interviews were undertaken with a range of stakeholders, using a pre-prepared set of open-ended questions (See Appendix X). Key informants were selected based on their involvement with the horticultural and viticultural industries in Central Otago. Interviews were undertaken between the 1<sup>st</sup> and 6<sup>th</sup> of May 2023 at a range of locations across Central Otago,

as detailed below. Each interview had two group members present. One person asked questions while the other took notes, allowing for the conversation to flow with increased ease. Before the interviews, participants were required to sign a consent form, allowing the interviewer to record the conversation and use the findings in the research, and they could also choose whether they would like to remain anonymous. The form included a project outline with the goals and objectives, ensuring participants understood their role in the research. Each interview was transcribed and coded by key themes to analyse the data and identifying any patterns that emerged across informant interviews.

To identify which key stakeholders would be contacted, the researchers compiled a list of both small, medium, and large sized operational horticultural orchards near three key locations: Cromwell, Alexandra/Clyde and Roxburgh. These orchards were contacted via email if they would be willing to participate in a semi-structured interview. From this process, six orchard owners or operators who had experience in managing seasonal staff were selected to take part in a semi-structured interview, face-to-face on their orchard. This provided the opportunity to undertake on site visits to some of the on-site accommodation provided and add context to the interview content.

Three accommodation providers were contacted and subsequently interviewed, to gain an understanding of some of the issues these informants raised with providing accommodation to seasonal workers. Following interviews with orchard owners and operator, several campgrounds were highlighted as popular sites for seasonal workers to stay at, however, upon contacting these campgrounds it became apparent that they had shut down and were not readily contactable. To supplement these key informants, and provide a range of expertise on the topic, the researchers contacted the Central Otago Winegrowers Association and undertook a face-to-face interview in Cromwell. This provided an overview on the unique challenges and differences that the viticulture industry faces in comparison to horticulture.

By accepting the deconstruction of subjectivity, scrutinising power relations and discursive practises, recognising the dialogical character of knowledge, and participating in reflexivity and positionality, semi-structured interviews have adopted a post-structuralist viewpoint. This method provides for a more nuanced understanding of the dynamic and changeable nature of social reality and knowledge generation. A full list of key informants can be found in Appendix P.

### **4.2.2 Survey**

The survey was built on Survey 123. This an ESRI product, used for data gathering software that can be used to create and analyse surveys (ESRI, 2023). The target audience for the survey were currently seasonal workers or had been in the previous 2 years of completing the survey. 23 questions were designed to understand some of the biggest accommodation issues seasonal workers faced when finding accommodation, as well as their accommodation preferences. The survey was distributed on Facebook pages and local community boards (libraries, and physical noticeboards). A full list of locations where the survey was advertised can be found in Appendix T. Additionally, key informants were provided with a web link to share with their staff.

In this research, the survey method has been utilised in a social constructivist manner, departing from its traditional quantitative nature. Instead, the survey questions are formulated and responded to qualitatively, in accordance with the principles of social constructivism. The purpose of the survey is not to conduct a statistically robust analysis of the topic, but rather to collect data that will be interpreted and analysed through a post structural lens. This interpretation approach is not concerned with establishing objective truths, but rather with comprehending subjectively justified knowledge. The focus is on aggregating a wide range of perspectives to gain insights into the research topic.

## **4.3 Secondary Methods**

### **4.3.1 Literature Review**

The purpose of this literature review is to provide a comprehensive and critical summary of existing published research and scholarly works on the wider themes that this research pertains to including temporary migration, precarious employment, socio-spatial implications of temporary/relocatable accommodation as well as the climatic precarity of horticultural industries. The literature review has guided this research by identifying key issues and providing a high-level contextual understanding of some of the challenges that are integral to seasonal workers accommodation. This review process has additionally supported the identification of certain gaps and limitations, including the lack of literature relating directly to the unique challenges that the Central Otago horticultural industry faces in terms of the lack of

affordable accommodation coupled with a strong tourism industry that strains the supply of housing. Further, the literature review has aided in the development of the questionnaire survey and questions for informant interviews to ensure some of these gaps are addressed in the primary data.

#### **4.3.2 Media Discourse**

This study, which is situated within the domain of popular media, employs Foucauldian discourse analysis. Foucauldian discourse is a type of discourse analysis that concentrates on power relations within society as communicated through language and conduct and is founded on Michel Foucault's theoretical foundations (Power, 2007). Consequently, the primary objective of this study was to examine the power dynamics depicted in the popular media surrounding the discussion on secure and affordable housing for seasonal workers in Central Otago, while also considering its broader national context.

The media discourse analysis used a systematic sampling technique for data collection. Data collection consisted of a range of media articles via Factiva (university provided archival tool) and had a specific research criterion; specifically, key words such as "seasonal workers," "RSE workers," "affordable and available housing," "Central Otago," "Marlborough," "Hastings," "Hawkes Bay", "Accommodation" and "Queenstown" was utilised. Once key words were applied, Factiva formulated an array of diverse articles that collected from local and regional online newspaper outlets within New Zealand. Fifty sample articles were then drawn based on their relevance to the research topic and their publication within a specific period, e.g., the past three years, to ensure the currency of the discourse was the most recent. The sample group was further reduced by a predetermined pattern of the article's appearance on Factiva. This method aims to introduce an element of random selection while still ensuring a systematic and representative of sampling of articles. However, it is important to consider the limitations of this method. Considering our own positionally as the sampling curator and the data collection medium (Factiva). Both contain inherit bias and there it should be acknowledged the findings drawn from this study may not necessarily be fair representation of sample population (Smith, 1983).

The selected articles have been subjected to a Foucauldian discourse, which involves identifying patterns and themes in the language and representation of power dynamics,

knowledge construction, historical context, subjectivities, and agency (Hook, 2001). The analysis examines the use of language, quotes, sources, and other discursive strategies employed in the articles to construct and reinforce the media narrative that shapes safe and affordable housing for seasonal workers in the sample regions. While media discourse can reflect and shape public opinion, it is important to note that media representation may not always accurately reflect the diversity of public perspectives (Saraisky, 2016). To obtain a fair representation of the sample population, secondary commentary such as Facebook, Twitter, and YouTube comments corresponding to these articles have also been considered additional mediums for these articles. As digital comments are a common form of public engagement with news articles, the study may also include an analysis of the comments related to the selected articles. This will involve identifying patterns and themes in the comments, including the voices and perspectives expressed, the use of language, and the ways in which power dynamics, knowledge, historical context, subjectivities, and agency are reflected in the comments.

#### **4.3.3 Policy Review**

To address what policy changes could enable more seasonal workers accommodation in Central Otago, a thorough review was undertaken of national, regional and district level plans, policies and strategies pertaining to the topic. This provided an in-depth understanding of how planning frameworks influenced the form and location of seasonal workers accommodation in Central Otago. Additionally, a comparative policy analysis was undertaken between the Central Otago District Plan and other key horticultural areas relevant district plans including: The Tasman Resource Management Plan, Central Hawkes Bay District Plan, Far North District Plan, Marlborough District Plan and the Hastings District Plan. This supported the policy recommendations which were informed by the findings in this comparative analysis.

#### **4.3.4 GIS Mapping exercise**

A Geographic Information Analysis (GIS) analysis was undertaken to illustrate Central Otago's building areas, resource areas and orchard areas. These three categories were obtained through a range of sources that were imported into ArcGIS Pro as polygons. These three polygons were used to identify land-use patterns across three key areas: Cromwell, Alexandra and Roxburgh. Building areas were used to identify different areas of spatial density and

arrangement of buildings. A GIS layer named 'NZ Building Outlines' was sourced from the LINZ data service. Polygons available in this layer provided the most recent set of residential building outlines in New Zealand, last updated on the 5<sup>th</sup> of July 2023 (LINZ, 2023). Data on the location of the Resource Areas for Cromwell, Alexandra and Roxburgh was taken from the CODC District Plan data portal. These were imported into ArcGIS Pro as polygons. Orchard areas were also identified across the key areas of research. These polygons represent New Zealand orchards from 2018 which also include vineyards. This was taken from the New Zealand's Land Cover Data Base (LCDB).

## 4.4 Social Positionality, Ethics and Limitations

### 4.4.1 Positionality

Positionality in research refers to acknowledging the researcher's subjective perspective and biases, which can influence the research process and outcomes (Whitaker, 2021). Researchers are not neutral observers but active participants whose backgrounds and experiences shape their approach to the research. Whitaker describes positionality in research as the understanding that the researcher has the power to define the nature of the research, and consequently exclude aspects of the research from scrutiny. It is for this reason that acknowledging the positionality of the researcher may aid in fostering a reflexive approach to the study.

### 4.4.2 Ethics

Ethics approval for this research was obtained from the University of Otago Human Ethics Committee following an Ethics B application (see appendix X). Ethics B is required for low-risk research with human research participants. This application detailed the methods of the research, as well as how participants were to be recruited and how audio-visual material would be secured. This application also outlined what participants would be asked to do, and how their consent to participate would be recorded. A set of preliminary questions that would guide the interviews with key informants was also submitted as part of this application, with a list of survey questions that would be utilised following this. The consent form that key informants would have to sign prior to their interview was also reviewed as part of this application.

Interviews were undertaken under the New Zealand Planning Institute's Code of Ethics and the University of Otago Code of Student Conduct. Researchers ensured to the best of their

ability they would reflect on their positionality and potential bias prior to any interviews undertaken. Further, interviewees were given a full list of their rights prior to the interview including the right to remain anonymous and right to withdraw from the research during and post-interview.

#### **4.4.3 Limitations**

Within the research process, several limitations became apparent. First, the research field week was undertaken in May. This meant that there was a lack of seasonal workers working and living in Central Otago at this time, as the peak period for the requirement of horticultural workers in this district is between December and February. This presented a major risk for the research, where most key informants were orchard owners and operators and therefore potentially skewed the results towards the preferences of business owners rather than workers themselves. Although researchers requested that they were put in touch with employees of key informants who were interviewed, it proved too difficult because a) Many employers did not have seasonal staff at that time aside from RSE workers and b) Orchard owners and operators may have been apprehensive about their staff expressing views that deviated from their own. This has resulted in a limited representation of perspectives on the issue of seasonal workers accommodation.

The researchers had expected some barriers in communicating first-hand with workers, especially as during the literature review process it became apparent that some seasonal workers who are in a precarious position may not want to speak out about their experience, because of the fear that there could be repercussions effecting their employment (cite lit review). For this reason, an online survey was used to triangulate the research, and to target workers who may not be residing in Central Otago anymore. However, the response rate was low, even with the survey being distributed and advertised across the district on local noticeboards. - further explain this. A small sample size of 50 people meant that the results were not an accurate representation of the diverse accommodation needs and preferences of seasonal workers.

Another key limitation was that a high proportion of survey respondents were students. Students at the University of Otago may have more connections with family and friends in Central Otago, and therefore their accommodation needs may be distinctly different from other workers who have travelled from other countries without a support network in place. This

means the survey does not fully represent the broad range of people who travel to Central Otago for seasonal employment. Further information regarding this aspect can be found in section x: policy results. The primary case study in central Otago also has limitations in terms of generalizing the findings to other regions or contexts, potentially limiting the broader applicability of the study.

## 4.5 Conclusion

This chapter outlines the mixed method approach used for data collection, primarily focusing on qualitative methods. This research utilised semi-structured interviews with key informants and distributed surveys to seasonal employees. Secondary data included policy analysis, literature review, and media discourse. The theoretical framework encompassed social constructivism and post-structuralism and triangulation was employed for data validation. Ethical considerations were addressed, and limitations were acknowledged. This methodology provides a strong foundation for understanding seasonal workers' accommodation in Central Otago.



## Chapter 5: Media Discourse Analysis

### 5.1 Analysis of the Media

This following section offers an in-depth discussion of the findings from the media discourse analysis. The purpose of this media discourse analysis is to investigate the diverse perspectives present in the media dialogue of seasonal workers accommodation in four primary localities. These locations included, Central Otago, Marlborough, Hastings within Hawkes Bay, and Queenstown. Comprehending the viewpoints of diverse stakeholders is imperative in effectively tackling the intricate matter of seasonal worker accommodation. The stakeholders involved in this context comprise of labourers, employers of the horticultural industry, policymakers, neighbouring communities, and organisations advocating for specific causes. Each cohort possesses a distinct collection of interests, concerns and priorities that influence their perspectives regarding this issue.

The comprehensive scope of 'the media' encompasses various forms of communication including television, radio, newspapers, magazines, the Internet, social media platforms. These channels serve a crucial function in disseminating information to the public, as noted by Sanson et al. (2000). Arguably, the media within of itself is a crucial social institution. According to Bell (1995); media entities play a pivotal role in the circulation of cultural, political, and societal norms, both influencing and illustrating the development and articulation of these constructs. Hence, an evaluation of the discourse relevant to seasonal worker accommodation provides a more evidential understanding of power discursive and tensions between individuals, organisations, and governmental bodies.

The purpose of this study was to investigate the representation of different groups within the media and examine the mechanisms through which power operates via language and actions expressed in the media articles. The historical context of these articles is also considered, exploring how past policies and power relations have shaped the media discourse on accommodation for seasonal workers in the four primary locations. The Foucauldian framework employed in this study helps to examine power relations, knowledge production, ideologies, resistance, and agency (Power, 2007). By adopting a Foucauldian perspective, the study aims to uncover the underlying power dynamics and mechanisms that shape the living

conditions and experiences of seasonal workers and the interplay of perspectives between key stakeholders.

An assessment of themes and significant excerpts from articles and secondary commentary will be displayed in a table. Findings and conclusions drawn from this analysis will aid in a triangulation effect in the broader research exploration of this project.

Aspects of analysis - based on the Foucauldian discourse was broadly adopted as themes.

<i>Aspect of Analysis</i>	<i>Description</i>
<i>Power Relations</i>	Examination of how power is exercised over seasonal workers' accommodations through policies, regulations, and practices.
<i>Knowledge Production</i>	Analysis of the types of knowledge produced, sources of authority, and use of knowledge in legitimising or challenging power relations
<i>Ideologies, Perceptions, Status quo</i>	Identification of dominant ideologies and social norms embedded in the discourse related to seasonal workers' accommodation
<i>Resistance and Agency</i>	Exploration of how seasonal workers and other actors resist or challenge the dominant discourse and exercise agency in shaping their living conditions
<i>Effects and Consequences</i>	Examination of the impacts of discourse on seasonal workers' living conditions, well-being, social integration, and wider social, economic, and political dynamics.

*Table 5.1: Framework for Media Discourse Analysis*

## 5.2 Context and Circumstances

As previously discussed, this media discourse has utilised a sample of media from four primary regions, namely Hastings/Hawkes Bay, Marlborough, Central Otago, and Queenstown. (However, there are a few other notable articles from other regions.) These primary regions were chosen based on their notable seasonal labour force and their significance to the viticultural and horticultural sectors of New Zealand (Gibson & McKenzie, 2014). As a result, the bulk of the articles in the pooled sample will relate to these places; nonetheless, the patterns discovered within these selected regions are regarded as a largely universal experience across New Zealand (Gibson & McKenzie, 2014). The Hastings/Hawkes Bay region, situated on the eastern coast of the North Island, is renowned for its vast orchards and vineyards. The area hosts a significant workforce of employees engaged in RSE employment particularly in the labour of fruit harvesting and packaging (Rockwell, 2015). Marlborough, situated in the northernmost part of the South Island, has a renowned economy in the viticulture industry. Queenstown, a renowned tourist spot situated in the southern region of the South Island, is a favoured destination among tourists and serves as a significant employer of seasonal workers in the hospitality sector and retail sector (Cameron, 2011). Central Otago, situated in the southern region of the South Island, is a notable area with a substantial population of seasonal worker and is the locality at the forefront of this research. All these location present intense patterns of population change through the year, resulting in an ambiguous housing market in which the demand for short-term housing fluctuates drastically.

The supply and demand for seasonal worker accommodation is a crucial consideration when addressing the needs of workers and the horticultural industry as a whole. Supply refers to the availability and quantity of housing options for seasonal workers, while demand relates to the number of workers seeking housing during their employment period (Parrilla et al., 2007). Balancing supply and demand are essential to ensure workers have access to safe and affordable housing. The most active periods of seasonal labour for horticulture and viticulture often co-insides with summer tourists' peak seasons and this results in intense patterns of transit populations (Parrilla et al., 2007). Seasonal worker communities have the greatest population in the sample regions between the months November and April. With employment peaks being in December and March (Timmins, 2009). This is consistent with summer tourism peak seasons that fall between the months of December and February (Wilson & Becken, 2011).

This results in rapid decrease in population of these regions once peak season ceases. These externalities have direct implications on the access of safe and affordable housing in these regions. The lack of consistency in population year-round incentivises a limit to public amenities and infrastructure and the potential for an area to effectively supply this inconsistent yet intense demand for temporal housing and accommodation.

In recent years, COVID-19 has had a sizable impact on the seasonal worker patterns and the economies on both a macro and micro level. The COVID-19 pandemic has resulted in limitations on travel and the closure of borders, thereby causing a dearth of labour in sectors that are heavily reliant on migrant employees (Bailey & Bedford, 2022). Similarly, other natural calamities, like Cyclone Gabrielle in January 2023, exposed the disproportionate vulnerability to the health and well-being of RSE workers. The contexts and circumstances discussed will be considered when undertaking the media discourse analysis and the research exploration in general.

The discourse surrounding safe and affordable housing for seasonal workers is a loaded discussion, although similar patterns of experience have been witnessed in the media between the different regions. It should be noted that there are varying experiences for different types of seasonal workers, communities, and places of employment. It is essential to consider the unique characteristics and requirements of various categories of seasonal workers. In the context of this study, other categories include local seasonal workers and migrant seasonal workers. Local seasonal workers are citizens or residents of the country where the work takes place. They are authorised to operate in the country without the need for additional permits or visas (Timmins, 2009). Local seasonal employees are already in the country and readily available for seasonal employment. They could be students, retirees, or people looking for temporal employment. Migrant seasonal workers include backpackers and travellers with holiday or work visas, they may engage in seasonal labour. However, RSE employees are considered the most fundamentally distinct because their housing, employment, and visa status are all directly related to a single employer, and they too are migrant workers from outside of the country (Cameron, 2011). As a result of these factors, the experiences of RSE workers may differ from those of other seasonal workers most distinctly.

## 5.3 Key Findings

The section that follows provides an insightful analysis of media articles regarding safe and affordable housing for seasonal employees in the horticulture and viticulture industries. This discussion is structured according to the Foucauldian discourse's five important aspects of analysis (*table 5.1*). The purpose of the analysis is to provide a critical insight into the power dynamics, knowledge production, subjectification, resistance, and implications within these discourses. It will conclude by emphasising the need for comprehensive policy changes and heightened public awareness to address the accommodation challenges seasonal workers confront.

### 5.3.1 Power Relations and the Status Quo

The media discourses regarding safe and affordable accommodation for seasonal workers reflect distinct power dynamics. Various stakeholders, including employers, government authorities, industry representatives, and advocacy groups, influence these discourses. Power disparities are evident in the manners in which these actors frame the issue, control the narrative, and shape public perception. A general theme found between all seasonal worker types was the power imbalance between the worker and employer or the worker and local authorities. For the case of RSE workers, it was well documented in multiple articles of the narratives of employers asserting control over the autonomy of their employees (Fonseka, 2022; Johnston, 2022).

In a visual/ audio interview in Hawkes Bay for the fruit harvest, a reporter summed up their perspective in the following; “it seems that the scheme allows for what can only be described as debt bondage, where salary deductions are being used as a means to financially control workers and they attempt to remove agency from them” (Pang, 2023). A written article that shares a similar perception of the scheme refers to the RSE scheme as “modern day slavery”. These examples highlight the power dynamics at play in the employment relationship, where employers have significant control over their employees' working conditions and livelihoods. The use of this term draws attention to the way in which workers are exploited and their labour is devalued, positioning employers as the dominant actors in the relationship.

For other types of seasonal workers, a similar display of dominant actors is seen between the worker and local authorities. One article notes seasonal workers who have been unable to

obtain temporal accommodation are being face with local authorities monitoring and reinforcement power (Lueck, 2023). Central government and local authorities have responded to the resentment of backpackers overpopulating ‘freedom camping’ designated areas of Napier and Queenstown. The article notes that the Parliamentary Commissioner for the environment has issued a series of stricter regulations of self-contained vehicles only, a definitive time of occupying and for local governments to ensure freedom camping penalties are obeyed (Lueck, 2023). However, this ‘power’ is reluctant to have any positive implication. Rather, it is local authorities actioning fruitless authority, instead of acknowledging this informal housing in campsites is a direct consequence of the accommodation shortages.

These dominant actors of employers and local authorities together hold bureaucratic tendencies and have duopoly over seasonal workers. However, when presented with the opportunity to collaborate to improve the living conditions for seasonal workers a positive relationship will not always form (Brown, 2023; Jones, 2019). In 2023; local council, the Central Otago Affordable Housing trust and the Cromwell Community Board met to discuss long-term solutions for accommodating seasonal workers. According to its chairman, Glen Christiansen of the Central Otago Affordable Housing Trust notes within its own organisation, they face significant structural and management problems. Christiansen notes many of its board members have decided to resign. This decision was made after the Central Otago District Council rejected a proposal to donate ratepayer-owned land worth \$16 million to the trust (Brown, 2023). The rejection has led to divergent opinions among important local authorities, such as the councillors and Cromwell Community Board. Instead of endorsing the trust and community board, several council members suggested that the Cromwell Community Board investigate alternative housing solutions. Another Councillor referred to the Central Otago Affordable Housing Trust as a “sitting duck” (Brown, 2023). This situation exemplifies the inability of these organisations to collaborate effectively and provide meaningful contribution to those vulnerable in the community.

In summary this examination explores power dynamics surrounding seasonal workers' accommodations are influenced by different stakeholders. Employers and local authorities have control over workers' living conditions and employment relationships. Media focuses on power imbalances where employers have control over workers' lives and finances. The RSE scheme is being compared to modern-day slavery and is raising concerns about exploitation.

Local authorities regulate seasonal workers but do not solve the issue of accommodation shortage. Collaboration opportunities are hindered by bureaucratic tendencies of dominant actors, resulting in ineffective teamwork. Overall highlighting the difficulty in enhancing the living standards of seasonal labourers and the ongoing reinforcement of bureaucratic power divisions as the status quo.

### **5.3.2 Knowledge production and sources of authority**

The type of knowledge produced, and the authorities of this knowledge have the opportunity to either legitimise or challenge the status quo surrounding safe and affordable housing for seasonal workers. These actions have flow on effect to the working conditions, wellbeing, and vulnerability of seasonal workers. For all types of seasonal workers one knowledge that is constantly reproduced is precarity and vulnerability that comes with short-term housing (Jameison, 2023; Otago Daily Times, 2023b).

The media discourse presented a variety example of employers legitimising this knowledge production. One noteworthy example was during a face-to-face interview with RSE horticultural workers at their accommodation. The focus was on their health and well-being. Following COVID, the employees reported that they were living in deplorable circumstances, with six men jammed into a room, whilst paying \$150 per week, and a constant exposure to cold and wet conditions that resulted in repeated illness (Johnston, 2022). The article further details that these workers were refused paid sick leave, and their employer dismissed illness as unnecessary unless hospitalisation was required. One worker identifying only as "Matthew," voiced fear of penalties for disclosing such information (Johnston, 2022). Workers are reluctant to freely express their thoughts demonstrates the employer's capacity to force and penalise dissident employee. These circumstances form a narrative of employer contempt for the employee and control of employee autonomy.

Some accommodation providers and landlords built a similar narrative of legitimising the precarity and vulnerability of seasonal employees' housing. According to one article, the scarcity of worker housing in post-COVID Queenstown has posed issues for the tourist and hospitality industries (Jamieson, 2023). Over 20 occupants of downtown Queenstown flats have been sent with eviction warnings as their units are being transformed into short-term Airbnb rentals (Jamieson, 2023). This practise of transforming residential apartments into

tourist accommodations contributes to market saturation, putting further strain on an already scarce supply of affordable short-term housing. Another article notes that the tourist industry adds an additional layer of complexity by adding to the demand for short-term housing township (Roxburgh, 2023). Moreover, this has a flow on effect to local businesses who are unable to acquire retail and hospitality staff. The implication also reaches to long-term residents who have been forced to move to the outer skirts of the township (Roxburgh, 2023). In short, there is clear evidence this legitimising power reaches further than the immediate scope of seasonal worker accommodation.

However, there has been some challenging of this distinct power and the authorities that impose these relations, particular during unprecedented times. In response to both Cyclone Gabrielle and the COVID pandemic, a shift in perspective and action of authority powers was exhibited. One such instance was seen in the response to Cyclone Gabrielle in Hawke's Bay (Bedford, 2023). The cyclone caused extensive damage to orchards and worker accommodations, displacing around 800 RSE workers. However, in a shift of perspective and action, the local community and government rallied to support the RSE workers in their recovery efforts. These workers played a vital role in the region's rebuild, with full-time employment offered either in a different area or by assisting Hawke's Bay orchards with the upcoming harvest (Bedford, 2023). This collaboration demonstrated the importance of social capital and the bonding and bridging networks between the community and authorities in rebuilding after a natural disaster.

Another illustration of this change in distinct power relations was shown by developers in reaction to a slow commercial phase during COVID 19. A Katikati orchard firm is collaborating with developers on a \$5 million onsite orchard accommodation and the initiative intends to house 140 people (Rice, 2022). This unique project entails replacing the current facilities with a modernised structure that includes lounges and WIFI, satisfying the demands of both employers and employees. It has been mentioned that the facility will be utilised for different kinds of short-term accommodation in the region during off-seasons (Rice, 2022). In conclusion, this type of stakeholder engagement may help to effectively address the region's temporary housing need by providing purpose-built accommodation that also has a multi-purpose function.

In conclusion knowledge production and the authority reinforcing that knowledge have a crucial role in either sustaining or changing the existing quo regarding safe and affordable



housing for seasonal workers. The media discourse presents instances of employers legitimising employees' problematic living arrangements. This illustrates the power imbalance and influence that companies have over their employees. The consequence is that the housing crisis will worsen, and seasonal employees will be more vulnerable. However, there have been examples of this power dynamic being challenged at unprecedented times. These instances show a change in perception and action towards resolving power inequalities and improving seasonal workers' living conditions.

### **5.3.3 Resistance and Agency**

This media discourse has shown that seasonal workers often resist or challenge the dominant discourse surrounding the workers living conditions alone, however, when collective action or partnership is exhibited then agency may present itself. One form of resistance is collective action and organizing has been portrayed in the media. Seasonal workers may work together or with advocacy media outlets to amplify their voices and advocate for improved living conditions. By uniting, they challenge the dominant power structures and negotiate for better wages, safer accommodations, and improved working conditions. This discourse has been shown during a face-to-face interview in which RSE workers exercised agency by speaking out and sharing their experiences with the public. By making their voices heard, they challenge the dominant discourse and bring attention to the injustices they face (Johnston, 2022). However, this agency was still met with resistance, in which many workers were reluctant to share their images of their face or use their given name in fear of negative backlash from their employers.

A similar narrative was also noted in cases where employers exerted excessive control over employees' lives. One article noted that some employers were banning the consumption of kava or coercing a worker into providing a negative pregnancy test (Fonseka, 2022). These examples highlight the theme of employer control and its impact on individual autonomy and self-determination. The current configuration of the RSE program raises concerns regarding potential infringements upon fundamental rights; including equality, fair labour conditions, decent living standards, freedom of movement, privacy and health (Fonseka, 2022). Addressing these issues is crucial to fostering a system that respects and protects the rights of RSE workers and challenge the status quo.

However, local authorities in some regions have attempted to challenge the dominant discourse. The Hastings District Council's strategy planning and partnerships committee recently accepted a proposed district plan modification targeted at enabling RSE worker accommodation. Stakeholders have indicated a desire for modest self-catering villages in proximity to where there are high RSE employment rates (Hastings District Council, 2020). Currently, the planned district plan makes no mention of seasonal migrant housing, except in the plains production zone, where a maximum gross floor space of 125m<sup>2</sup> is permitted. The proposed plan change intends to give more flexibility for the development of accommodation facilities or the reuse of existing buildings to satisfy the demands of seasonal employees (Hastings District Council, 2020). This effort attempts to integrate the transit population into mainstream society and offer chances for social cohesion with the larger community by legitimising seasonal workers' occupancy in residential zones.

The media coverage highlighted the resistance to agency that RSE workers and their employers faced. Individual acts of resistance were unlikely to occur, but group action and collaboration were more largely exhibited. RSE workers have used collective bargaining and activism to raise their voices and lobby for better working conditions (Johnston, 2022; Fonseca, 2022). Employees' unwillingness to reveal their names for fear of employer retaliation, however, indicates that their agency encounters opposition frequently. On a more positive note, some local governments, such as Hastings District Council, have made attempts to disrupt the mainstream rhetoric by proposing changes that allow RSE workers to immerse themselves in the local community, fostering social inclusion and cohesiveness.

## 5.4 Conclusion

These discourses reveal a distinct imbalance of power between employers and employees, with employers exerting control over their workers' lives and working conditions. The media portrays the exploitation and vulnerability of seasonal workers, especially in the case of the RSE scheme, in which employers exert a great deal of control and limit workers' agency. Production of knowledge and sources of authority play a crucial role in the formation of discourse. Employers and housing providers frequently legitimise the precarious living conditions of seasonal workers, thereby reinforcing the status quo and perpetuating power imbalances. However, there are instances in which authority figures and sources challenge

these power dynamics, such as the community and government's response to Cyclone Gabrielle, in which they rallied to support and collaborate with RSE employees.

Collective action and organising highlight the resistance and agency of seasonal workers. Workers collaborate with advocacy media to amplify their voices and advocate for improved working conditions. However, their agency frequently encounters resistance and employees then fear retaliation from their employers if they do choose to challenge the status quo. Instance of excessive employer control, such as the prohibition of kava consumption or the coercion of employees, emphasise the need to address individual autonomy and self-determination of seasonal workers. Local authorities' efforts to challenge the hegemonic discourse, such as the Hastings District Council's proposed district plan modification, are encouraging measures towards integrating seasonal employees into local community. These examples show that alternative action can promote social cohesion and provide opportunities for seasonal employees to enjoy higher living standards.

To address the housing issues encountered by seasonal employees, comprehensive policy modifications are required, and stakeholder collaboration is crucial. This requires recognising and addressing imbalances of power, protecting workers' rights, and fostering fair labour conditions, respectable living standards, and freedom of movement.

## Chapter 6: Policy Analysis

The following chapter provides an overview and analysis of the relevant national and regional planning instruments, examining key principles and guidelines for development and land use management. The analysis then funnels down to highlight key components of the Central Otago District Plan. Finally, the analysis draws on a comparative assessment of other district plans regarding seasonal worker accommodation and explores examples of addressing the shortage of accommodation in other districts of New Zealand. This ultimately allow for a robust understanding of the relevant policies and frameworks pertaining to seasonal workers accommodation, providing valuable insight to inform policy decisions in Central Otago.

### 6.1 National Planning Frameworks

#### 6.1.1 Resource Management Act 1991

The Resource Management Act 1991 is a piece of New Zealand legislation that aims to guide the sustainable management of Aotearoa's natural and physical resources while providing for the social, economic, and cultural well-being of current and future generations (Resource Management Act, 1991). Under the RMA, local authorities are tasked with resource management decision-making through the development and implementation of regional and district plans.

District councils are tasked with managing land use and development in their district, including the provision of housing through plans, policies, and rules regarding environmental protection, building design and the provision of infrastructure. The RMA has been criticised as a key barrier to increasing housing supply through delays and long application processes (Shahzad, Hassan & Olabode Bamidele Rotimi, 2020). Central Otago's struggle to meet the demand for housing calls into question what changes might support the provision of housing, and in turn support the supply of accommodation for seasonal workers.

### 6.1.2 National Policy Statement for Highly productive Land

The National Policy Statement on Highly Productive Land (NPS-HPL) is a policy aimed at safeguarding and managing land with significant agricultural or horticultural potential. It recognises the crucial importance of these fertile areas for Aotearoa's economy, food security, and environmental sustainability. The policy focuses on preventing the irreversible loss of highly productive land by discouraging inappropriate subdivision, use, or development that could permanently degrade its productivity. NPS-HPL has implications for new seasonal worker development as district councils need to create planning rules and policies that avoid development of highly productive land by 2025 (LG Web, 2023). The NPS-HPL states that land in rural zones, or rural production zones are to be classified as rural land. In the context of Central Otago, most, if not all horticultural activities take place in the rural resource area.

Of particular importance to seasonal accommodation development in the rural area is Policy 3.9 which sets out that:

- (1) Territorial authorities must avoid the inappropriate use of development of highly productive land that is not land-based primary production.

This means that for rural land that is already used for horticultural or viticultural land-based primary production, the NPS-HPL should not be a significant barrier to the development of on-site accommodation for workers. Further, Section (2)(A) gives clarity on what supporting activities (such as on-site accommodation) may be excluded from this policy and the measures required:

*(2) A use or development of highly productive land is inappropriate except where at least one of the following applies to the use or development, and the measures in subclause (3) are applied:*

*(a) it provides for supporting activities on the land*

*Territorial authorities must take measures to ensure that any use or development on highly productive land:*

*(a) minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land in their district; and*

*(b) avoids if possible, or otherwise mitigates, any actual or potential reverse sensitivity effects on land-based primary production activities from the use or development. National Policy Statement for Highly Productive Land 2022 13*

## 6.2 Regional Policy Frameworks

This section outlines the key regional policy frameworks pertaining to Seasonal Workers Accommodation.

### 6.2.1 Proposed Otago Regional Policy Statement

The Otago Regional Policy Statement (RPS) sets out the strategic, high-level policies, objectives and methods for managing the region's natural and physical resources over a long term. Regional councils have a responsibility under the RMA 1991 to have a Regional Policy Statement that gives effect to all National Policy Statements and Planning Standards, and subsequently the RPS informs district and regional plans. They are required to be reviewed every ten years to address current and future resource management issues that may arise.

Of particular significance to seasonal workers accommodation are:

*UFD–O4 – Development in rural areas Development in Otago's rural areas occurs in a way that: (1) avoids impacts on significant values and features identified in this RPS, (2) avoids as the first priority, land and soils identified as highly productive by LF–LS–P19 unless there is an operational need for the development to be located in rural areas, (3) only provides for urban expansion, rural lifestyle and rural residential development and the establishment of sensitive activities, in locations identified through strategic planning or zoned within district plans as suitable for such development; and (4) outside of areas identified in (3), maintains and enhances the natural and physical resources that support the productive capacity, rural character, and long-term viability of the rural sector and rural communities.*

This shows the significant focus for the proposed RPS of managing the growth of residential activity within rural zones. As a land-use activity that supports rural productivity, seasonal accommodation is not classed as rural lifestyle development. This is a key point in determining the spatial growth of seasonal workers accommodation, whereby it's development within the rural zone is supported by this RPS. However, this poses a challenge when thinking about multi-use accommodation. If seasonal accommodation within the rural zone is used for non-workers (e.g. tourists) this could complicate its viability due to its contravention against Otago Regional Council's strategic direction.

*UFD-P7 –Rural Areas The management of rural areas: (1) provides for the maintenance and, wherever possible, enhancement of important features and values identified by this RPS, (2) outside areas identified in (1), maintains the productive capacity, amenity and character of rural areas, (3) enables primary production particularly on land or soils identified as highly productive in accordance with LF-LS-P19, (4) facilitates rural industry and supporting activities, (5) directs rural residential and rural lifestyle development to areas zoned for that purpose in accordance with UFD-P8, (6) restricts the establishment of residential activities, sensitive activities, and non-rural businesses which could adversely affect, including by way of reverse sensitivity, the productive capacity of highly productive land, primary production and rural industry activities, and (7) otherwise limits the establishment of residential activities, sensitive activities, and non-rural businesses to those that can demonstrate an operational need to be located in rural areas.*

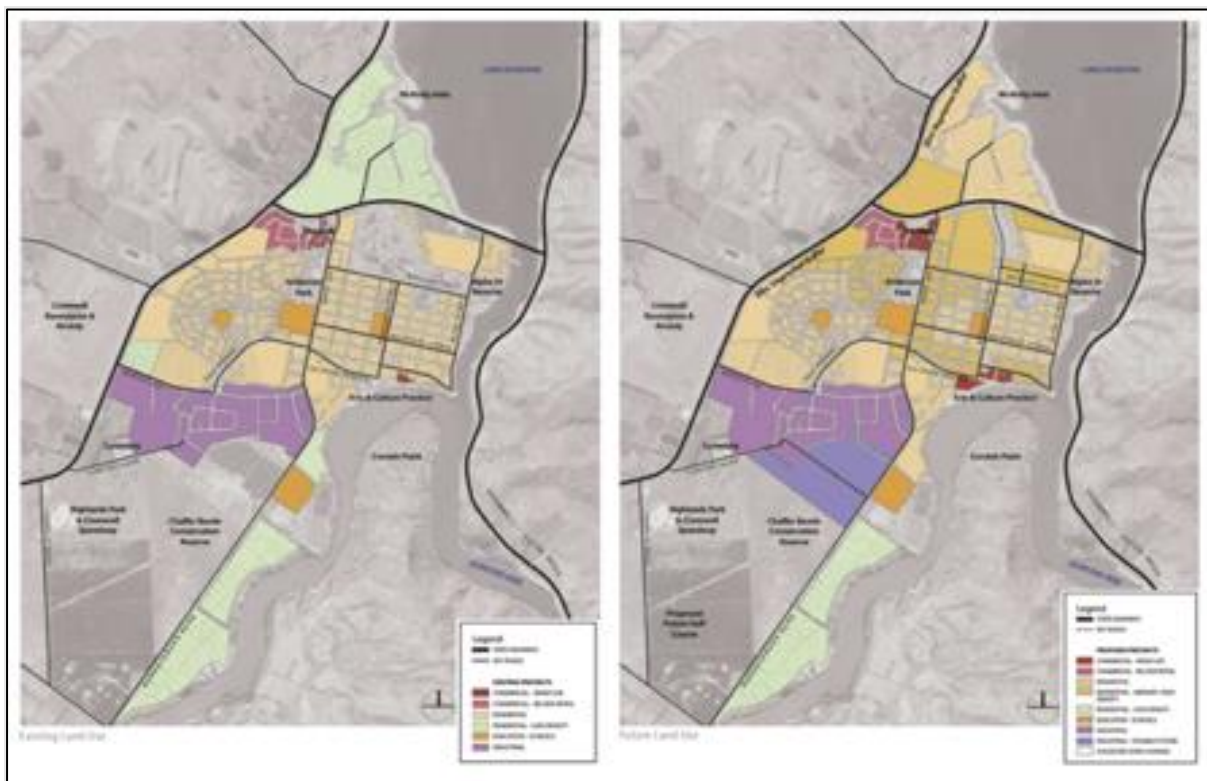
Further, this policy develops the UFD objective 4 above. It places focus on retaining the amenity and character of rural areas, which is a significant consideration for the development of seasonal accommodation due to the visual sensitivity that rural areas have because of the low numbers of built dwellings and structures. Visual effects will be discussed further below in the analysis of CODC plans and policies.

## 6.3 Central Otago District Frameworks

### 6.3.1 Cromwell Masterplan Spatial Framework

The Cromwell Spatial Framework is stage 1 of CODC's process towards Cromwell's "Eye to the future" Masterplan. It aims to address future growth in the township over the next 30 years.

The plan proposes some additions and alterations to existing zones. The first key change is an extension of the industrial zone southward. This presents the potential for development that is in close proximity to the township’s infrastructural services. Secondly, the addition of medium-high density zoning across different pockets of the township presents the opportunity to investigate how intensification can increase supply of housing, and in turn provide for seasonal housing options.



*Figure 6.1: Future Zone Changes illustrated in the Cromwell Masterplan Spatial Framework*

The Spatial plan identifies Lowburn as an area experiencing pressure due to seasonal workers camping in the area. Additionally, the plan identifies the concentration of viticulture in the area, and the prevalence of seasonal workers camping within Bannockburn. The plan aims to “consolidate” housing in Bannockburn ensure that the landscape values and settlement character are retained while supporting rural productivity and uses. Clarification whether “uses” include seasonal accommodation, is required to determine the opportunities that Bannockburn presents in meeting viticultural and horticultural housing demand. Retaining landscape values is a key consideration for solutions regarding seasonal workers accommodation, and this is explored in more depth under the analysis of the Central Otago District Plan rules and assessment.



### **6.3.2 Vincent Spatial Plan**

Alexandra is one of three key study areas for the purposes of this research. The Vincent spatial plan includes a section for the wider Alexandra/Clyde area, providing an overview of the key spatial challenges and opportunities, now and in the future. CODC aims to adapt to growth and increased housing supply by stimulating infill development in existing residential areas, as well as greenfield expansion at the edges of the townships which connects to existing community and service infrastructure. Part of the aim for this diversification of housing and its availability is to provide for seasonal workers accommodation needs, but a key challenge remains on how to provide affordable accommodation for short-term workers. However, it could present an opportunity for larger, jointly owned complexes to be developed, which could be enabled by unlocking land for a variety of housing to be built.

### **6.3.3 CODC Transport Activity Management Plan 2018**

The Central Otago District Council (CODC) published their latest Transport Activity Management Plan in 2018 to guide its efforts in managing and enhancing transportation throughout the region. The plan aims to promote safe, efficient, and sustainable transportation for both residents and visitors. It covers various areas, including road maintenance and upgrades, public transport, cycling and walking, and parking, while also considering the impacts of transportation on the environment and community well-being.

In the peak summer season, the influx of seasonal workers to the district in combination with the flow of holidaymakers puts immense pressure on the Central Otago Transport network. Understanding areas of increased demand on the network in this peak period is a crucial factor at play when investigating seasonal accommodation solutions. Seasonal workers accommodation can have a substantial impact on the transport network, due to the number of extra vehicles travelling to and from work premises and into centres to access goods and services. As there is no public transport in the district, many of these workers arrive in singles or couples in a private vehicle. The lack of provision for cycling and walking networks within rural zones means that these private vehicles are the main mode of transport to and from orchards. With the potential for sporadic development of seasonal accommodation across the district, and especially concentrated in the rural zones, it is important to understand the effects of increased traffic demand on the network.

## 6.4 Central Otago District Plan

This section outlines some of the key section pertaining to the provision of Seasonal workers Accommodation in Central Otago.

### 6.4.1 The Resources and significant Resource Management Issues of the District

This section sets out the strategic priorities for Central Otago District council in relation to the management of resources in the district. Of particular importance to seasonal accommodation is section 2.3.1 *Land*. It outlines the “distinctive characteristics” of Central Otago’s landscapes, and highlights the importance of preserving this character, both human-made and natural. It identifies an extensive list of:

1. Outstanding Natural Features and Outstanding Natural Landscapes
2. Significant Amenity Landscapes

Landscapes that are not listed in 1 & 2 and are part of the Rural Resource Area fall under 3. *Other rural landscapes (ORL)*. This is a crucial aspect of planning for on-site workers accommodation in the rural resource area, as section 6(b) applies to these ORL’s:

*Council must recognise and provide for the protection of outstanding natural features and outstanding natural landscapes from inappropriate subdivision, use and development as a matter of national importance. It should be noted that some sites and natural features within the identified outstanding natural features and outstanding natural landscapes have been modified by human activity (for example, farming, cultivation of tussock grasslands, mining, tracks, hydro development etc) which has affected their natural character values. In some instances it is acknowledged that outstanding natural landscapes incorporate outstanding natural features which are discussed in Section 2.3.2 of this plan.*

Providing for the protection of these outstanding natural features is a criterion to obtain resource consent for workers accommodation. There is an opportunity to explore how this criterion can be addressed by horticultural and viticultural businesses, to ensure that it does not become a disincentive to build accommodation. Additionally, further guidelines could be established to support development within the RRA that supports this strategic priority and aids

the horticultural and viticultural industry in finding solutions to the shortage of seasonal accommodation.

#### **6.4.2 Rural Resource Area**

Most Horticultural and Viticultural activities in Central Otago are situated within the Rural Resource Area. This is largely due to meeting the geographic requirements of crops such as stonefruit, apples and grapes, which all need certain soil types, climatic conditions, while also being able to access irrigation in many cases (CODC). The RuRA (Rural Resource Area) has been identified in the Central Otago District Plan as retaining a high natural character, with orchards and vineyards being described as enhancing outstanding natural landscapes and features (CODC).

A resource consent is required from Central Otago District plan in order to establish seasonal workers accommodation in the **rural area**. Seasonal workers accommodation refers to accommodation units that are used for part of the year.

When processing resource consent application for seasonal accommodation in the rural area of Central Otago, Council's discretion is restricted to the following:

1. Visual effects.
2. Management of the adverse effects of noise.
3. Management of the adverse effect of activities conducted on the site that are incidental to the seasonal workers accommodation.
4. The effect of the safe and efficient operation on the roading network and the provision for parking.
5. The management regime for the operation of the seasonal workers accommodation.
6. The provision of water, wastewater, electricity, and telecommunication services.

Seasonal Workers Accommodation for more than 60 people require resource consent for a full **discretionary activity**. The Council has unrestricted discretion when evaluating the application.

The numbers of toilets, basins and showers required will depend on whether the building is a single facility or a series of cabins (like a camping ground), the number of people

accommodated, whether the toilets are unisex, and where the toilets are positioned (i.e., separate or in a common lobby). In addition to basic amenities, a facility accommodating more than 6 people likely to have requirements around fire rating and alarms.

An example of an accommodation building with unisex toilets in a common lobby is detailed on Table 1.

Accommodation Building	10 people	20 people	60 people
Toilets	3	4	9
Basins	1	1	2
Shower	2	2	6

*Table 6.1: Number of Toilets, Basins and Shower per Number of People*

## 6.5 Comparative policy analysis of seasonal workers accommodation across regions

This section focuses on how different councils in New Zealand are handling the accommodation needs of seasonal workers. However, providing safe and comfortable accommodation for these workers has been a challenge for different councils in New Zealand. Different approaches by various councils are explored in addressing the shortages of seasonal worker accommodation including their policies, objectives and methods. Comparative assessments of different council approaches will be discussed under methodology section.

### 6.5.1 Tasman District Council

The Tasman Resource Management Plan does not provide rules or regulations for providing seasonal worker accommodation. The inclusion of land-use for building construction is limited to situations defined under Section 17.6 Rural 2 Zone, specifically Rule 17.6.3.2 (c)(d)(da).

‘(c) All buildings which are part of workers’ accommodation are relocatable. (d) The site of the workers’ accommodation has a minimum area of 50 hectares. (da) The site is not part of a cooperative living activity’ (Tasman District Council, n.d.).

This type of activity is considered a **controlled activity**. A resource consent is required and may include conditions on the following matters over which the Council has reserved control (Tasman District Council, n.d.):

*(1) The location of the building on the site and the effects on the potential availability of productive land.*

*(2) Location and effects of on-site servicing, including wastewater disposal, access, and traffic safety.*

*(2A) Where any land is subject to any deferred urban zone, the adverse effects of the building on future opportunities for efficient subdivision, use, and development of the land or of any other land in the area that is deferred, for the purposes of the relevant urban zone once it takes effect.(3) Effects on the amenities of the area and the potential impact for existing productive activities to be adversely affected by complaints from new residential activities arising from adverse cross-boundary effects.*

*(3A) Where a proposed building location cannot comply with the 30-metre setback rule due to the shape of the site, the potential to mitigate the effects from any reduced setbacks for habitable buildings through measures such as building location, orientation, design, fencing or screening, and clustering of residential activities.*

*(4) Effects of any proposed outdoor storage of goods, machinery or produce.*

*(5) For buildings that exceed the permitted activity height, in addition to the other matters listed, the appearance and visual impact (including colour, materials, surface treatment and fenestration), site landscaping and planting, shading effects across site boundaries, and effects on significant views, ridgelines and hill tops.(5A) Effects of buildings, including dwellings, where they exceed building coverage, on rural*

*amenity and character, and potential for reverse sensitivity effects on plant and animal production.(5B) Low impact building design.*

*(6) The on-site management of stormwater in accordance with Low Impact Design solutions.*

*(6A) The extent to which the effects of natural hazards, within and beyond the boundaries of the site, including wildfire risk and coastal, flood, stormwater, geotechnical or earthquake hazards will be avoided or mitigated.*

*(7) Alternatives for fire risk management.*

*(8) The duration of the consent (Section 123 of the Act) and the timing of reviews of conditions and purpose of reviews (Section 128).*

*(9) Financial contributions, bonds and covenants in respect of the performance of conditions, and administrative charges (Section 1).*

### **6.5.2 Central Hawkes Bay District Council**

In Central Hawkes Bay, within the rural zones containing orchards and farms, landowners have the "as of right" privilege to construct buildings up to 7% or 700m<sup>2</sup> in size without the need for a resource consent if they comply with the boundary setback regulations. This provision can be utilized to create accommodation for seasonal workers (see Appendix C). Temporary buildings are classified as permitted activities in all zones, if their gross area does not exceed 50 m<sup>2</sup> and they can be present on the site for a maximum duration of twelve months (Central Hawkes Bay, n.d.a).

Both the Rural Production Zone and General Rural Zone outline regulations pertaining to seasonal worker accommodation which will be explored in this section. This provision offers employers the flexibility to house their seasonal workers.

#### **6.5.2.1 General Rural Zone**

General Rural Zone designates seasonal workers accommodation as a permitted activity, provided that it adheres to the district plan rules specified in Table 6.2 Any breach of these rules would classify the proposal for seasonal worker accommodation as a discretionary

activity. In such cases, the assessment process may involve the imposition of conditions where Council has a discretion of under Appendix D.

*Table 6.2: Name of Rules for a Permitted Activity in General Rural Zone (Source: Central Hawkes Bay, n.d.b.)*

<b>SECTION</b>	<b>NAME OF RULES</b>
GRUZ - S2	Height of Buildings
GRUZ - S3	Height in Relations to Boundary
GRUZ - S4	Setback from Roads and Rail Network
GRUZ - S5	Setback from Neighbours
GRUZ - S6	Shading of Land and Roads
GRUZ - S7	Electricity Safety Distances
GRUZ - S8	Transport (access, parking, loading)
GRUZ - S9	Light
GRUZ - S10	Noise

#### **6.5.2.2 Rural Production Zone**

The construction of seasonal workers accommodation falls under the category of a permitted activity within the Rural Production Zone, given that it meets the requirements outlined in Table 6.3. Any violation of these rules would classify the project as a discretionary activity.

The assessment process conducted by the Council for discretionary activities is not only limited to the factors specified on Appendix C, but these may be taken into consideration along with other relevant factors (Central Hawkes Bay, n.d.b).

*Table 6.3: Name of Rules for a Permitted Activity in General Rural Zone (Source: Central Hawkes Bay, n.d.b.)*

<b>SECTION</b>	<b>NAME OF RULES</b>
RPROZ S-2	Total Building Coverage
RPROZ S-3	Height of Buildings
RPROZ S-4	Height in Relation to Boundary
RPROZ S-5	Setback from Roads and Rail Network
RPROZ S-6	Setback from Neighbours
RPROZ S-7	Shading of Land and Roads
RPROZ S-8	Electricity Safety Distances
RPROZ S-9	Transport (access, parking, loading)
RPROZ S-10	Light
RPROZ S-11	Noise



### **6.5.3 Far North District Council**

In the Far North District Council, there is currently a lack of specific guidelines or rules in their district plans pertaining to seasonal worker accommodation. The council's approach to such accommodation is primarily guided by the zoning rules stated in the district plan of the respective area where its construction or establishment is proposed (refer to Appendix F).

### **6.5.4 Marlborough District Council**

Marlborough District Council have a “catch all” approach where there are no seasonal worker accommodation rules in a specific zone. However, an accommodation guideline has been developed to emphasise the importance providing and maintaining suitable accommodation. These guidelines were implemented in November 2013 and are aimed at promoting safe, healthy, and sustainable accommodation practices within the district (see Appendix U).

The Council has also established guidelines for seasonal worker accommodation, which include guidelines on construction, fire safety, lighting and ventilation, cooking facilities, refrigeration requirements, dining facilities and furniture, casual recreational space, bedrooms, washing facilities, laundry facilities, sanitary conveniences, water, heating, and rubbish disposal.

The Marlborough District Council has established additional regulations in conjunction with the guidelines for seasonal worker accommodation. Under Section 30.1.2 Infrastructure and Services, Rule 30.1.2.2 specifically requires that all car parking for seasonal workers must be provided on-site (Marlborough District Council, n.d.a). These requirements complement the provisions outlined in Section 27.2, which addresses vehicle loading, and Section 27.2.3, which focuses on vehicle parking (Marlborough District Council, n.d.b).

### **6.5.5 Hastings District Council**

The Hastings District Council introduced Plan Change 1 (Variation 7) (see Appendix H) to the Proposed District Plan in August 2019 as a proposal. The objective of this proposal is to authorise seasonal worker accommodation within the Light Industrial and General Industrial zones situated in Omahu and Irongate. Furthermore, the variation seeks to establish a more practical scale for seasonal worker accommodation within the Plains Production zone. It is

important to note that this Plan Change has been successfully implemented and is currently in effect.

Outcomes, objectives and policies for seasonal worker accommodation in the Light Industrial and General Industrial zones are outlined in Table 6.4 and 6.5.

*Table 6.4: Anticipated outcomes in Light Industrial Zone*

<b>RULE</b>	<b>OUTCOMES</b>
<b><i>LIA01</i></b>	<i>Efficient use and redevelopment of industrial land and infrastructure by concentration of industrial development within existing zones</i>
<b><i>LIA02</i></b>	<i>Avoidance of incompatible activities within Industrial Zones.</i>
<b><i>LIA03</i></b>	<i>Retention and reinforcement of buffers between incompatible activities on opposing zones, with a particular focus between industrial and residential activities.</i>
<b><i>LIA04</i></b>	<i>Industrial development does not reduce the existing environmental and amenity qualities within existing Industrial Zones.</i>
<b><i>LIA05</i></b>	<i>Maintenance of amenity values which are appropriate and consistent with existing industrial areas within the district.</i>

*Table 6.5: Objectives and Policies for Seasonal Worker Accommodation*

<b>POLICY</b>	<b>EXPLANATION</b>
<p><i><b>LIZP2</b> Ensure appropriate provision for the operation, intensification and expansion of major primary processing and construction industries that make a significant contribution to the District and Regional economies, while avoiding, remedying or mitigating effects on the surrounding environment.</i></p>	<p><i>The Hastings <u>District</u> contains a number of high profile industries which are recognised on a national and international basis and contribute significantly to the Hastings and Hawke's Bay economy and provide a number of jobs for the Hawke's Bay population. These businesses are primarily related to the primary processing and construction industries.</i></p>
<p><i><b>LIZP2A</b> Provide for seasonal worker accommodation subject to appropriate limits on effects to recognise its links to the horticulture industry and its compatibility with light industry and adjacent residential environments.</i></p>	<p><i>The light industrial zones are often adjacent to the residential environment thereby acting as a transition between the general industrial and residential environments. As such seasonal worker accommodation is an activity that has a level of effects that is compatible with this transitional environment.</i></p>

#### **6.5.5.1 Light Industrial Zone**

The Light Industrial zone accommodates small-scale and engineering enterprises that serve both rural and residential sectors. It is identified by its small-sized lots that are convenient for activities such as mechanics, trade shops, workshops, and other similar operations. Businesses in the Light Industrial Zone require less visibility and are generally located away from the main roads in the district.

The strategies utilised in the Light Industrial Zone are restricted to the service industrial areas in Hastings City that are established and situated near residential or commercial centres. The main objective is to minimise any harmful impact on sensitive neighbouring uses, hence stringent environmental standards are enforced. As a result, this zone is most suitable for lighter or service-oriented activities. The provision of service industry near residential areas has added social and economic advantages, and in the case of Hastings City, it also guarantees that adequate support services are nearby to the primary shopping regions in the Central Business District.

The regulations pertaining to seasonal worker accommodation can be found in Section 7.5.7.8 of the Hastings District Council's district plan. According to these rules, a maximum of 300 workers is considered restricted discretionary activity (Hastings District Council, n.d.a). Rule L115A and different assessments of effects are discussed below.

**Rule LI15A** states that Seasonal Worker Accommodation up to a maximum of 300 workers is a **restricted discretionary activity** (Hastings District Council, n.d.a) and

*“a) The activity shall comply with the acoustic insulation requirements for noise sensitive activities as set out in standard 25.1.7C*

*b) An area of outdoor open space equating to 10m<sup>2</sup> per resident be provided for on the site. The open space area is to be of a shape appropriate for undertaking active recreation activities such as touch rugby, football of basketball.*

*b.1) The activity shall comply with the acoustic insulation requirements for noise sensitive activities as set out in standard 25.1.7C*

*b.2) An area of outdoor open space equating to 10m<sup>2</sup> per resident be provided for on the site. The open space area is to be of a shape appropriate for undertaking active recreation activities such as touch rugby, football of basketball”.*

The different assessment of effects under restricted discretionary activity in Light Industrial Zone are:

- a) The ability of the existing infrastructure to provide water, wastewater and stormwater disposal.*
- (b) Whether safe and efficient vehicle access can be provided to the site.*
- (c) Whether the proposal can provide sufficient on-site car parking.*
- (d) Whether the activity will have reverse sensitivity effects on adjoining activities.*
- (e) The proposed accommodation management plan and practices.*
- (f) Whether there is sufficient landscaping/open space to provide for the amenity of the workers.*
- (g) Whether the open space is appropriately connected to the accommodation units and is of a shape /layout to allow for active recreation activities.*

#### **6.5.5.2 General Industrial Zone**

The General Industrial Zone is applied to the major industrial nodes of the District at Tomoana, Whakatu, Omahu Road, Irongate and in the King Street/Nelson Street areas. These areas are suitable for a wide range of industrial activities provided significant adverse effects are avoided, remedied or mitigated.

Section 14.1.7.9 chapter refers to rules in seasonal workers accommodation in the Omahu and Irongate Industrial zones. This was based on the amendment proposed by Variation 7 on Section 14.1.7.9 of the District Plan (Hastings District Council, n.d.b). The different types of activities for this zone are on Table 6.6, and the requirements that need to be met are:

- “(a) An area of outdoor open space equating to 10m<sup>2</sup> per resident be provided for on the site. The open space area is to be of a shape appropriate for undertaking active recreation activities such as touch rugby, football or basketball.*
- (b) The activity shall comply with the acoustic insulation requirements for noise sensitive activities set out in standard 25.1.7C.*
- (c) All new buildings which are part of the seasonal workers accommodation shall be relocatable or able to be reconfigured to an industrial purpose.*

*(d) a 1.8m high solid fence shall be provided along the full length of any side or rear boundary of the site.*

*Advice Notes:*

*(1) Applicants should be aware that where on-site servicing of the facility is to be undertaken, resource consent from the Hawke's Bay Regional Council will be required for wastewater and stormwater discharges.*

*(2) Applicants may need to transfer an existing permit or provide drinking water within existing allocations and that drinking water will need to meet the requirements of the New Zealand Drinking Water Standards and Health Act.”*

*Table 6.6: Seasonal Worker Accommodation Rules in General Industrial Zone*

<b>RULE</b>	<b>LAND USE ACTIVITIES</b>	<b>ACTIVITY STATUS</b>
<b><i>GI11</i></b>	<i>Seasonal workers accommodation in the Omahu and Irongate General Industrial zones - up to a maximum of 300 workers.</i>	<i>Restricted Discretionary</i>
<b><i>GI14A</i></b>	<i>Seasonal workers accommodation in the Omahu and Irongate General Industrial Zones in excess of 300 workers</i>	<i>Discretionary</i>
<b><i>GI18</i></b>	<i>Any activity which is not provided for as a Permitted, Restricted Discretionary or Discretionary Activity. To avoid any doubt this includes seasonal workers accommodation that does not comply with the wastewater performance standard 14.1.6A.10.</i>	<i>Non-Complying</i>

The expected outcomes of seasonal worker accommodation in General Industrial Zone are: 1) the acoustic requirements will ensure that potential conflicts between adjoining land Uses are mitigated, 2) outdoor amenity for the residents is an important component of the accommodation facilities and should be of a form able to meet active recreational needs, 3) in the event that seasonal workers are no longer required Buildings can either be removed or reconfigured to readily allow for industrial use of the site, and 4) the protection of adjoining activities from matters of reverse sensitivity

There is assessment of effects for this kind of activity which is stipulated on Section 14.1.8.5. The following assessment of effects shall be made considering the following (Hastings District Council, n.d.b):

- a. *“The ability of the existing infrastructure to provide for the volume of water, wastewater, and stormwater disposal arising from the activity.*
- b. *Whether safe and efficient vehicle access can be provided to the site.*
- c. *Whether the proposal can provide sufficient on-site carparking.*
- d. *Whether the activity will have reverse sensitivity effects on adjoining activities.*
- e. *The proposed accommodation management plans, and practices.*
- f. *Whether there is sufficient landscaping/open space to provide for the amenity of the workers.*
- g. *Whether the open space is appropriately connected to the accommodation units and is of a shape/layout to allow for active recreation activities to take place.*
- h. *Consideration of any cumulative effects of seasonal workers accommodation, especially on the unconfined aquifer and source protection zones (SPZ)”.*

### **6.5.5.3 Plains Production Zone**

The Plains Production Zone recognises the growing power of the district in Hastings. It is the focus for cropping, viticulture and orcharding in the region. The policies on Appendix I, methods and rules (Table 6.7), and outcomes are identified to establish the overall direction of the management of Plains Production Zone including the seasonal worker accommodation.

*Table 6.7: District Plan Rules for Seasonal Worker Accommodation in Plains Production Zone*

<b>RULE</b>	<b>LAND USE ACTIVITIES</b>	<b>ACTIVITY STATUS</b>
<b><i>PP9</i></b>	<i>Seasonal Workers Accommodation up to a maximum of 125m<sup>2</sup> gross floor area.</i>	<i>Permitted</i>
<b><i>PP23A</i></b>	<i>Seasonal Worker accommodation over 125m<sup>2</sup> with up to 80 workers.</i>	<i>Restricted Discretionary</i>
<b><i>PP37A</i></b>	<i>Seasonal Worker Accommodation over 125m<sup>2</sup> with up to 80 workers not complying with Specific Performance Standard 6.2.6K(4).</i>	<i>Discretionary</i>

The Hastings District Council has a set of rules and requirements for seasonal workers' accommodation. The maximum number of people allowed on-site is 80, and any new buildings for this purpose must be relocatable or able to be reconfigured for land-based primary production. Additionally, buildings associated with seasonal workers' accommodation must be at least 15 meters away from roads or adjoining property boundaries, and the site should have a minimum area of 12 hectares (except for accommodation at or below 125m<sup>2</sup> gfa). Rule 6.2.8J specifies that an assessment of the effects of the activity must be conducted, considering various factors such as efficient land use, the compatibility of the building's scale and design with the area's character, impact on neighbouring properties, soil values, safe vehicle access, on-site servicing, and cumulative effects on the land resource and the unconfined aquifer and source protection zones. The advice notes remind applicants of the need for resource consent from the Hawke's Bay Regional Council for wastewater and stormwater discharge and compliance with New Zealand Drinking Water Standards and Health Act requirements if on-site servicing includes drinking water (Hastings District Council, n.d.c).



## 6.6 Comparative Assessment of other District Plans Regarding Seasonal Workers Accommodation

To gather a comprehensive view on the district plan rules of seasonal worker accommodation in New Zealand, email inquiries were sent to different councils where the majority of seasonal workers are employed. The objective of this inquiry was to determine if there are existing rules that must be followed or if a resource consent is required for this type of activity in different districts or councils in New Zealand.

This assessment seeks to identify any gaps in the existing rules and regulations of Central Otago District Plan. Table 6.8 summarizes the different Councils who have rules in place in their respective district plans.

*Table 6.8: Overview of Councils with Regulations for Seasonal Worker Accommodation*

<b>Council</b>	<b>With Seasonal Accommodation rules for Industrial Zone</b>	<b>With Seasonal Accommodation rules in Rural Zone</b>	<b>No rules in place</b>
Central Otago District Council		√	
Hastings District Council	√	√	
Central Hawkes Bay		√	
Marlborough District Council			√
Far North District Council			√
Tasman District Council			√

### **6.6.1 Types of Activities**

Based on the information gathered, there are few councils which have rules in place for seasonal worker accommodation. These are Central Otago District Council, Hastings District Council, and Central Hawkes Bay District Council.

The Central Otago District Council and Central Hawkes Bay District Council have established regulations for seasonal worker accommodation in their rural zones. These rules are designed to govern and oversee the utilization of land for seasonal worker accommodation and associated activities within specific areas of their respective districts. The primary objective is to strike a balance between the economic advantages derived from the horticultural industry and the potential negative impacts on the environment and local community, albeit with more stringent measures in place.

The Central Hawkes Bay District Council has categorized activities related to seasonal worker accommodation into two types: permitted and discretionary. By allowing permitted activities, there is a greater potential to enhance the supply of seasonal worker accommodation, thereby benefiting the horticultural and viticulture industry in the region.

In contrast, the Central Otago District Council has established two types of activities, namely restricted and discretionary, for the establishment of seasonal worker accommodation in rural areas. While restricted and discretionary activities help regulate and oversee the utilization of land for seasonal worker accommodation, they may also impose limitations on the development of new accommodations. This restriction can further strain the supply of seasonal worker accommodation, leading to increased competition among employers and workers and potentially driving up rental prices.

In both cases for Central Otago District Council and Central Hawkes Bay District Council, there is a critical need to design and implement rules for seasonal worker accommodation that promote sustainable development by effectively balancing the economic benefits derived from the horticulture and viticulture industries. However, the disadvantage of restricting the construction of seasonal worker accommodation to specific zones is that it may not be in areas easily accessible to the workers.

The Hastings District Council has implemented seasonal worker accommodation rules within the Industrial Zone and Plain Production Zone. This approach can reduce potential conflicts with other land uses and minimise adverse impacts on the environment and community amenities. In contrast, the Marlborough District Council, Tasman District Council, and Far North District Council do not have a specific approach for seasonal worker accommodation but adhere to the rules of the zone where the seasonal accommodation development will be established.

The advantage of this "catch-all" approach is that it prevents the concentration of particular land uses in a specific area, which can have negative environmental and residential impacts. By allowing for a mixture of land uses, including seasonal worker accommodation facilities, the effects of these land uses can be more evenly distributed.

In conclusion, the concentrated seasonal accommodation approach implemented within the Industrial Zone and Plain Production Zone by the Hastings District Council, as well as the "catch-all" approach followed by the Marlborough District Council, Tasman District Council, and Far North District Council, offer increased flexibility, and contribute to the promotion of sustainable resource management.

### **6.6.2 Assessment of Effects**

Based on the information from different District Plans, it seems that the assessment of the effects of various activities across districts is consistent. The key factors that are taken into consideration include amenity values, landscaping, access to infrastructure such as water and wastewater, vehicle access, car parking, reverse sensitivity, and noise.

### **6.6.3 Building Regulations 1992**

The Building Code, which is included in Schedule 1 of the Building Regulations 1992, outlines the performance criteria that must be met for building work in New Zealand. It covers areas such as structural stability, accessibility, moisture control, durability, services and facilities, fire protection, and energy efficiency. Instead of prescribing specific methods or products to be used, the Building Code focuses on how completed building work and its components should perform, allowing for flexibility in design and technology innovation. This

performance-based approach allows for development and innovation in building design and technology, which is a significant advantage (Horticulture New Zealand, 2018).

Marlborough District Council has published an accommodation guideline in November 2013 (Marlborough District Council, 2013). This is developed to help accommodation providers of their responsibility to maintain a suitable accommodation that is considered safe and sanitary for seasonal workers.

In the Building Code context, Marlborough District Council (2013) emphasised that construction of accommodation should utilise durable materials that effectively block sound and provide complete protection against weather conditions. The interior walls should be appropriately lined and equipped with suitable thermal insulation. The floors should be robust, resistant to drafts, and adequately covered. Additionally, any newly constructed or renovated premises must adhere to the regulations set forth in the current Building Act of 2004 and the New Zealand Building Code.

In terms of fire safety, Marlborough District Council imposed that smoke alarms should meet the standards set by the NZ Building Code. This should be installed in bedrooms and living areas to ensure compliance. A household escape plan should be prepared and prominently displayed in a common area. Additionally, a fire blanket should be provided and easily accessible in the kitchen for immediate use.

## 6.7 Case examples of Addressing the Shortage of Seasonal Workers Accommodation Across Regions

In this section, several examples will be discussed to illustrate how the issue of seasonal worker accommodation shortages has been addressed in certain parts of New Zealand, specifically in the Marlborough region and Hastings. The information presented in these articles is supported by the resource consents approved by the councils, which are official documents that authorise certain land use activities.

### 6.7.1 Marlborough: 3023 State Highway 1, Riverlands

An article titled “Vineyard worker accommodation critical to Marlborough’s \$1 billion grape industry” was published on stuff.co.nz by Watson in 2017. According to the author, the former

Country Life Motel site on the outskirts of Blenheim will be developed as RSE accommodation for over 400 RSE (recognised seasonal employment) vineyard workers.

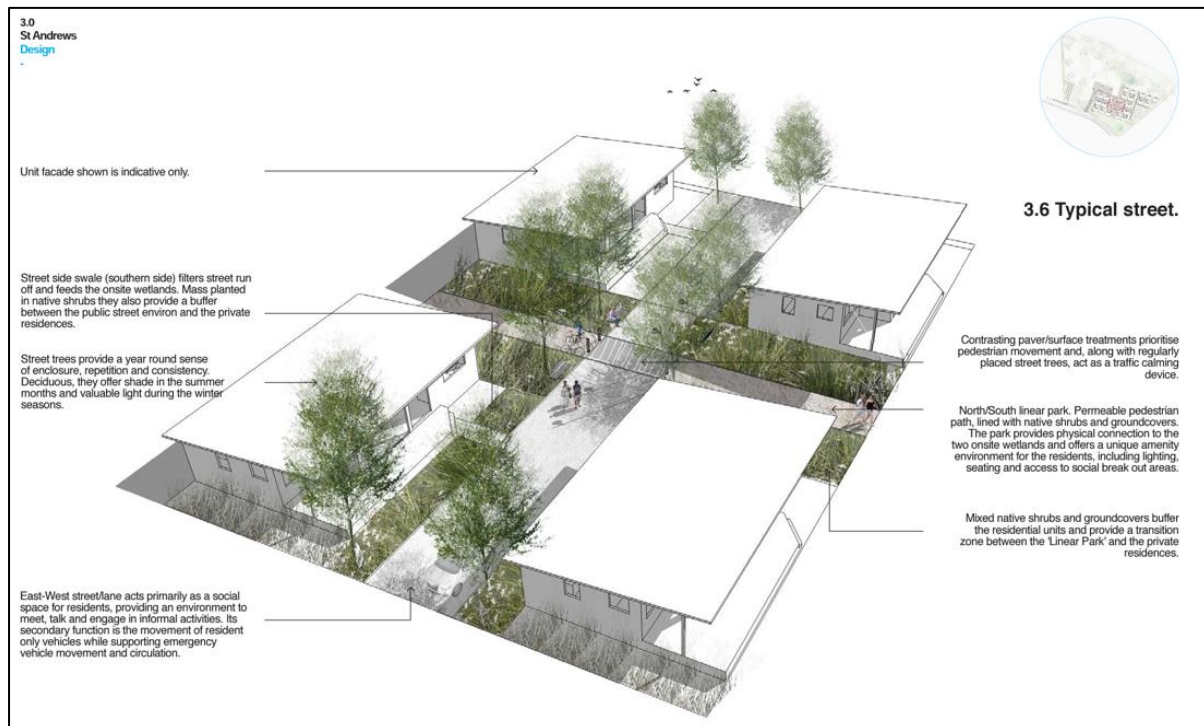


Figure 6.1. Proposed Plan at 3023 State Highway 1, Riverlands (Source: Watson, 2017)

Richard Oliver, Developer of St Andrews Property Group, expressed this will solve the accommodation crisis in Marlborough. A fully integrated residential accommodation facility would provide a solution and a safe haven for migrant workers to socialise together without access to anti-social pressures, involving drugs and alcohol.

A resource consent was sought to redevelop and extend the existing 34-unit Country Life Motel (Figure 6.1) at 3023 State Highway 1 Riverlands to create an integrated accommodation facility for up to 418 Recognised Seasonal Employer (RSE) workers, on 29 November 2016 (see Appendix J). Additional proposed land use activities in the application are:

a) to undertake a commercial activity in the rural zone for the operation of an onsite professional office for worker administration and convenience shop in the rural zone

- b) to exceed site coverage in the rural zone b 15%
- c) change of land use within an identified HAIL site under NES-Contaminated Soil
- d) Dispensation from car parking standards for an activity required to provide parking for more than 75 vehicles on a site and to provide 60 carparks, requiring a dispensation of <sup>FL</sup>SEP 59 carparks.
- e) water permit

The proposed development will be in the rural zone. The council publicly notified and processed the application as a non-complying activity. Application is non-complying because of the construction of water supply pipeline, stormwater outlet, ancillary infrastructure through stop bank and river berm. Other breach rules were assessed as controlled and discretionary activities, but the application will be processed as non-complying, as this is the most stringent activity. The proposed site plan is illustrated in Figure 6.2.



Figure 6.2: Proposed Site Plan in 3023 State Highway 1, Riverlands (Source: Resource Consent Application, see Appendix J)

The principal matters of contention on the actual and potential effects on the environment that emerged from submissions which was discussed in the decision are: a) rural character and amenity values, b) traffic effects, c. effects on primary production, d. effects on water resources, e. flooding on private land, and f) positive effects.

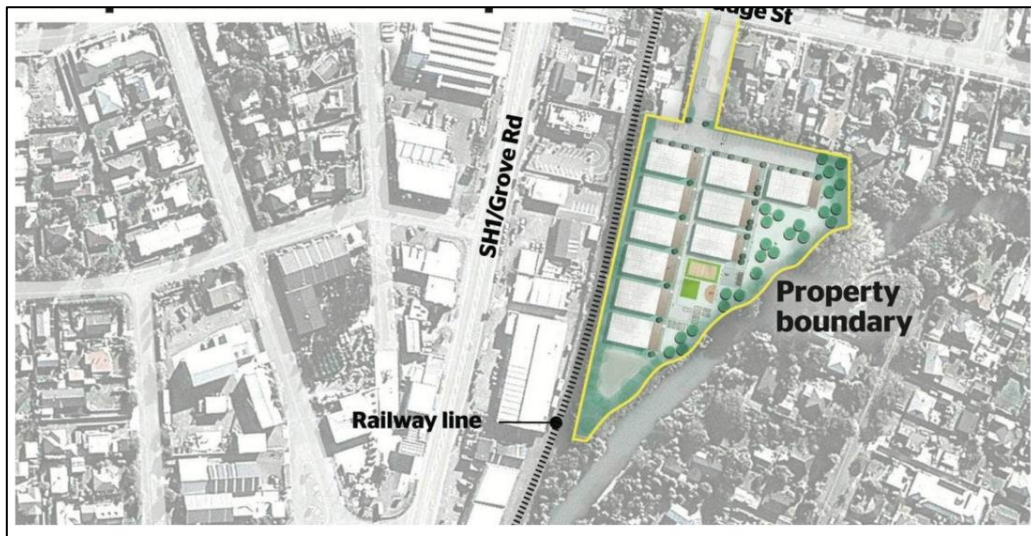
Decision was granted on the basis of conditions imposed on the following: a) Land disturbance, b) NES-Contaminated Soil (change of use), c) Internal roads, d) accessway and pedestrian facilities, e) on-site parking, f) landscaping, g) access to river, h) lighting, i) construction noise, f) operational noise, g) wastewater discharge, h) review of conditions and monitoring timeframe, i) stormwater, j) reverse sensitivity, k) reconstruction of office/common room building, and l) firefighting standards.

### **6.7.2 Blenheim: 36 and 36A Budge Street, Riversdale**

According to Eder (2018) the company Seasonal Labour Accommodation Provider has proposed a new seasonal worker village that could house up to 240 people, illustrated in Figure 6.3 and 6.4. The proposal states that workers would sleep in 10 single storey buildings where each building is equipped with lounge, kitchen and a dining room, and a deck for socialising. The site proposal includes recreational and social spaces, with vegetable gardens, fruit trees, outdoor seating and tables, and space to play sports.



*Figure 6.3: Multi Complex Proposed Plan –at 36 and 36A Budge Street (Source: Eder, 2018)*



*Figure 6.4. Multi Complex Site Plan - 36 and 36A Budge Street (Source: Eder, 2018)*

According to a 2020 survey conducted by the Marlborough District Council (2020), the number of available accommodations for seasonal workers in Blenheim has significantly increased since 2018, with a total of 2,525 accommodations now available. Of this increase, 35% can be attributed to purpose-built accommodations (Marlborough District Council, 2021). The applicant lodged the resource consent on 23 Nov 2017 under discretionary activity, and the council issued the decision on 17 April 2018 (Appendix K). The proposed activity was in the Urban Residential 2 Zone and the Budge Street is identified as a Collector Route. This application was publicly notified.

The Section 42 Planners report states the proposed site is next to commercial/industrial area and faces two backpacker facilities on Budge Street. The external adverse amenity effects are likely to be localised to nearby properties on Budge Street. Adverse effects could be mitigated through the provision and maintenance of an acoustic fence with plantings of shrubs and trees of sufficient height and depth to screen the proposed buildings and outdoor areas. Such measures were proposed in addition to the landscaping master plan's existing mitigation strategies (Johnson, n.d.).



The summary of environmental effects shows that the proposed facility would have a positive impact on the wellbeing of seasonal workers, and the wider community, primarily through providing a tightly managed residential and recreational facility which caters for the needs of seasonal workers. Subject to conditions, the proposal is also likely to have acceptable adverse effects on the road network. However, despite the significant mitigation measures outlined in the landscaping master plan and additional fencing conditions that could be imposed, the proposal may still have an adverse effect on the existing residential amenities of neighbouring properties, primarily due to noise generated by the relatively high number of residents on the site.

The principal issues discussed in the decision reports are contention on permitted baseline, noise effects, traffic and parking, landscaping, and resident's amenity and welfare. Conditions imposed, including Management Plan to address various types of effects on the environment and in the residential community. Review of conditions and monitoring timeframe is in place in dealing with:

A) Any adverse effects which become apparent from the exercise of this consent, and which are therefore appropriate to be dealt with at that later stage; or

1. Any long-term shortfall of on-site parking which results in a shortage of on-street parking on Budge Street.
2. Traffic movements that result in congestion or safety hazards on Budge Street.

### **6.7.3 Hastings: 1347 Omahu Road**

As an increasing number of workers arrive in Hawke's Bay, more purpose-built accommodation is being made available. The Omahu Road RSE site is of the largest purpose-built accommodations in the region (Figure 6.5 and 6.6), with 12 five-bedroom units and 16 two-bedroom units. In addition, the site also features an outdoor volleyball court, providing a fun and engaging way for residents (Pang, 2023).



*Figure 6.5: Built multi-complex facility in Hastings (Source: Stuff.co.nz Pang 2023)*

A resource consent was lodged for a proposed RSE Complex to be located in 1347 Omaha Road, Hastings. The overall bundling assessment status of the proposed RSE accommodation is a non-complying activity.



*Figure 6.6: Proposed Site Plan for a multi-complex facility in Hastings (Source: Resource Consent Application, see Appendix M)*

The application triggered the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES Status) as a Restricted Discretionary Activity. Seasonal Workers Accommodation is not specifically catered for within the Industrial Zone rules set out in Section 14.1 of the Proposed Hastings District Plan. Therefore, the subject site for seasonal workers accommodation is classified as a non-complying activity in accordance with Rule GI16 which states as “Any activity which is not provided for as a Permitted, Controlled, Restricted or Discretionary shall be a non-complying activity”.

The Assessment of Actual and Potential Environmental Effects included in the application were earthworks effects, visual amenity, scale and character, transport effects, servicing, reverse sensitivity, natural hazards, and positive effects. The resource consent decision was granted based on conditions imposed on landscaping and screening plan, engineering conditions which include connection to council services and vehicle crossing, management of contaminated soil, services and earthworks, seasonal workers management plan, on-site noise generation, parking condition, archaeological condition, building design-acoustics, land use covenant- reverse sensitivity, review of conditions, and monitoring condition.

## 6.8 Relevance of multi-complex case studies to provision of Seasonal Workers Accommodation in Central Otago

The multi-complex accommodation in this study shows that it can provide a substantial capacity to house a significant number of seasonal workers efficiently. As the demand for seasonal workers increases during peak seasons, these multi complex facilities can accommodate the workforce influx without compromising on living conditions. Well-planned multi-complex-built accommodations can be integrated into the existing community in Central Otago in a way that benefits both seasonal workers and the residents. By providing this type of accommodation for seasonal workers, the demand for housing in the local community may be relieved. This can reduce competition for rental properties and housing units, making it easier for residents to find suitable housing at affordable prices.

By developing multi-complex-built accommodations, Central Otago can establish a sustainable long-term solution to seasonal worker accommodation shortages. Once in place, these facilities can serve the needs of seasonal workers over the years, reducing the need for constant adjustments and frequent investments in new accommodations.

## 6.9 Conclusion

Implementing effective policies to address shortages of seasonal workers is important for maintaining the stability and growth of horticultural and viticulture industries which are heavily reliant on seasonal workers. Addressing seasonal workers accommodation problems through policy change will safeguard the well-being of workers and ensuring labour market stability.

## Chapter 7: Results

This chapter presents the key findings from the survey respondents and interviews with key informants. This results chapter provides a comprehensive overview of the interview findings, aiming to highlight key themes, challenges, and potential solutions that emerged during the data gathering. To ensure a well-rounded perspective and to minimize bias, an online survey from fifty (50) seasonal workers was undertaken and an interview was conducted with fifteen (15) key informants. The different key informants included in this case study are employers, seasonal workers, accommodation providers, and council employees involved in community and regulatory matters.

### 7.1 Perception of Responsibility Regarding Seasonal Workers Accommodation

The following section examines the various perspectives and opinions regarding the obligation to provide affordable and accessible housing for seasonal workers. It presents the viewpoints of key stakeholders, including employers, local governments, and housing providers. The findings shed light on the complexities and diverse perspectives surrounding this issue. The findings highlight the importance of collaborative discussions and shared responsibility to ensure that seasonal workers have access to suitable and sustainable accommodation options. In the context of this study, 'responsibility' refers to the perceived obligations and responsibilities of various stakeholders in relation to the provision housing for seasonal employees.

#### **7.1.2 Employers Perception of Responsibility**

Employers are frequently viewed as the immediate stakeholders responsible for providing or assisting in the provision of safe and affordable housing for seasonal employees, and the quotations included in this study reflect this perception. The vast majority of Central Otago employers embrace this rhetoric, acknowledging their role and responsibility in providing suitable housing for their transient workforce.

Nevertheless, it is essential to observe that the threshold and interpretation of this 'responsibility' varied significantly among employers, as the quotations demonstrate. While some employers emphasised the importance of transparency and clarity in their interactions with seasonal workers, others appeared to have a narrower understanding of their responsibilities.

*It's the growers' responsibility ... but there are a number that don't take responsibility, and see it as merely a numbers game, but they do and should still have a social responsibility. Why should it be the rest of the community's problem? People are worried about the final dollars, not the moral and social responsibility need for the RSE scheme – KI 4*

This suggests a diversity of perspectives among employers regarding the extent of their responsibility in providing suitable accommodation.

*Table 7.1: Employer Perspective of Responsibility*

<i>KI 3</i>	<i>Council has the potential to assist in disincentivizing private developers and landlords strive for the highest dollar.</i>
<i>KI 4</i>	<i>It's the growers' responsibility ... but there are a number that don't take responsibility, and see it as merely a numbers game, but they do and should still have a social responsibility. Why should it be the rest of the community's problem? People are worried about the final dollars, not the moral and social responsibility need for the RSE scheme.</i>
<i>KI 6</i>	<i>We are not selling a dream...and we are very clear of our intentions upfront... but there is a lot of fake promises within this industry.</i>
<i>KI 11</i>	<i>[the local council] are not out to get us they're out to hopefully make our life easier and work with us</i>

KI 12	<i>[For RSE workers] we got to maintain responsibility to them, to their families and our other staff...it's a balancing act.</i>
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The quotes provided in Table 7.1 reveal this divergence in employer perspectives. Interviews with key informants reveal that while some employers prioritise the moral and social responsibility of horticultural and viticultural producers in providing suitable lodging for seasonal workers, others may be more concerned with financial considerations or regard the responsibility as a community-wide obligation. This discrepancy exemplifies the complexity and diversity of the comprehension of what comprises the extent of employer's responsibilities in practice and their perception of their obligations.

### 7.1.3 Local Authorities Perception of Responsibility

Local governments play a crucial role in shaping and influencing the provision of housing for seasonal employees, and their perspectives on responsibility vary. The statements provided by local authorities (Table 7.2) in the research cast light on their disparate perspectives, highlighting various considerations and approaches to this issue.

*Table 7.2: Local Authorities Perception of Responsibility*

KI 9	<i>I think it's the business owner's responsibility to provide it. But I think from a council point of view, we need to make sure that our policy and regulatory settings are the right size so that we enable that development to happen as easily as possible with them, what those wider community desires and values are.</i>
KI 10	<i>I think in terms of responsibility, principle, it could be either. That would be down to the politics of the day.</i>

One viewpoint expressed by a local authority stakeholder (KI 10) suggests that business owners or other entities could be responsible for providing housing for seasonal workers. This perspective recognises the potential for designating responsibility to be flexible, signifying that it may hinge on the prevalent political context or particular circumstances.

Another local authority stakeholder (KI 9) stated that it is the employer's obligation to provide housing for seasonal employees. However, they also acknowledge the council's responsibility to ensure that policy and regulatory settings are conducive to the development of suitable housing options. This viewpoint acknowledges the necessity of coordination between the business community and local authorities in order to align with the desires and values of the larger community.

It highlights the need for additional research and dialogue to establish clearer guidelines and expectations regarding the responsibilities of employers in providing or assisting with safe, affordable accommodation for seasonal workers. Such discussions can assist in addressing varying viewpoints and promoting a more coherent and equitable approach to meeting the housing requirements of seasonal workers in the region.

These perspectives from local government emphasise the importance of striking a balance between the responsibility of employers and the role of local authorities in influencing the provision of housing in the district. It also draws attention to the need for collaboration and cooperation between stakeholders in order to establish policies, regulations, and infrastructure that address the accommodation requirements of seasonal workers while taking into account the broader community's interests and aspirations.

#### **7.1.4 Accommodation Providers Perception of Responsibility**

The perspectives of accommodation providers are essential to comprehending the dynamics and factors associated with seasonal worker housing. Table 7.3 illustrates some of the responses pertaining to where the responsibility lies in the provision of seasonal workers accommodation.



*Table 7.3: Accommodation Providers' Perception of Responsibility*

<i>Quote Exert</i>	<i>Location</i>
KI 14	<i>It should be a joint situation [between employer and work] I don't think you can ask someone who's here for such a short time to invest in intense effort for accommodation. Growers live here, they know the infrastructure... they should contribute as well.</i>

KI 14 contends for a collaborative effort between employers and workers, recognising the difficulties confronted by transitory employees with a short-term stay and limited ability to invest in finding appropriate housing. They propose that producers, who are familiar with the local infrastructure, contribute to the provision of suitable accommodation options. This viewpoint from KI 14 emphasises collaboration and shared responsibility among employers, workers, and producers, highlighting the significance of collective efforts in accommodating the requirements of impermanent workers.

In contrast, KI 13 queries the role of the local council in facilitating employees who choose the cheapest housing and then complain about its quality. This viewpoint suggests that the responsibility lies more with the individual decisions made by workers and queries the efficacy of local council intervention in ensuring adequate housing standards. KI 13 noted the potential negative impact of worker dissatisfaction on the impermanent workforce by expressing concern that such circumstances may discourage workers from returning. These findings highlight the significance of finding common ground and devising effective strategies to address seasonal worker accommodation considering these diverse perspectives.

### **7.1.5 Conclusion**

This study's findings cast light on the various perspectives and understandings of stakeholders regarding the obligation to provide affordable and accessible housing for seasonal workers.

The research reveals that employers, local governments, and housing providers have diverse perspectives, highlighting the complexity of the issue. These findings highlight the need for collaborative discussions and shared responsibility among all parties involved to ensure that seasonal workers have access to suitable and sustainable accommodation options. This collaboration is essential for identifying sustainable solutions to the unique challenges encountered by seasonal employees and ensuring that accommodation options meet required standards, thereby promoting a positive working environment and enhancing worker contentment and retention.

## 7.2 Demand for On-site and Off-Site Seasonal Worker Accommodation

In this research, the location of seasonal workers' accommodation holds significant importance. It is crucial to consider its proximity to orchards and its impact on the overall economy. When devising a long-term solution that benefits employers, employees, and the wider community both socially and economically, the relationship between the accommodation and its connection to the orchards is a key factor. Employers emphasize the value of providing a positive employee accommodation experience as it contributes to building a favourable reputation for their business, and in turn retaining staff for the entire season. In some cases, employees return for consecutive seasons. Given the scarcity of employees during peak seasons, creating an appealing accommodation option becomes essential for attracting and retaining workers.

### 7.2.1 Preferences for on-site and off-site accommodation

Seasonal employers were asked if they would rather have on-site or off-site accommodation (in relation to the site being the orchard). Table X illustrates those who preferred on-site accommodation, and those who preferred off-site accommodation were highlighted in Table 7.4. Survey responses relevant to the location of accommodation have also been included in both tables.

Table 7.4: Participants that were in Favour of On-site Accommodation

KI 11	<i>“On site, because your workforce is there and it's weather dependent. It can rain on and off. You know, there's no traveling around”.</i>
KI 5	<ul style="list-style-type: none"> <li>• <i>“It is great to have them on site – such as our Vanu boys that we had. Then we can keep an eye on them. Offsite comes with potential issues – behavioral issues”</i></li> <li>• <i>“The Vanu boys are generally pretty good. We have a tight contract with them. If they step out of line, they know they are getting sent home”</i></li> </ul>
KI 7	<i>“Accommodation is better in the orchard rather than in Roxburgh. It is not far to get to town. We have the space and the activities for them to not live close to town. They love being on the orchard, it is part of their rural experience”.</i>
KI 12	<i>“By bringing all of our staff on site. Give them heaps to do after work such as providing activities and we can keep them relatively isolated from that” .</i>
KI 4	<i>“Definitely on site, because I can manage them, then they turn up to work every day, they're not on the booze at night. As soon as I have any issues over my campground, it gets back to me so quick”.</i>
Survey Participant 3	<i>“When I was working, I would drive 15 minutes to get to work then after an hour it would rain, and I would have to either wait for it to stop or drive all the way home. I spent way too much on petrol”.</i>

Table 7.4 illustrates that some seasonal employers prefer to have seasonal worker accommodation on-site. Employer responses highlighted the reasons why on-site

accommodation might be preferred, including managing ‘bad’ behaviour that may arise on-site, uncertainty in weather which means employers have flexibility in calling off work, and starting again throughout the day without requiring extra travel to and from the orchard for employees. Responses from the survey highlighted that the uncertainty about weather and shift times meant that off-site accommodation caused increased expenditure on petrol and unpaid travel time for employees. Overall, interviews with seasonal employers identified on-site accommodation as a favourable option from their perspective.

However, several key informants expressed support for off-site accommodation and the benefits this type of accommodation might provide.

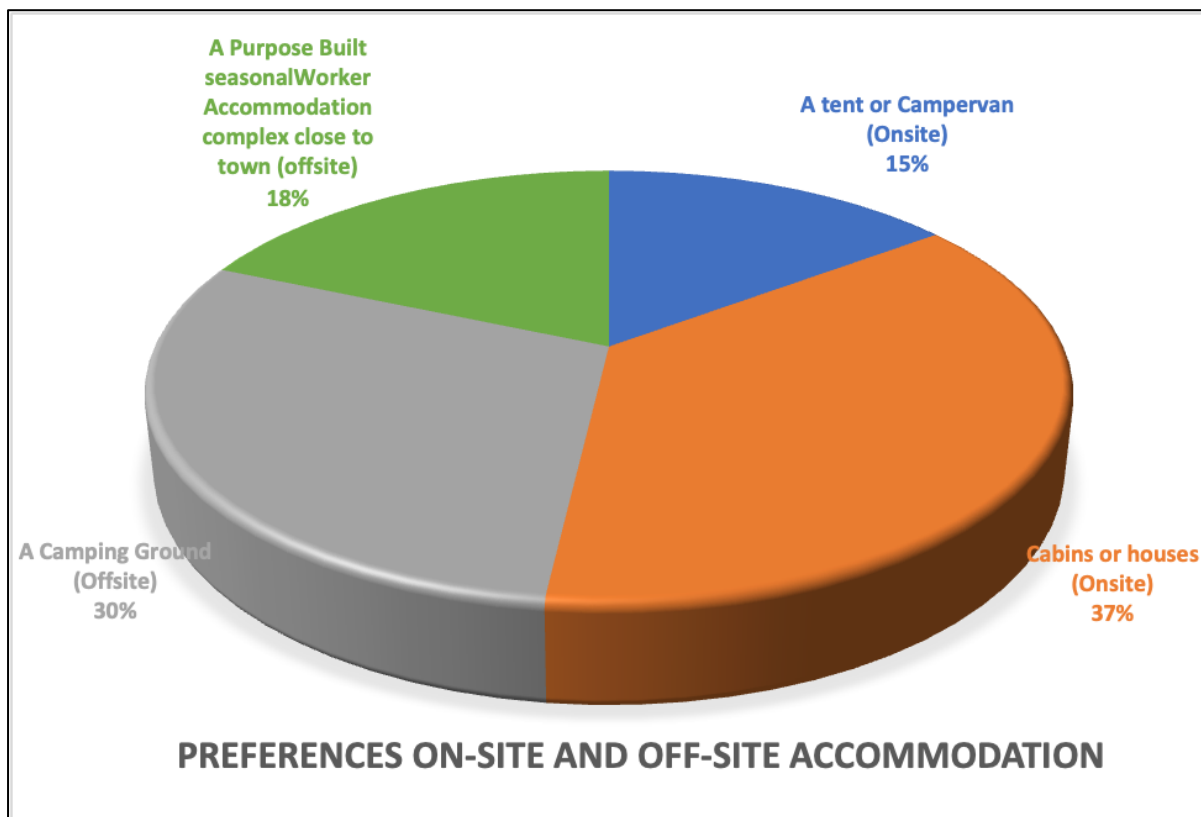
*Table 7.5: Participants that were in Favour of Off-site Accommodation.*

K 9	<i>“I look at Roxburgh and Miller flat, and if you have the right size accommodation located close to town, then it would help improve the vibrancy of the community and attract people as they could easily get into town”.</i>
K 6	<ul style="list-style-type: none"> <li>• <i>“They just want to get away for the day or the night, sleep down at the freedom camping spot to be with other people, because we are only a small orchard too”.</i></li> <li>• <i>“It can be quite a lonely thing but you're not networking as much as they want, we have them staying at other place”.</i></li> <li>• <i>“We might have three rooms spare, but they're happy to stay in their van and I understand because it is their spot, it's their space, it's their gear”.</i></li> </ul>
Survey Participant 1	<i>“staying on orchard will save your time of traveling to work but it's really different to have a relaxing area while you're off. Staying in residential area will make you feel you're actually going 'Home'”.</i>

Survey Participant 2	<p><i>“We had to stay in a shared property with six people we didn’t know. The place was expensive for what we got and ate into a lot of the money we made whilst picking”.</i></p>
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Table 7.5 draws attention to the beneficial aspects of having accommodation off-site. Some respondents noted the autonomy it gives employees by separating their “work” time and “home” time. Other respondents highlighted that having accommodation closer to townships might add some vibrancy to the community. The survey identified respondents' preferences for on-site and off-site accommodation. The most popular accommodation option among respondents was a cabin or house, closely followed by renting a private house or room. 48% of respondents stated they would prefer offsite accommodation and 52% preferred onsite, as illustrated in Figure 7.1.

18% of respondents (Figure 7.1) chose a multi-use complex as their accommodation preference. One possible reason for the low preference expressed in the interviews could be the limited availability of multi-purpose accommodation facilities in Central Otago. If such facilities are not readily accessible to seasonal workers, they may not consider them as a viable option. Additionally, the specific needs and preferences of seasonal workers may vary. The interviews may have provided a platform for participants to express their individual preferences, which might have differed from the overall survey response. Other factors, such as personal circumstances or previous experiences, could have influenced their opinions during the interviews.



*Figure 7.1: The Preferences On-site and Off-site Accommodation for Employees from the Survey Results*

Figure 7.1 shows that cabins are currently a common option for seasonal worker accommodation. 37% of survey participants revealed that they had been accommodated in on-site cabins, with only onsite vans or caravans being a more popular choice. In terms of an actual built structure as an accommodation option, onsite cabins were the most popular option. The participants that voted for onsite cabins as their accommodation were from a range of different localities in the Central Otago region, ranging from Cromwell to Alexandra and Roxburgh.

The prevalence of seasonal workers using vehicles as their accommodation was also identified in interviews with key informants. Freedom camping in the district was highlighted as an issue worth addressing in respect to seasonal workers accommodation, as shown in table 7.6 below.

*Table 7.6: Key Informants' Perspectives of Freedom Camping*

<p><i>KI 7</i></p>	<p><i>“Nothing has been done about campsites. We lost our camping ground in Roxburgh, and I can’t see that ever coming back.”</i></p> <p><i>“I think if we had a camping ground as we used to in Roxburgh, that would be great”</i></p>
<p><i>KI 6</i></p>	<p><i>“About every side street between Clyde or Alex or Cromwell, there's someone parked out there, literally on the side of the road”</i></p> <p><i>“My argument is that the orchard is going to sit there and say well, we offer them accommodation, but we're going to charge them for it, but they rather have free, that's fine but why not work with them in the end and say okay”</i></p>
<p><i>KI</i></p>	<p><i>“Issues were around freedom camping around the lake. But that can be hard, in terms of being able to tell who a seasonal worker is and who is a backpacker/traveler”</i></p>

Survey respondents were also asked to identify their top priority relevant to seasonal accommodation. Physical safety and free/cheap accommodation were the most popular priorities, however being close to their work site was also popular among respondents. Transportation provided by the employer was the least popular consideration. Overall, the rankings were similar, and it is expected that all factors are taken into consideration in choosing a seasonal accommodation option.

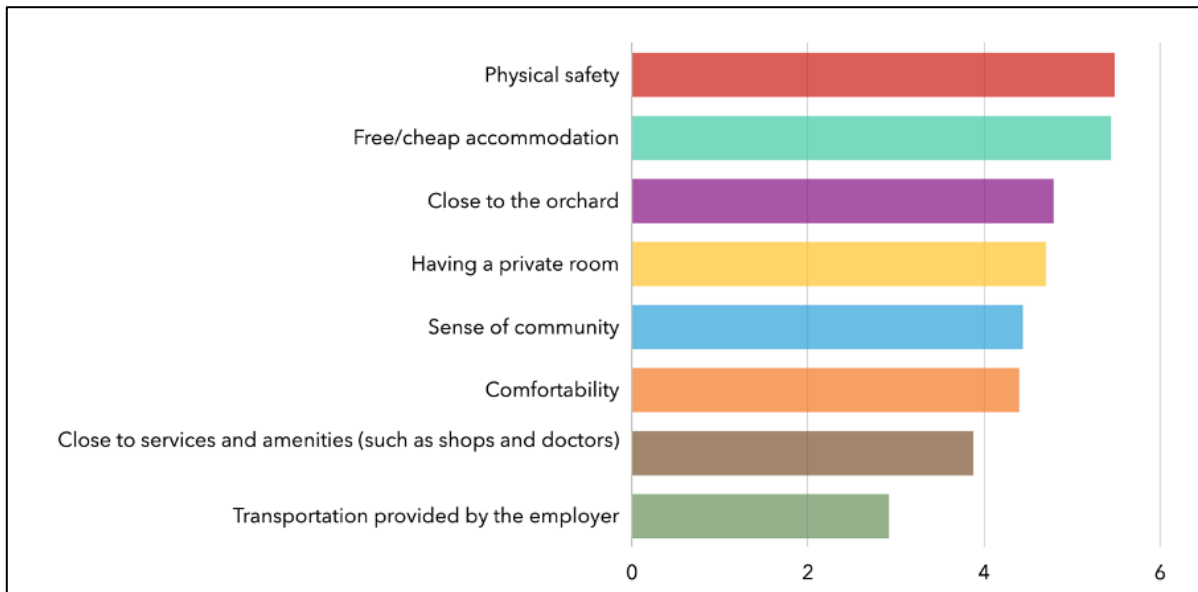


Figure 7.2: The survey results for preferences of social, economic, and environmental factors that influenced on-site, and off-site accommodation preference shown in Figure 7. 1.

### 7.2.2 Varying preferences of accommodation purpose

The contrast between employee preferences for on-site and off-site employee preferences brought attention to Informant 6 and 11's argument that the industry was generalising all seasonal workers accommodation requirements and preferences. Informant 6 reiterated that the intentions of RSE workers is to bring money back to their families overseas, whereas for tourists, having that extra freedom is important as there is a need to travel and experience the country. "They just want to get away for the day or night" highlighted Informant 6. Informant 11 also added that students and long-term mature workers also required different needs. In the survey results, one respondent outlined their preference for off-site accommodation stating; "staying in orchard will save your time of traveling to work but it's really different to have a relaxing area while you're off", whereas a long-term worker preferred on-site accommodation highlighting that it resulted in "less petrol" which resulted in them "Rethinking to go and buy stuff". Overall, the factors that can influence on-site and off-site accommodation, seen in Figure X, can be 'weighed up differently' in terms of the 'want' to explore Central Otago and the 'needs' to save and make money.



### ***7.2.3 Impacts of Location and size of orchard on accommodation preferences***

There is a large difference between the key areas of study within Central Otago: Alexandra, Roxburgh, and Cromwell. Alexandra and Cromwell have a population size of approximately 5,500 people for each area, compared to Roxburgh which has just 588 people (2020). Cromwell and Alexandra also have a variety of hospitality businesses and recreational activities within the township, in comparison to Roxburgh which is geographically further away from key tourism activities than Cromwell and Alexandra, as well as having a single main street for most hospitality and retail businesses.

Due to the small size of Roxburgh, Informant 7 highlighted that *“accommodation is better in the orchard rather than in Roxburgh ... it is not far to get to town ... we have the space and the activities for them to not live close to town”*. This difference in place is also evident in the employee surveys where 83% of workers in Roxburgh said that their preferred on-site accommodation compared to 43% of workers in Cromwell and 50% of workers in Alexandra. Informant 9 also highlighted that *“there is a different sort of cultures between the growers [in different areas]. Teviot valley is generally more of a family-owned business on a smaller scale compared to Alexandra and Cromwell [which] may have relied more on contractors to do the work differently”*. Overall, the preference for either on-site and off-site accommodation is likely to be impacted by the location of the orchard, because of the activities and amenities available in the area.

### **7.2.4 Conclusion**

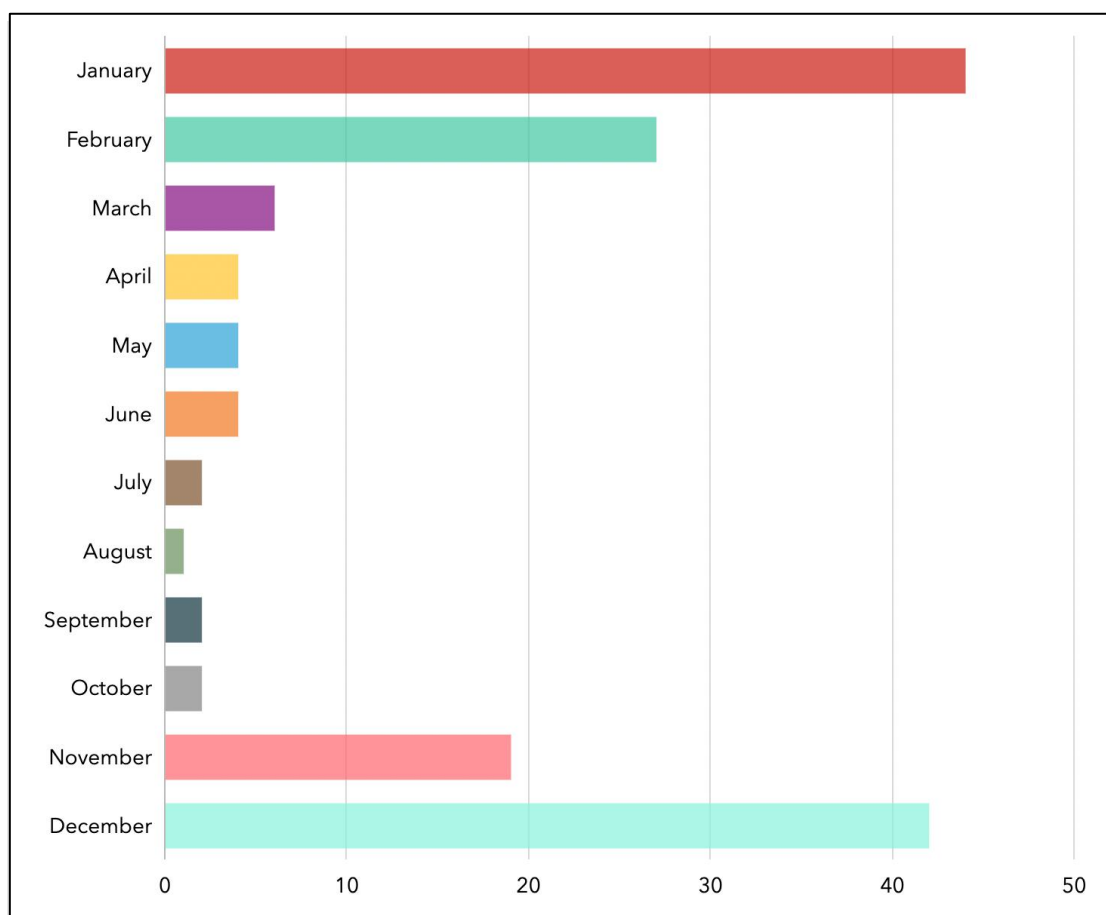
Overall, the findings on different perspectives and experiences of offsite accommodation highlight the issue of generalising the needs of workers into one perspective as well as the centre that there are closest to. The study reveals that workers' accommodation requirements can vary significantly based on individual preferences. The proximity of accommodation centres to worksites emerges as a critical factor affecting worker convenience and overall efficiency. Workers situated closer to their workplaces tend to experience reduced commuting times and expenses, which can positively impact their productivity and well-being.

## 7.3 Viability of Multi-use Accommodation

This section presents the interview and survey results relevant to the current and future viability of implementing multi-use accommodation in the Central Otago District. Multi-use accommodation refers to a type of facility or property that is designed to serve multiple purposes or accommodate various activities, across a range of different industries.

### **7.3.1 Peak horticulture season regarding the viability of multi-use accommodation**

The potential for the use of multi-use accommodation is evident in Central Otago, as the peak horticultural period which requires the most workers is short. This condensed period of demand brought about by the short peak period often leaves accommodation unused for lengthy periods of the year. Results from the survey reiterated the short nature of the peak demand period for seasonal workers accommodation within the Central Otago Region illustrated in Figure 7.3. This indicates the months that survey participants worked in the Central Otago district horticultural industry.



*Figure 7.3. Months of the year that survey participants worked in the Central Otago horticultural industry.*

It is evident from Figure 7.3 that the months of December and January, and to a lesser degree November and February, are the peak months where seasonal workers relocate to Central Otago and require short-term accommodation. Based on this, accommodation built for seasonal workers tends to only get occupied during this short period and is often left vacant during the remaining 8 months of the year. This offers the potential for multi-use accommodation that can be utilized for a range of different employees throughout those months, through collaboration between industries in the Central Otago district, as well as collaborating further with industries located in the Queenstown Lakes District.

The interviews with orchard owners suggest that accommodation that can be used for different activities throughout multiple industries is already utilized as part of seasonal worker accommodation. This type of accommodation, while allowing for use over multiple industries,

also avoids the issue of being left vacant for prolonged periods. During the interviews with orchard owners and accommodation providers, questions were asked regarding the current suitability and uses of multi-use accommodation in Central Otago as shown in Table 7.7. The most prevalent type of multi-use accommodation utilized by orchard owners were relocatable cabins, which in most cases were leased by orchards during peak demand periods.

*Table 7.7. Responses from orchards and accommodation providers on their utilisation of multi-use accommodation.*

KI 5	<i>“There are several cabin companies who lease mobile cabins out particularly during cherry season for a few months at a time. The same cabins are commonly used on construction sites”</i>
KI 7	<i>“We use relocatable cabins during summer, but there is a reluctance for cabin providers to invest because they are only short-term rentals. There are uncertainties about renting cabins for such short terms, they would rather long-term certainty.”</i>
KI 8	<ul style="list-style-type: none"> <li>• <i>“From our point of view, when we ran out of accommodation, they bought cabins that they could rent on a short-term basis, and house the staff in those cabins”</i></li> <li>• <i>“From the cabin owners' point of view, 5 or 6 years ago they were just renting them out for 2 months at a time, they have since changed their stance and rent them out for 6 months at a time.”</i></li> </ul>
KI 11	<ul style="list-style-type: none"> <li>• <i>“We have typically leased cabins for short periods of the year, and this has worked, but we have had challenges trying to find them after COVID as schools and medical centers have required them... they are becoming a hot commodity”</i></li> </ul>

	<ul style="list-style-type: none"> <li>• <i>“Movable cabins are one of the best options as they don’t require much consenting, once you start to build something, that comes with many added costs”</i></li> </ul>
KI 12	<ul style="list-style-type: none"> <li>• <i>“Workers prefer to reside on the orchards, so relocatable cabins fill that gap.”</i></li> <li>• <i>“We’ve had the odd few here (relocatable cabins), and we utilize them during the summer months”</i></li> </ul>

Table 7.7 demonstrates that relocatable or portable cabins seem to be the most favorable form of a multi-use facility utilized for accommodation. Most orchards who were interviewed currently lease or have once leased relocatable cabins for certain periods of the year, for the use of accommodation for their workers. The mobile nature of such accommodation also means that there was little variation in responses from different localities in Central Otago, as these cabins can be transported throughout the region. Informants from Table 7.7 also state that they typically only use relocatable cabins during summer, during the peak demand for workers. One challenge that many employers foresee however, is that cabin companies are reluctant to hire out cabins for such short time periods. As informant 7 and 8 highlighted, cabin providers would rather have more certainty and assurance by hiring their facilities out for longer periods of the year, preferably for a minimum of 6 months at a time, opposed to the 2 or 3 months when horticultural businesses typically require them.

### **7.3.2 Future implementation of multi-use accommodation**

A range of orchard owners, accommodation providers, as well as CODC members were also asked their thoughts on the potential future direction of seasonal worker and multi-use

accommodation. Many informants agreed that the collaboration between multiple industries to provide accommodation for a range of different activities may be a partial solution to meeting the demand for seasonal accommodation. Table 7.8 below highlights some of the most relevant responses about the viability of multi-use accommodation.

*Table 7.8. Responses from orchards, accommodation providers, and CODC members on the future of multi-use accommodation for seasonal workers.*

KI 6	<ul style="list-style-type: none"> <li>• <i>“It's a huge investment for six weeks of the year... because at the end of the day, what they are frightened of is they're going to be left with the cost of something they're not going to use”</i></li> <li>• <i>“Now whether that means that they set up a multi complex some way or say in Cromwell and all the orchards have a part of it which is I think is the best option to do”</i></li> <li>• <i>“If you do a complex, it will be in Cromwell, so you can also tap the vineyard and ski field. People travelled frequently from Cromwell.”</i></li> </ul>
KI 8	<p><i>“With regard to shared facilities, the cherry season is from December through to February, the vineyard season tends to be from March till May, and then winter people come in from June till January. There is an opportunity to sort something out to accommodate everyone's needs while still using these cabins.”</i></p>
KI 9 - CODC staff	<p><i>“Multi-use spaces could work, but we can't invest in them, as we have to prioritise accommodation issues within our residents and ratepayers”</i></p>
KI 10- CODC staff	<p><i>“We have quite a high level of tourism, so one thing that's come up frequently is using seasonal worker accommodation for travelers’</i></p>

	<i>accommodation; so, putting them up on 'Airbnb' or 'booking.com' and having them available for visitors to use."</i>
KI 11	<i>"We really need to work industry wide, not just summer fruit industries but fruit and vege, and even wider, to make providing larger scale accommodation viable."</i>
KI 12	<ul style="list-style-type: none"> <li>• <i>"In terms of collaborating with other industries, tourism would be where you have to go to justify the expense. You have to keep accommodation reasonably cheap for workers, so tourism may help cover some of the workers expenses during their peak season."</i></li> <li>• <i>"You're going to need to look for third party investment, because I'm not interested in managing anyone else but my staff. This introduces different levels of complexity in terms of management."</i></li> <li>• <i>"If we could book a third-party accommodation provider, I would jump on it. If we go down the track of building purpose-built facility, then we need to talk industry wide."</i></li> </ul>

Responses shown in Table 7.8 suggest that multi-use forms of accommodation seem to be the preferred option looking into the future. There is an agreement amongst interviewees that some form of collaboration and cooperation between industries is required. Tourism appears to be the most favorable option when it comes to collaborating with industries outside of horticulture, as informants 10 and 12 suggest that the Central Otago district has a high level of tourism, therefore is the sector that could justify the expense of shared industry accommodation. This is based on the fact that seasonal workers aren't likely to pay large amounts for accommodation while in the district, hence the need for tourism to help cover the cost of keeping accommodation running. Other informants suggest that the agricultural sector has enough work throughout the year to keep partnerships within the industry. This is supported by informants

8 and 11, who propose that between horticulture, viticulture, and winter ‘fruit and vege’ industries, there should be enough work to create opportunities in terms of accommodation that can meet everyone's needs. Informants 10 and 12 also highlighted some of the key challenges that may arise with multi-use accommodation. These key challenges would include the cost and management of such multi-use facilities.

### **7.3.3 Conclusion**

Overall, the interview results suggest that multi-use accommodation in the form of relocatable cabins are already a popular option for orchards and accommodation providers to supply for workers. CODC members, orchards, and accommodation providers agree that further collaboration between the horticultural, agricultural, and potentially the tourism industry is needed to strengthen the prospect of a permanent multi-use facility.

## **7.4 Policy and Infrastructure Implications for Seasonal Workers Accommodation**

Interviews with Key Informants highlighted several concerns regarding housing standards and infrastructure. This section will present the interview and survey findings relevant to the provision of housing, housing standards and infrastructure. Additionally, the policy and regulations outlined in the Central Otago District Plan will be incorporated into this section, informed by the interview and survey results.

### **7.4.1 Inadequate Supply of Seasonal Worker Accommodation**

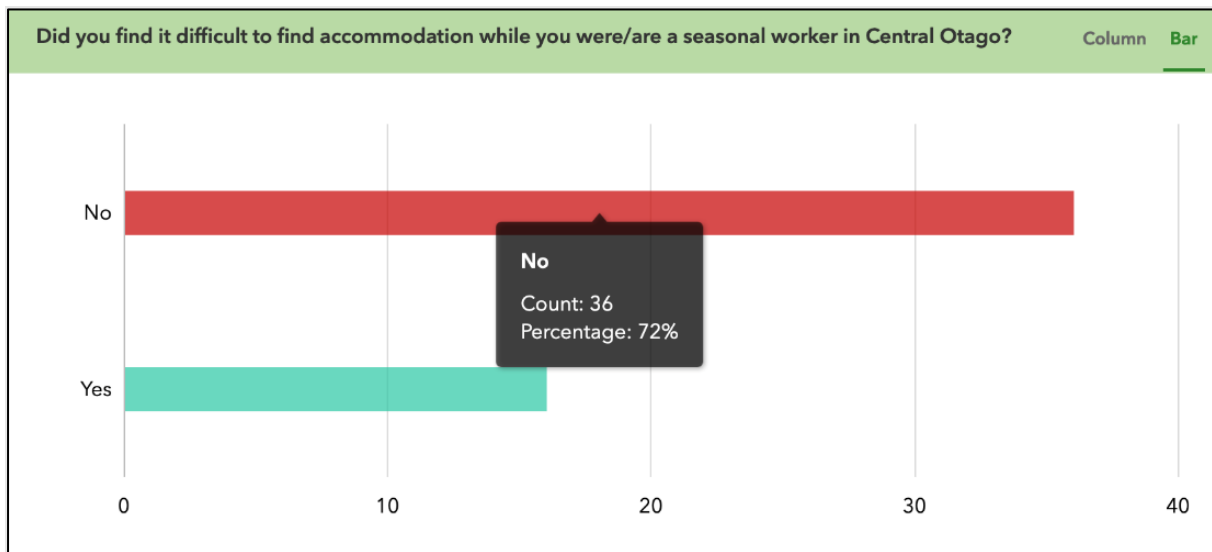
The issue of finding suitable accommodation for seasonal workers is important due to its impact on both the seasonal workers and the employers operating in Central Otago. The major finding from the semi-structured interviews indicates that 50% of the interviewees acknowledged the existence of a shortage in seasonal worker accommodation (Table 7.9). This issue has been a long-standing concern shared by various respondents, including accommodation providers, horticulture/viticulture owners, and the local authority. The responses provided by these stakeholders further reinforce this finding, as illustrated in Table 7.9 below.



Table 7.9 Key responses to Seasonal Worker Accommodation Shortages

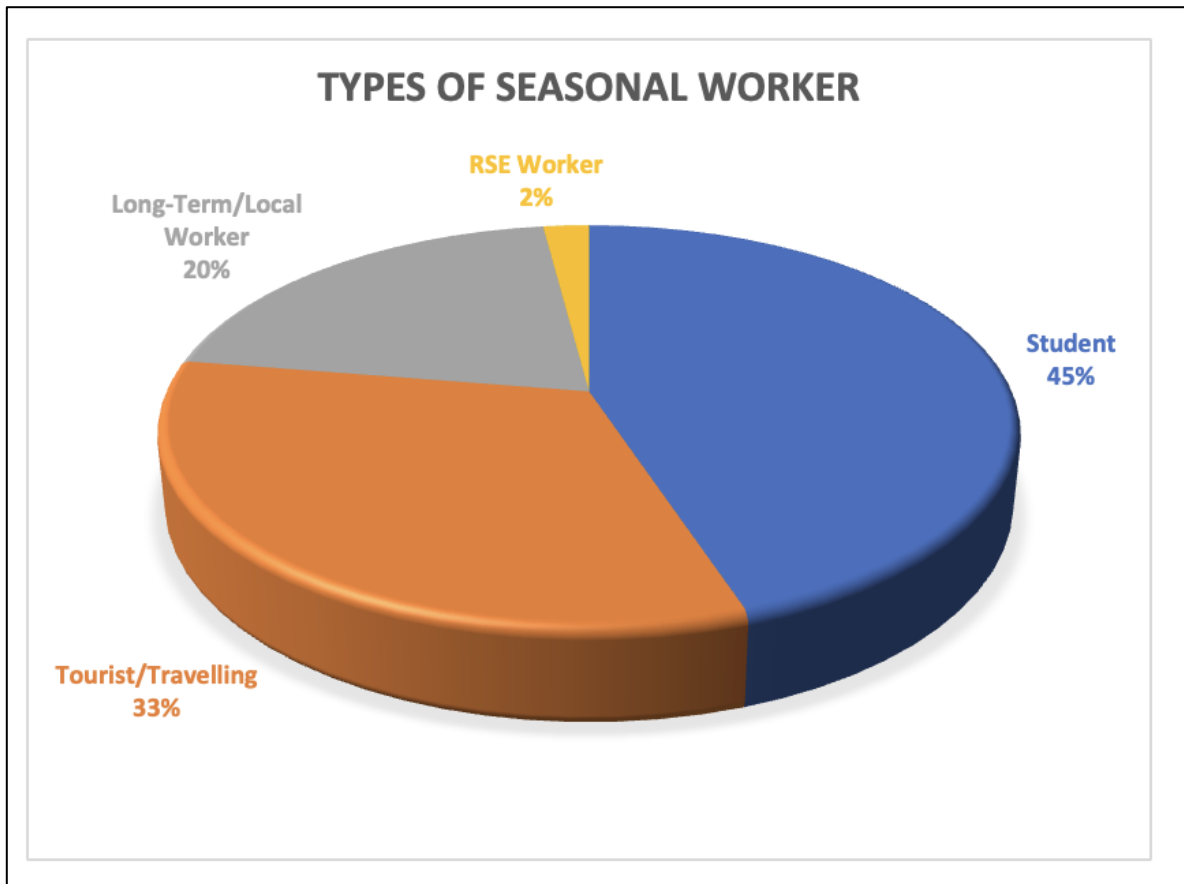
KI 2	<i>“Lacking. It has been a problem for many years, it is particularly difficult in the summer period for the orchard workers. Part of the issue is that Central Otago has over 5, 000 workers come into the district for summer season, and there are not 5, 000 spare rooms”.</i>
KI 5	<i>“Yes, there is accommodation issues in Ettrick and Roxburgh.”</i>
KI 9	<i>“Accommodation is an issue across our community.”</i>
KI 10	<i>“Because workers' accommodation tends to be heavily focused in the summer, they are facing the same accommodation issues as everybody else is.”</i>
KI 11	<i>“It was more of a student workforce that needs accommodation.”</i>
KI 12	<i>“The standard and demand for accommodation is certainly increasing.”</i>
KI 14	<i>“Absolutely. There is a massive shortage during the cherry season. I would say that Central Otago has probably hundreds of beds short for that eight-week cherry season.”</i>

However, upon reviewing the above information, it becomes apparent that the interviews presented a distinct perspective in comparison to the survey results. Among the survey respondents, 36 out of 50 individuals, accounting for a percentage of 72%, reported no difficulties in finding accommodation (Figure 7.4).



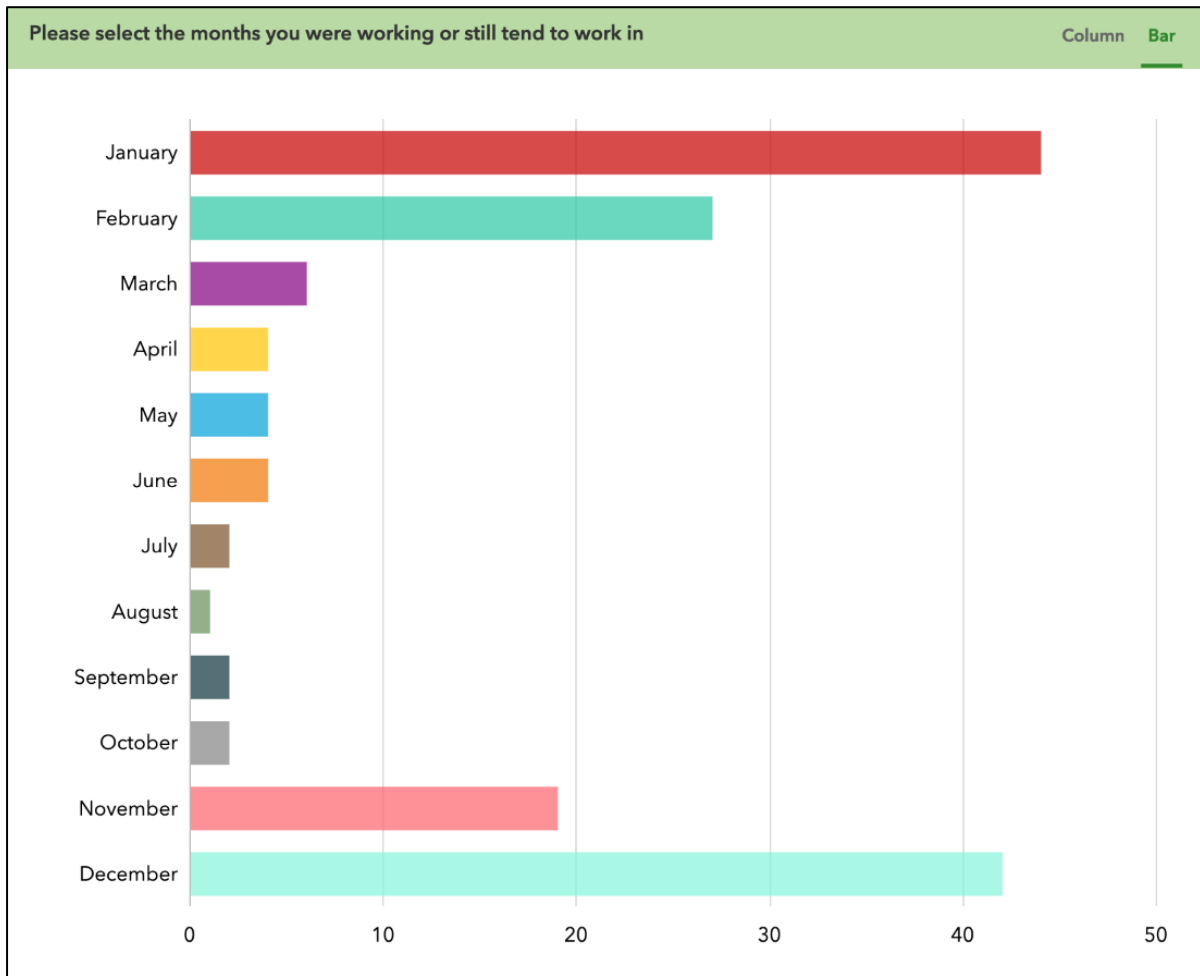
*Figure 7.4 Difficulty in Finding Seasonal Worker Accommodation in Central Otago: Survey Respondents Perception*

The outcome of the survey was unexpected, considering that the shortage of worker accommodation was a major concern for employers. The analysis of the survey's findings can be attributed to several factors that influenced the results. Firstly, a significant majority of the survey respondents (45%) consisted of students who were involved in seasonal work for a limited duration, as depicted in Figure 7.6.



*Figure 7.6 Types of Seasonal Worker: Survey Respondents*

Secondly, it is worth considering that these student workers may only be available to work during their semester break, which typically falls between November and February. This aligns with the high peak work season illustrated in Figure 7.5.



*Figure 7.5 Months that survey respondents work/worked in Central Otago as a seasonal employee*

Lastly, it is probable that these students might lack awareness regarding the inadequate availability of seasonal worker accommodation, as they may have made alternative arrangements such as staying temporarily with their parents or friends or utilising their own vehicles as a form of accommodation, as indicated in Table 7.9.

Table 7.9 Survey Responses on Alternative Accommodation Arrangements

Survey Participant 27	<i>“I am fortunate enough to live in Alexandra (my hometown close to plenty of Orchards.”</i>
Survey Participant 33	<i>“Stayed at friends.”</i>
Survey Participant 35	<i>“Everything was so expensive, so I was lucky to have a family friend who lived there.”</i>

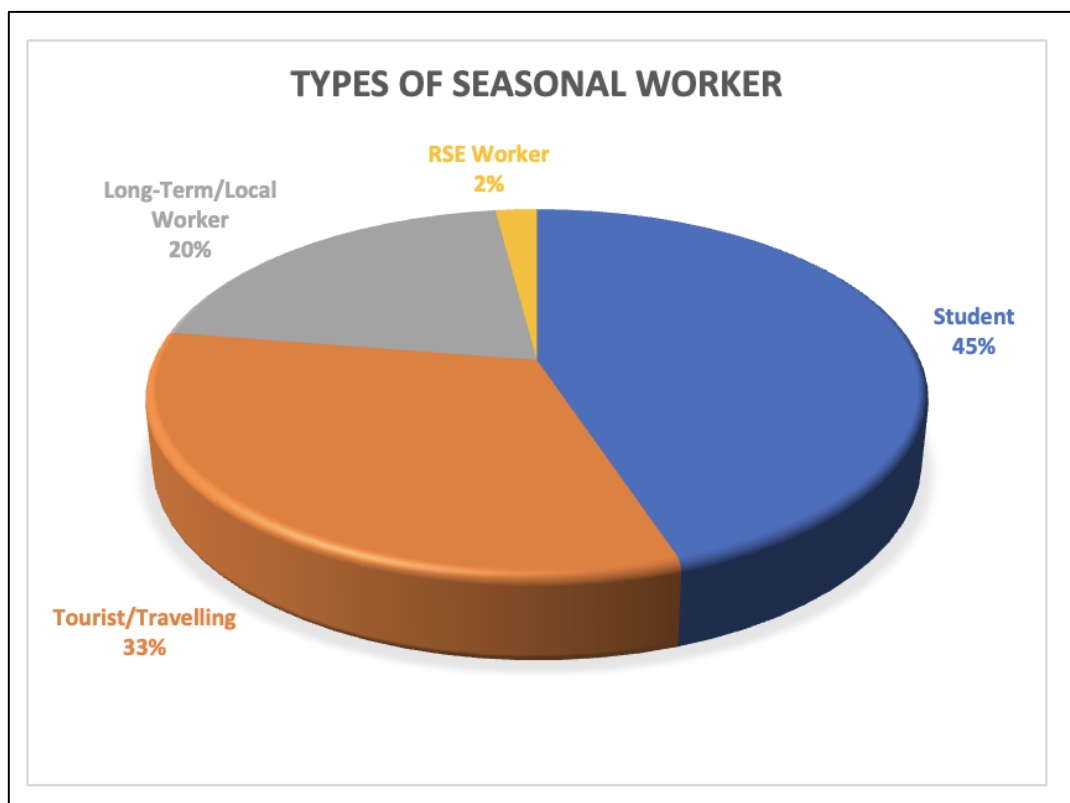
The majority of survey respondents, who are students, can be linked to the unanimous statements of three interviewees and one survey participant, highlighting that a significant portion of their seasonal workforce consists of students, as depicted in Table 7.10.

Table 7.10 Statements on Students as a Major Seasonal Workforce

KI 11	<i>“During harvest, we have 60 workers, it is made up of 8 RSE team, full timers, local students (you could have half a dozen). Students that come and work here that are not local.”</i>
KI 12	<i>“We have 12 RSE (Recognised Seasonal Employer) staff and the rest are made up by 80% to 60% students. High school students are only available for a six-week window, and university 8-10 weeks (about 2 and a half months)”.</i>
KI3	<i>“We provide accommodation for our staff over the Christmas. It is short season, only four weeks so we hire students for less than 50 days”.</i>

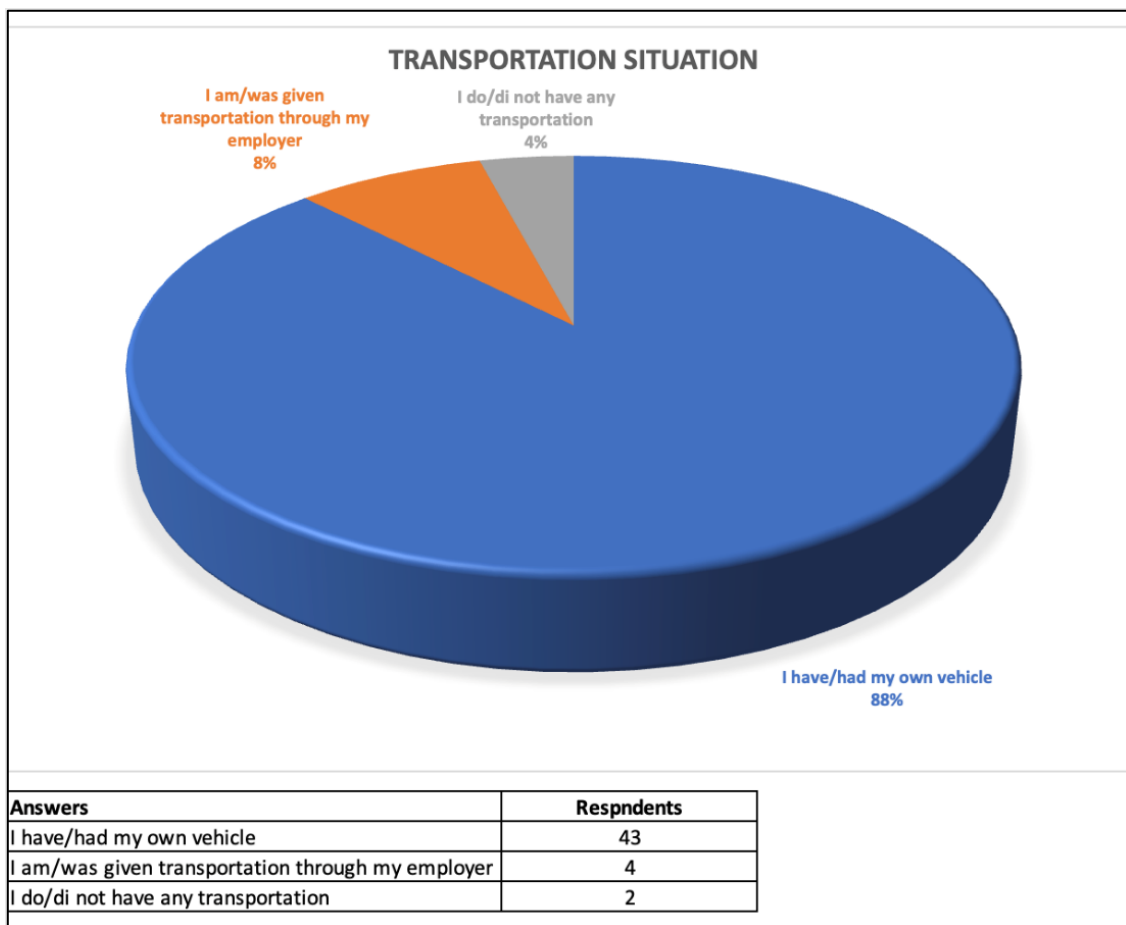
Survey Participant 20	<p><i>“Many students from University (living in Alexandra or Clyde) and from Dunstan High School tend to work on orchards over the summer.”</i></p>
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Another factor contributing to the relatively low percentage in the survey regarding the perceived difficulty in finding seasonal worker accommodation is the significant presence of respondents classified as tourists/travelers, comprising 33% of the total respondents, equivalent to 16 out of 50 respondents, as shown in Figure 7.6. It is plausible that these individuals did not encounter challenges in securing housing due to their reliance on personal vehicles or vans for temporary accommodation. Their distinct circumstances and alternative housing options may shape their perception differently when compared to employers, accommodation providers, and the Council, who face unique challenges in addressing accommodation issues.



*Figure 7.6 Types of Seasonal Worker: Survey Respondents*

When considering both the student and tourist/traveler respondents together, their total percentage closely aligns with the overall percentage of respondents (78%, or 38 out of 50 respondents) who indicated they had access to their own means of transportation, as illustrated in Figure 7.7. This observation implies that a substantial portion of the respondents have access to personal vehicles, which in many cases serve as a temporary accommodation solution in campsites. This circumstance potentially mitigates their perception of the challenges associated with finding seasonal worker accommodation.



*Figure 7.7 Number of respondents with their own vehicle*

## 7.4.2 Housing Standards and Infrastructure

The discussion surrounding the insufficient availability of seasonal worker accommodation has given rise to additional concerns, including the establishment of housing standards and infrastructure. Several participants expressed the importance of ensuring suitable living conditions for seasonal workers, with a primary focus on the provision of adequate sanitation facilities. A summary of the key responses is presented below (Table 7.11).

*Table 7.11 Comparable Viewpoints on Housing Standards and Infrastructure*

KI 5	<i>“We supply toilets and shower facilities and kitchen stuff.”</i>
KI 12	<i>“We also have pastoral care, like a camp mum, who does the cleaning during the day when everyone is at work.”</i>
KI 1	<i>“People living in a van and doing manual work find it a bit too much not having a cold shower and facilities. This would be a barrier to retaining staff.”</i>
KI 6	<i>“The staff that are here used to come from the backpackers and they would go three weeks without a shower and that is not acceptable as far as I am concerned. And that is what made us open our house up because it has hot water whenever you feel like it. There is a kitchen in the house, there is a toilet.”</i>
KI 4	<i>“They get a lot of stuff because they have clean toilets, showers, laundry, and a kitchen.”</i>

The key responses above highlight the significance of including essential facilities like a kitchen, shower, and toilet when developing accommodations for seasonal workers. For proper functionality, the shower and toilet facilities must be connected to council services or, alternatively, a septic tank system should be constructed on the site where the seasonal



accommodation will be located. This ensures compliance with sanitation regulations and facilitates a hygienic and convenient living environment for the workers.

Having the basic amenities further supported by the feedback provided by survey participant #24, who expressed their satisfaction with working for four consecutive summer seasons at Cromwell. He said that:

*“The orchard I worked at provided both free cabin and free tenting sites. We were provided with showers and toilets along with adequate cooking facilities.”*

However, an unforeseen issue emerged from the interview discussions, centered on the expensive costs associated with installing effluent disposal systems, particularly in areas where council services are unavailable, as commonly observed in rural regions. The effluent disposal system is essential in providing the basic amenities for the seasonal workers.

*According to KI 4:*

*“The septic system and all the underground stuff that you do not see can be quite expensive. You need to apply for a building consent, a septic tank system can cost \$30, 000”.*

This was further affirmed by KI 11:

*“If you're building a cabin that has a kitchen or a toilet, bathroom shower, there is a huge cost there.”*

Building upon the previous KI 11's comments, KI 12 raised a new issue regarding the standard of accommodation:

*“The demand for accommodation is certainly increasing and the standard of accommodation. There is a significant investment to be able to accommodate a certain number of people, even on a campsite, you are probably going to have to throw a couple of \$100,000 to be able to supply a decent standard of accommodation”.*

Considering the high expenses associated with constructing new accommodation to meet building standards, as well as the costs related to infrastructure and maintenance, as emphasized

in the interview responses, one potential solution that was highlighted in Chapter 6 Policy Review, is the establishment of permanent multi-use accommodation. This might offer the opportunity to connect to existing infrastructure if located near residential areas and reduce some of the challenges that arise with infrastructure suitability in the rural resource area.

#### **7.4.3 Policy and Rules within the Central Otago District Plan**

To effectively address challenges related to shortages in seasonal worker accommodations and the provision of adequate housing standards, it may be necessary to amend the rules and policies outlined in the Central Otago District Plan. This adjustment would enable the establishment of purpose-built accommodations or multi-use facility designed specifically to address these issues.

The policy and district plan revision process involves a collaborative approach between the Council and different stakeholders. To ensure that the identified challenges such as limited supply of seasonal worker accommodation are adequately addressed, it is important to evaluate and potentially revise the existing policy framework and district plan rules on seasonal worker accommodation.

KI 14 during the interview stated that:

*“If I was making the rules, I would introduce legislation that said, for every certain number of cherry trees planted, the grower has to provide a certain number of bedrooms”*

The statement above gives perspective regarding existing Council rules and policies related to seasonal worker accommodation. This response highlights the interviewee's belief in linking the provision of seasonal worker accommodation to the horticultural/viticultural activities in Central Otago that could potentially address the accommodation problem.

KI 9 highlighted that addressing the shortages of seasonal accommodation:

*“Needs to be council enabled, so we need to make sure we have the right policy settings.”*

In conjunction with the statement above, Informant 10 was asked for their perspective regarding the potential effectiveness of integrating a permitted activity rule into the existing

seasonal worker accommodation regulations outlined in the Central Otago District Plan. The focus was to assess the potential benefits of incorporating this additional activity, taking into consideration the availability of appropriate infrastructure, such as a sewer and wastewater system.

In response, KI 10 expressed the following viewpoint:

*“If we remove the provision of wastewater and make it a permitted activity there is risk that you will get developments that do not have a good level of water supply or things like that. That is not necessarily a massive thing, but it is important for us to at least be able to require that sort of infrastructure be provided to a certain level.”*

KI 10 suggested further that *“Instead of having it as a permitted activity, you might be better off having a controlled activity”* added to the existing rules for seasonal worker accommodation in the Central Otago District Plan. This suggestion stems from the belief that maintaining a controlled activity status would ensure that relevant information is still required from accommodation providers to demonstrate compliance with necessary standards.

By incorporating perspectives like that of KI 10, authorities may be able to strike a balance between accommodating the seasonal worker needs while ensuring the provision of essential infrastructure and maintaining compliance with standards.

#### **7.4.4 Conclusion**

The broad spectrum of the result analysis provides an overview of interview findings and survey responses on the scarcity of seasonal worker accommodations in Central Otago. The interviews highlighted concerns about housing standards, infrastructure, and the need for multi purpose-built accommodations which will help address the issue on accommodation shortages among seasonal workers.

The importance of infrastructure and compliance with standards was highlighted during the interview process. However, the high costs of installing effluent disposal systems and maintaining accommodations were identified as challenges. An in-depth discussion of

infrastructure and multi-use complexes in relation to policies will be further discussed in the Chapter 8.

## 7.5 Overall Conclusion of Findings

In conclusion, this study's findings highlight the diverse perspectives and understandings of stakeholders regarding the issue of affordable and accessible accommodation for seasonal workers. The research emphasises the complexity of the issue, as employers, local governments, and accommodation providers have divergent perspectives. Clearly, collaborative discussions and shared responsibility among all parties involved are essential for ensuring long-term housing options for seasonal workers. The study emphasises the need for tailored solutions to address the unique challenges encountered by seasonal workers in each area, rather than generalising their requirements from a singular perspective or centre. The findings indicate that multi-use accommodations, such as relocatable cabins, are already favoured by orchards and accommodation providers. Nonetheless, additional collaboration between the horticultural, agricultural, and possibly tourism industries is required to strengthen the likelihood of establishing enduring multi-use facilities. The research analysis provides a comprehensive overview of interview findings and survey responses, highlighting the absence of seasonal worker accommodations in Central Otago. Concerns about housing standards, infrastructure, and the need for purpose-built multi-use accommodations were consistently raised in interviews. Moreover, the interviews revealed the necessity of infrastructure and compliance with standards in addressing the housing shortage. The high costs associated with constructing effluent disposal systems and maintaining accommodation were identified as key challenges. By contemplating these findings and engaging in collaborative efforts, policymakers, employers, and housing providers can work together to surmount the challenges associated with accommodating seasonal workers. Moreover, such action will promote a positive working environment, boost worker satisfaction and retention, and contribute to the success of the seasonal workforce as a whole.

## Chapter 8: Discussion

The purpose of this section is to address the research objectives. It concentrates specifically on seasonal worker accommodations in Central Otago's Cromwell, Roxburgh, and Alexandra, highlighting living conditions and housing accessibility. It contrasts on-site and off-site housing, highlighting their advantages, disadvantages, and prevalence, which is essential for comprehending the seasonal worker housing shortage. The discussion identifies accommodation deficits and infrastructural challenges, proposing solutions tailored to Central Otago's unique context and focusing on both immediate and long-term solutions. Using academic insights and case studies, this chapter provides evidence-based strategies for addressing these shortages, serving as a guide for policymakers to improve living and infrastructure support for this vital workforce.

### 8.1 Locational Analysis of Seasonal Worker Accommodation across Cromwell, Roxburgh, and Alexandra

The viability of providing seasonal workers with accommodation varies across Cromwell, Roxburgh, and Alexandra, primarily due to differences in land-use patterns, spatial dynamics, and temporal factors. A comprehensive locational analysis focusing on secure and affordable housing in Central Otago has revealed significant economic and cultural differences between these areas. Population, geography, amenities, and employment opportunities vary substantially between Roxburgh, Alexandra, and Cromwell (provide context). As a result of these distinctions, each community confronts unique challenges in addressing the lack of seasonal worker accommodation. Clearly, any solution to the seasonal accommodation deficit must address the social and economic precarity of both employers and employees, as well as the broader demands of Central Otago's communities. Through interviews, it became clear that while some solutions and issues pertaining to the seasonal worker accommodation shortage were unique to certain Central Otago centres, others were shared by all centres. The varieties of available housing, as well as on-site and off-site solutions, differed between cities, with their geographic location affecting their capacity to leverage social capital and reduce temporal precarity. Given the demographic and geographical differences between Cromwell, Alexandra,

and Roxburgh, their capacity to provide social resources and opportunities within and beyond their networks is likely to vary. Consequently, their capacity to retain the seasonal population influx may vary.

When it comes to the type of accommodations and its ability to create an economic, environmental, and social benefits for the local and wider Central Otago as well as tourists, interviews and case studies have suggested that ‘multi-complex’ accommodation, transportable/relocatable accommodation, multi-use accommodation and camping grounds could be possible solutions to the accommodation shortage in Central Otago. This chapter will provide a locational analysis of Roxburgh, Cromwell and Alexandra specifically looking at the spatial and temporal limitations of accommodation types and their location in respect to each location.

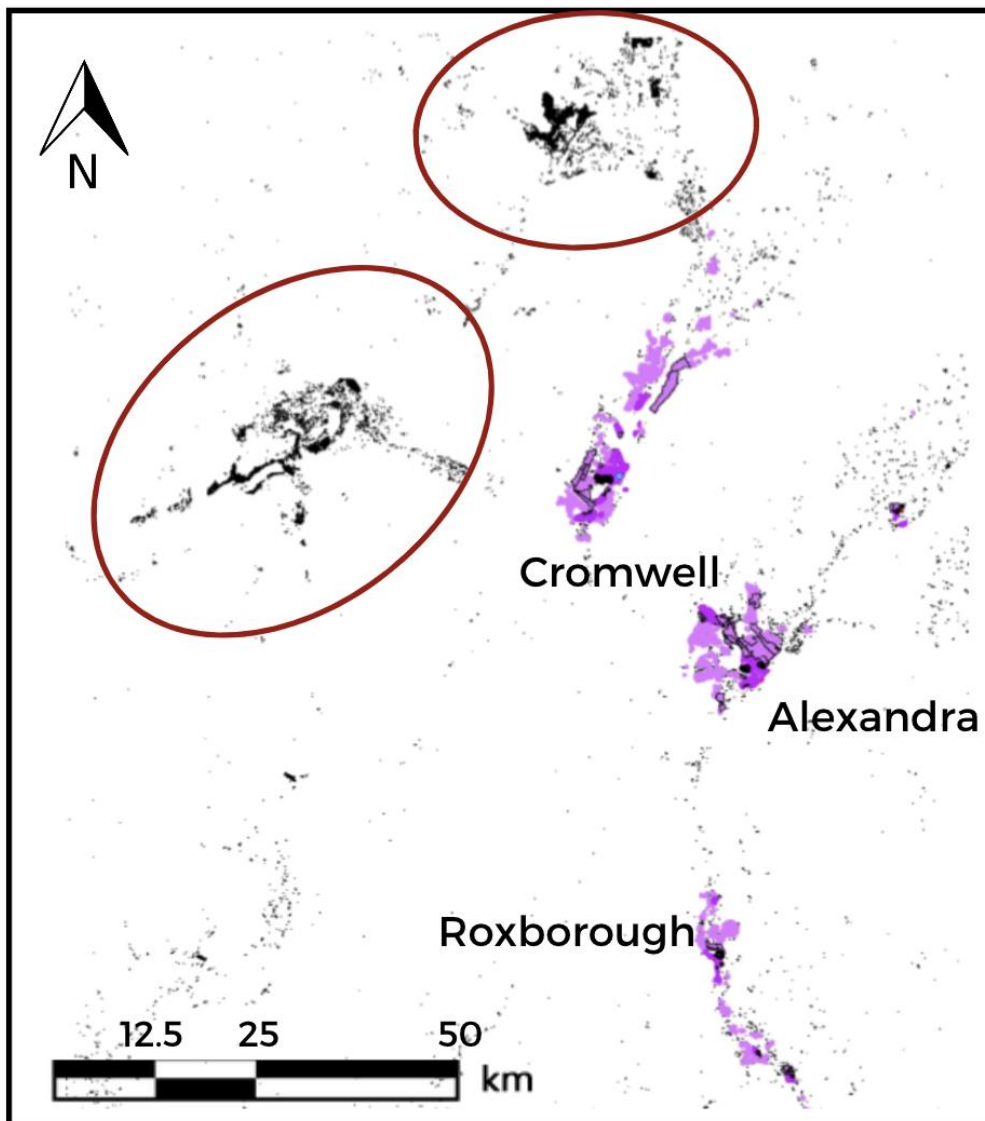
In interviews, employers supported permanent seasonal worker accommodation options such as a multi-use complex. However, some key informants questioned the financial viability of a such accommodation type, particularly the risk that this accommodation would be expensive to maintain if it was fill in the off-peak horticultural season. Informant 6 further reiterates this by stating that *“they [employers] don't invest in this stuff because it's literally for six weeks... because at the end of the day, what they [employers] are frightened of ... they're [employers] going to be left with the cost of something they're not going to use”*. Not only would a lack of demand in the ‘off-peak’ season result in a financial loss for those investing in a permanent solution with a long-term investment such as a multi-use complex, but it would also flow down to the cost for seasonal workers. The lack of accommodation guests in the ‘off-peak’ season would likely increase the cost to those workers staying in the ‘peak’ season.

Interviews with key informants also raised the point that the tourism industry could be a solution to the lack of demand in the ‘off-peak’ season. Informant 10, a CODC member stated that *“we have quite a high level of tourism, so one thing that's come up frequently is using seasonal worker accommodation for travellers' accommodation”*. Employers further reiterated the potential to work with the tourism industry, *“we really need to work industry wide, not just summer fruit industries but fruit and vege [vegetables], and even wider, to make providing larger scale accommodation viable”* (KI 11). Working with other industry demands for accommodation such as the viticulture, the ski tourism industry and general tourism demands

was also encouraged by KI 6, “*why don't they look into the vineyards and then the ski season starts after that*”.

Although most Central Otago townships have peak demand for accommodation during summer because of seasonal workers and tourists in the district, neighbouring towns such as Wanaka and Queenstown tend to have high levels of accommodation demand spread throughout winter due to the ski industry. Although the demand for short-term housing may be evident in one town, such as Queenstown, the ability to create supply within another centre such as Cromwell, Alexandra or Roxburgh could reduce the risk of multi-use complex' being utilised only in the peak horticulture season. It may also provide a viable economic pathway for multiple industries to co-manage or lease a complex.

Key Informant 8, an employer based in Cromwell, stated that after the cherry and vineyard season, “*winter people come in from June till January*” into Cromwell. Cromwell, a centre only 60km from Queenstown, 30km from Wanaka and close to the ski fields could have the capacity to provide accommodation not only to seasonal workers within the peak summer months, but also provide accommodation to winter seasonal workers and tourists looking for affordable accommodation, as seen in Figure 8.1. A multi-use complex built in Cromwell could further alleviate housing shortages for Queenstown Lakes workers by providing an affordable accommodation option.



*Figure 8.1: A map of the wider Otago district including Roxburgh, Alexandra and Cromwell. The black dots indicate building outlines within the area (LINZ, 2023).*

In figure 8.1 the purple concentrations of colour indicate Cromwell, Alexandra and Roxburgh which include CODC resource areas as well as surrounding orchards.

Although other permanent solutions could be offered in Cromwell such as detached dwellings or cabins, a multi-use complex could be a long-term solution that provides for a range of industries accommodation demand. A multi-use complex has a higher density capacity, which could reduce costs for those staying in it, making it more affordable for those working in the seasonal industry. The land availability for residential development in Cromwell is currently low, meaning that a medium density development could be more realistic to implement. A



multi-complex would also provide for a safe, comfortable stay during the winter months, whereas other solutions such as cabins and camping grounds would not have the same capacity to deal with harsh weather.

Alexandra has a similar population and amenity level to Cromwell. However, it is located further away from the Queenstown Lakes District, which means that it has less ability to retain Queenstown Lakes workers over the peak season due to the distance required to travel, and lack of social opportunities with colleagues located closer to Queenstown and Wanaka. The lack of connection between Alexandra and Queenstown Lakes could make a multi-use complex an unviable investment compared to Cromwell. However, a smaller scale multi-use complex could still be built if support was expressed from Seasonal Workers within that area.

## 8.2 On-site Versus Off-Site Accommodation across Research Areas

When it comes to implementing solutions to seasonal workers accommodation, the location should be evaluated in respect to the town centre and the surrounding orchards. The CODC Rural Resource Areas have been used to further complement our results to further identify recommendations that incorporates a spatial perspective. It is important to note that off-site accommodation commonly refers to accommodation close to a town/centre unless stated otherwise.

### 8.2.1 Roxburgh

Both employers and employees in Roxburgh were generally in favour of on-site accommodation. Informant 9, a CODC member stated that *“there is a different sort of cultures between the growers [in different areas]. Teviot valley is generally more of a family-owned business on a smaller scale compared to Alexandra and Cromwell [which] may have relied more on contractors to do the work differently”*. Furthermore, when it comes to bridging and linking social capital, Besser (2009) highlights that smaller rural towns have a stronger sense of community who may provide support for seasonal workers. When it comes to understanding ‘where’ and ‘what’ a sense of belonging means in more rural towns such as Roxburgh, it should be noted that on-site accommodation can also provide a sense of belonging for workers. In this case, supporting on-site accommodation may be more prominent in not only Roxburgh, but also other rural areas throughout Central Otago. One employer located 15 minutes out of

Roxburgh highlighted that “Accommodation is better in the orchard rather than in Roxburgh. It is not far to get to town. We have the space and the activities for them to not live close to town. They love being on the orchard, it is part of their rural experience”.

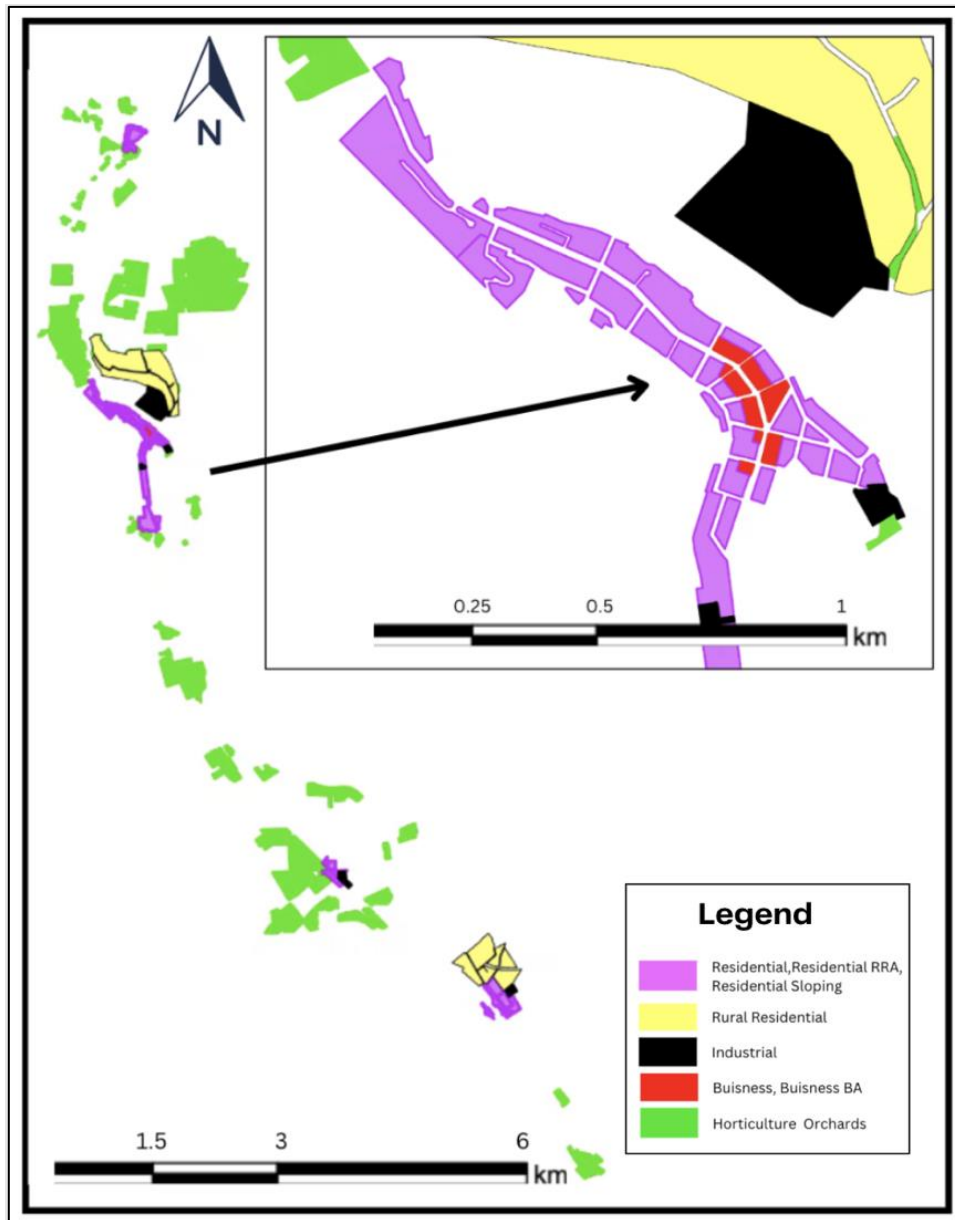


Figure 8.3: CODC resource areas of Roxburgh and the wider Teviot valley

Studies carried out from Wulff & Dharmalingam (2008) highlight that communities wishing to retain its seasonal influx of population need well-developed social support infrastructure including schools, religious activities, meeting places, supporting facilities and so forth which gives migrants the opportunity to make connections with the community. As Roxburgh only

has a population of 588 people, compared to Cromwell with approximately 5,610 people and Alexandra with 5,472 people, the towns socio-economic vitality is much smaller, and employers have highlighted that Roxburgh's social opportunities are more 'spread out' than centralised. Roxburgh's Business Resource Area, which includes supermarkets, services and amenities, is relatively small compared to the surrounding orchards. Although Roxburgh does have some of these services, its lack of amenities and small scale of services (one school, one supermarket, 4 cafes/takeaways), heightens the precarity in investing in off-site accommodation close to the town.

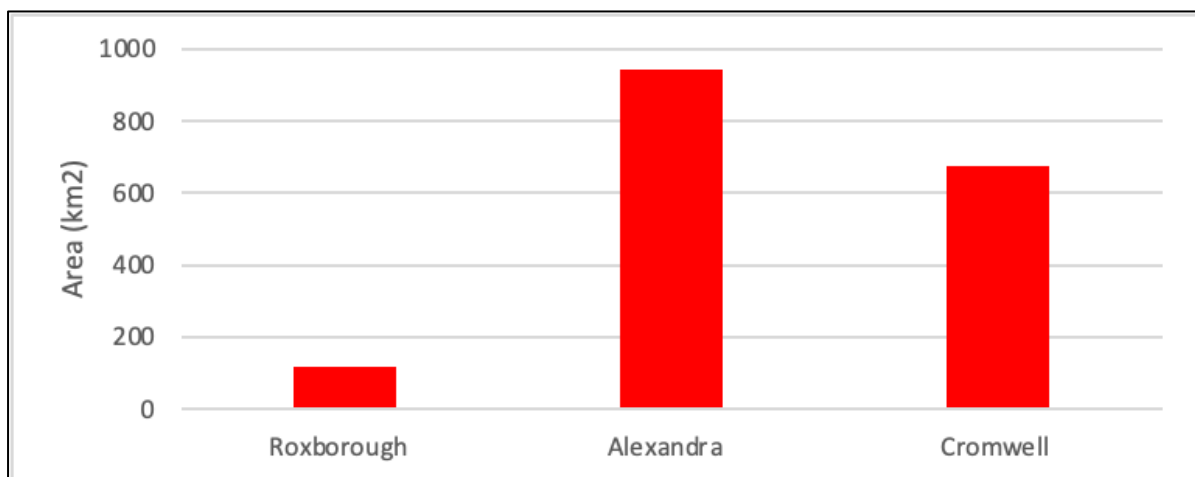
However, as issues surrounding freedom camping within all areas of Central Otago have been proven complicated to manage, a camping ground to address this problem would likely need to be off-site due to the centrality of the issue. Issues in regard to freedom camping closely relate to lack of physical and social safety. Social safety incorporates the encouragement of social capital, as well as creating a sense of belonging for workers, both of which are discouraged with the isolation and seclusion involved with freedom camping. The provision of supplying workers with infrastructure and facilities such as kitchens and toilets are crucial in providing physical safety. As a result, the lack of adequate and well-maintained facilities, including kitchen, sanitation, waste, and laundry facilities, where freedom camping operates creates a further barrier in providing accommodation that is physically safe. Therefore, situating an established camping ground close to Roxburgh Business Resource Area could also promote social capital in the surrounding area and bring seasonal workers closer to facilities, services and resources.

Informant 6 brought up a complicated issue when it comes to freedom camping stating that *"my argument is that the orchard is going to sit there and say well, we did offer them accommodation, but we're going to charge them for it, but they would rather have it free, that's fine but why not work with them in the end and say okay"*. The fact that most accommodation solutions such a multi-complex, houses and cabins as well as camping ground are likely to cost money to employees is something that won't necessarily fix some issues within the seasonal worker accommodation shortage. Freedom camping has been an ongoing issue for the CODC which has resulted in high levels of pollution within waterways (cite this). Informant 6 further highlights this issue stating that *"about every side street between Clyde or Alex or Cromwell, there's someone parked out there, literally on the side of the road"*. It is for this reason that a

camping ground reserved for seasonal workers could ease the demand on key freedom camping spots in the district.

### 8.2.2 Cromwell and Alexandra

Both Cromwell and Alexandra have a substantial population and access to services and tourism attraction to retain guests through the off-peak season. Figure 8.4 and 8.5 illustrates the size of the Business Resource Areas across the three research localities. People travelling for recreational reasons may be more likely to stay in a town centre that offers a wide range of services and amenities. For this reason, a multi-use complex is more financially viable in Cromwell and Alexandra, in comparison to Roxburgh.



*Figure 8.4: CODC Business Resource Area (km<sup>2</sup>) for Roxburgh (118,0445), Alexandra (943,020) and Cromwell (676,841), taken from GIS measurements of CODC resource areas.*

Not only will an off-site permanent accommodation complex benefit employers and employees, but the wider community, as it could help to cater for tourism demand for accommodation across the year for both Alexandra and Cromwell.

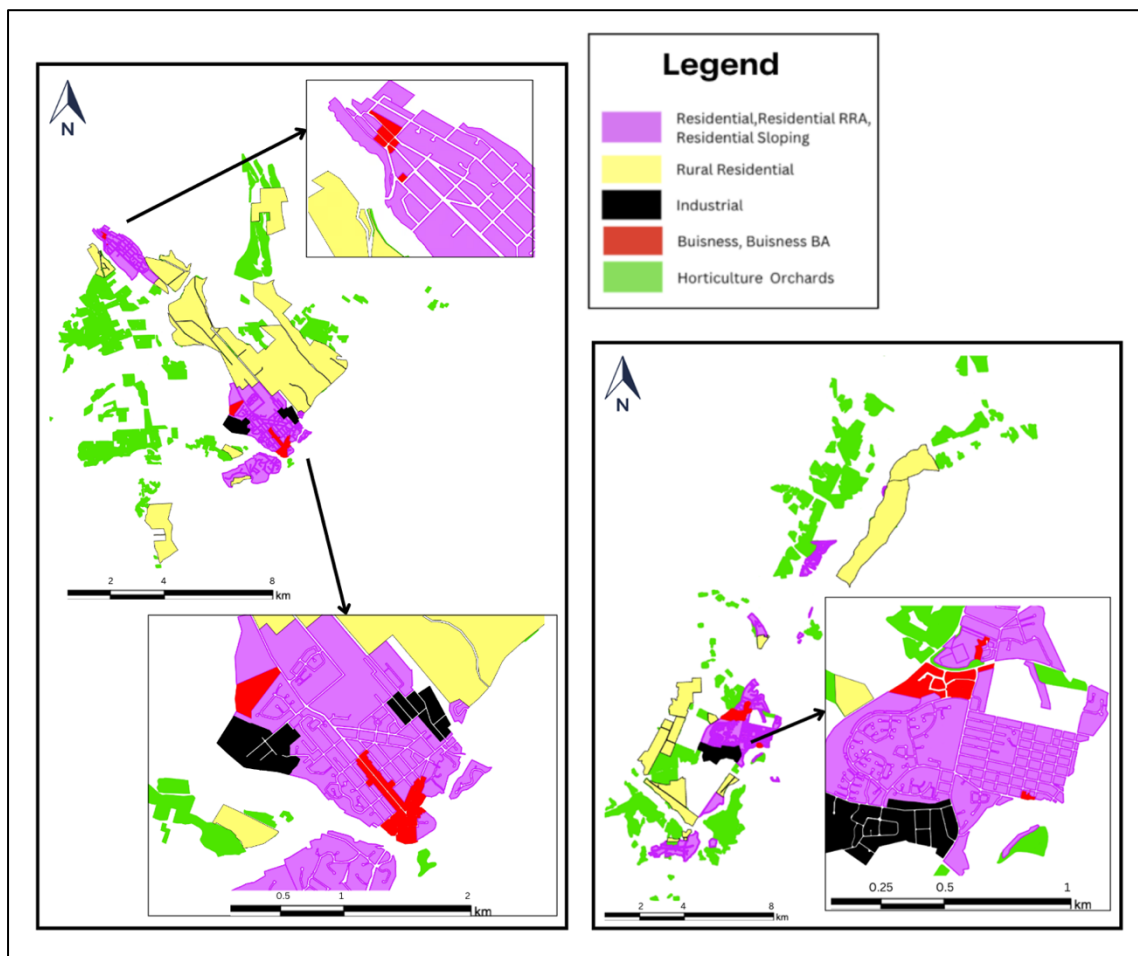


Figure 8.5: CODC resource areas of Alexandra (right) and Cromwell (left).

### 8.3 Analysis of potential policies and strategies to alleviate the shortage of seasonal workers accommodation and address key infrastructure challenges

In this chapter we will discuss more about the infrastructure challenge and the proposed multi-use-built facility in relation to policy review section and the analysis of the survey and interviews from the result section. Due to the limited literature available on multi-use accommodation in our specific study context, we can draw upon examples from Australia and the upper South Island to make relevant inferences. While the literature directly addressing our study context may be scarce, these examples provide valuable insights that can be applied and adapted to our study.

### 8.3.1 Infrastructure challenges

One of the challenges that employers are facing in order to provide accommodation is the high cost associated with establishing new infrastructure such as water, stormwater and wastewater services which are necessary to provide the basic facilities such as toilets and showers for seasonal workers accommodation.

The provision of infrastructure services should be connected to the Council, or alternatively, in areas where such services are unavailable, an effluent tank system will need to be established. In order to comply with building regulations, obtaining a building consent is necessary for establishing these services on the property in rural areas. According to Nwadike and Wilkinson (2022), complying with the stipulated requirements of building code regulations is crucial for ensuring safety in the constructed environment.

Tables 8.1, 8.2 and 8.3 are adopted from AS/NZS 1547:2012 (2012) to show the operational capacities for waste, greywater and black septic. These operational capacities play a critical role in determining the suitability and effectiveness of waste management systems in locations where connection to council services is unavailable.

*Table 8.1 All Waste Septic Tank Operational Capacities*

<b>Population equivalent (persons)</b>	<b>Number of bedrooms</b>	<b>Design Flow (L/Day)</b>	<b>Tank capacity (L)</b>
1-5	1-3	1000	3000
6-7	4	1000-1400	3500
8	5	1400-1600	4000
9-10	6	1600-2000	4500

*Table 8.2 Grey Water Septic Tank Operational Capacities*

<b>Population equivalent (persons)</b>	<b>Number of bedrooms</b>	<b>Design Flow (L/Day)</b>	<b>Tank capacity (L)</b>
1-5	1-3	1000	1800
6-7	4	1000-1400	2100
8	5	1400-1600	2400
9-10	6	1600-2000	2700

*Table 8.3 Black Water Septic Tank Operational Capacities*

<b>Population equivalent (persons)</b>	<b>Number of bedrooms</b>	<b>Design Flow (L/Day)</b>	<b>Tank capacity (L)</b>
1-5	1-3	1000	1500
6-7	4	1000-1400	1800
8	5	1400-1600	2100
9-10	6	1600-2000	2500

Based on the analysis of the interviews, several factors and considerations emerge in addition to the costs involved in constructing the effluent disposal system. In order to ensure effective on-site wastewater management, property owners must be fully informed about the on-site wastewater management system, including its operation and maintenance (AS/NZS 1547:2012, 2012). The AS/NZS 1547/2012 is a New Zealand standard guideline for onsite effluent

management. The maintenance should adhere with the schedules in the operation, management, and monitoring guidelines prepared by the system designer and regulatory authority requirements.

The absence of existing infrastructure in the Rural Resource Area makes it necessary to invest substantial resources in setting up independent systems to manage wastewater effectively. According to New Zealand Plumbers, Drainlayers and Gasfitters Association Inc (no date), various cost factors need to be considered in this context. These include engineer's fees, permit and consent fees, inspection fees, system and installation fees, and other related expenses. There will be an additional cost associated if an old septic tank system will be replaced. This poses a financial burden for employers or accommodation providers seeking to meet the needs of seasonal workers accommodation. The high expenses involved in installing effluent disposal systems in such areas underscore the difficulty of establishing suitable and hygienic living conditions for seasonal workers.

### **8.3.2 Multi-Use Complex Viability**

Although no specific study has been conducted to determine whether a multi-use building can effectively address the issue of seasonal worker accommodation scarcity, it is worth noting that other councils in New Zealand and Australia have successfully implemented a purpose-built facility solution. By constructing a facility such as a multi-use building intended for seasonal workers, these councils have potentially mitigated the challenges posed by limited accommodations for seasonal employees.

In the previous chapter, we discussed examples of multi-use complex solutions, including the example of Hawke's Bay's largest purpose-built accommodation (Bostock New Zealand, 2019), which is designed to accommodate approximately 400 overseas workers. However, it's important to note that this purpose-built facility is specifically intended for Recognized Seasonal Worker (RSE) employees. Despite its intended use for RSE workers, the concept of purpose-built accommodation can be applied in the Central Otago District. Instead of solely catering to RSE workers, such accommodations can be utilized by a diverse range of seasonal workers in the district, including contractors, horticulture/viticulture workers, shearers, and winter seasonal workers.



Sourcing 'suitable' accommodation has always been an issue with seasonal worker, both locally and internationally. In Australia, "there was a significant shortage of housing available across the country with the citrus-growing regions, the lack of accommodation is the biggest barrier preventing skilled workers moving to these regions, and seasonal workers being able to stay safe and comfortable whilst working during seasonal harvest periods" (Citrus Australia, 2022).

Australia serves as a pertinent contemporary example for our case study, particularly due to their adoption of a similar approach in Hawke's Bay, in resolving the scarcity of seasonal worker accommodation which will be further discussed later. Furthermore, Australia has implemented the Pacific Australia Labour Mobility (PALM) Scheme, which addresses labour shortages in agriculture by recruiting workers from Pacific Islands (Pacific Australia Labour Mobility, no date). This scheme shares similarities with the New Zealand Recognised Seasonal Employee (RSE) Scheme which aims to address the deficit of seasonal workers in the horticulture and viticulture industries (Immigration New Zealand n.d.a).

In Australia, a proposed worker's accommodation facility (Figure 8.6 to 8.7) in South Australia's Limestone Coast has been recently approved to house 129 workers from overseas in a 43 single-storey cabins (Badbrook and Whetham, 2023). The dwelling is comprised of four bedrooms, a media room, kitchen, pantry combined family/meals, laundry, bathroom, water closed, and porch (Badbrook and Whetham, 2023). The aim of this proposed project is to increase worker accommodation to fill labour shortages (Badbrook and Whetham, 2023).



*Figure 8.6 Site plan A of South Australia's Limestone Coast multi-facility (Sourced: Naracoorte Lucindale Council, 2023)*



*Figure 8.7 Site plan B of South Australia's Limestone Coast multi-facility (Sourced: Naracoorte Lucindale Council, 2023)*

The inadequate supply of seasonal worker accommodation is not only a challenge for Central Otago but is also prevalent in different parts of the country such as Nelson and Blenheim. The approved proposed purpose-built facility discussed in the policy review section has been re-addressed in this chapter for clarity.

In Hawke's Bay, 2 purpose-built facilities were established. The first proposed seasonal worker village could house 240 workers was approved in April 2018 (Figure 8.8). This was situated in the Urban Residential 2 Zone. The second was built in the Industrial Zone which has 12 five-bedroom units and 16 two-bedroom units (Figure 8.9). Another fully integrated residential accommodation facility was also established on November 2016 in Blenheim that can accommodate 400 seasonal workers (Figure 8.10). All the multi-purpose built were equipped with outdoor recreational areas, kitchen, showers, and toilets.

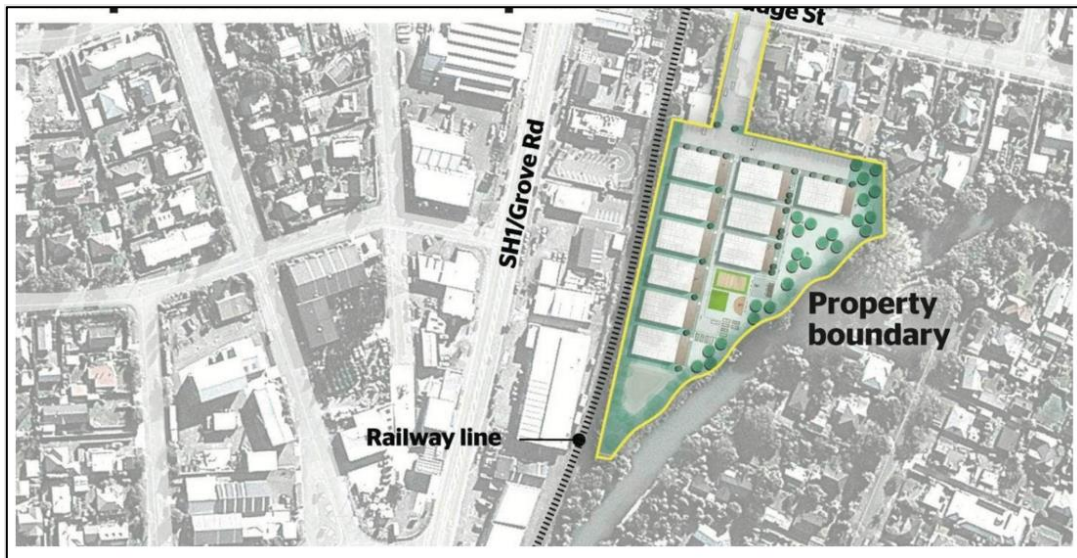


Figure 8.8 Multi Complex Site Plan - 36 and 36A Budge Street (Source: Eder, 2018)



Figure 8.9 Proposed Site Plan of 1347 Omaha (Source: Resource Consent Decision Appendix G)



*Figure 8.10 Proposed Site Plan of 3023 State Highway 1, Riverlands (Source: Resource Consent Application, see Appendix J)*

The successful implementation of these purpose-built facilities in Hawke's Bay and Blenheim serves as a good example for other councils facing similar challenges. The positive outcomes highlight the effectiveness of this approach in meeting the accommodation needs of seasonal workers and its potential to attract a more substantial workforce. The concept of a multi-use-built structure emerged as a prominent recommendation during the interview process, highlighting the valuable insights shared by stakeholders with extensive experience in addressing the challenges associated with accommodating seasonal employees. This recommendation has been consistently echoed by horticulture/viticulture owners during the data gathering as a potential solution to address the challenge of insufficient seasonal accommodation.

Developing a multi-use facility, not only can the shortage of seasonal worker accommodation be mitigated, but it also presents an opportunity to provide essential basic facilities such as kitchen, showers and toilets. This approach eliminates the need for costly installations of independent water and wastewater management systems for seasonal worker accommodations. Instead, a centralized infrastructure can be established, efficiently catering to the needs of multiple residents while reducing overall operational expenses. Thus, building a multi-complex facility emerges as a viable option that simultaneously resolves the accommodation shortage and offers cost-effective provision of fundamental amenities.

Furthermore, a multi-complex creates benefits through encouraging a strong sense of social safety through social capital. Bridging and bonding capital allow for seasonal workers to connect with fellow workers, as well as individuals or groups who share a similar identity. Boese and Phillips (2017), express how vital bonding capital is for temporary workers, as it produces a strong support network within workers themselves, as they tend to share a common or familiar experience. In a similar sense, a multi-complex located off-site encourages bridging capital through workers ability to connect and form relationships with the boarder community. This forms a sense of respect and mutuality among members of the community and workers, who may be unlike in social identity but more or less equal in status or power (Boese and Phillips, 2017). These relationships can also be mutually beneficial, through temporary workers gaining access to support networks, amenities, and services, and workers themselves supporting local businesses. As a result, seasonal workers sense of belonging and integration within localities is enhanced, encouraging worker retention and appeal to the area.

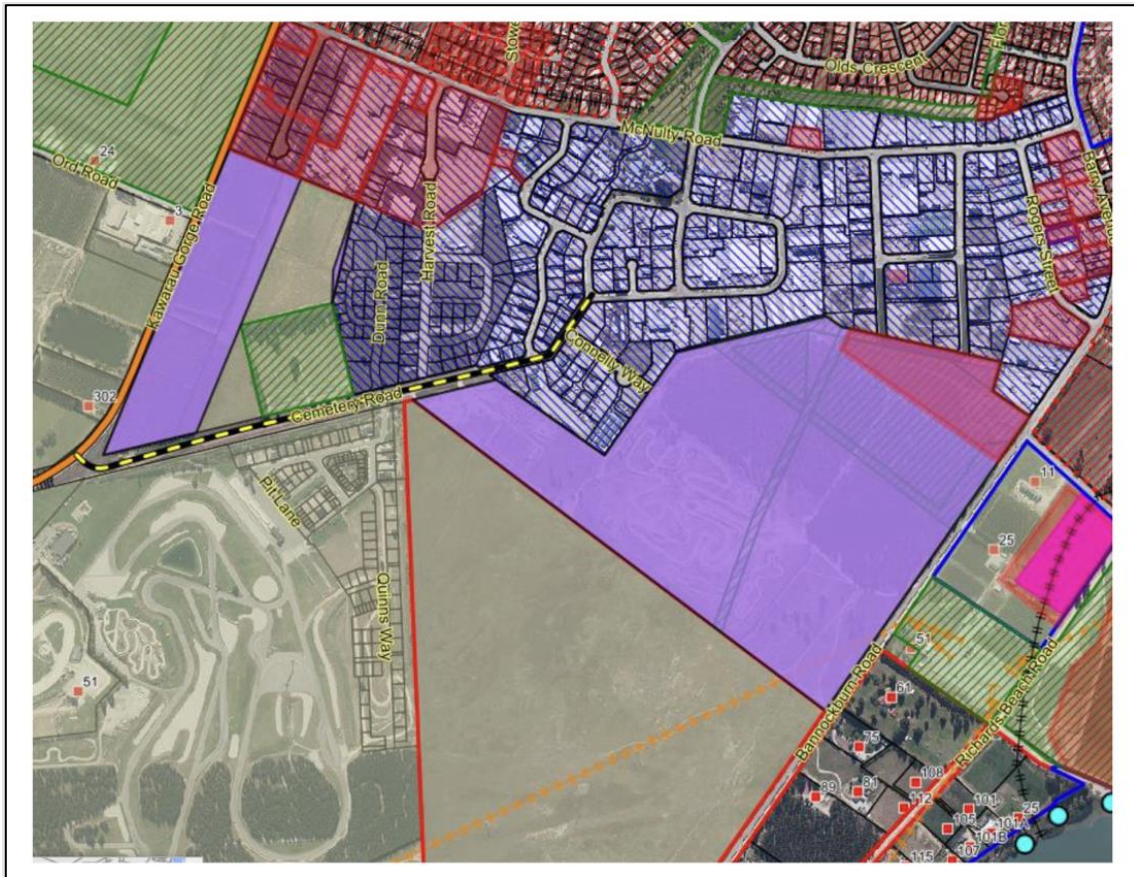
After the analysis of the interview and survey data, it has been identified that the primary factor contributing to the limited availability of accommodation for seasonal workers is the high cost associated with infrastructure provision. Various stakeholders have proposed the construction of multi-complex buildings as a viable long-term solution to address the shortage of seasonal worker accommodation in the Central Otago District Council.

### **8.3.3 Effective Policies and Strategies to Alleviate Seasonal Worker Accommodation Shortages in Central Otago**

In the policy review chapter, an examination was conducted to explore the approaches implemented in other regions of New Zealand by analysing the different district plans. Among the different Councils, the practices of Hastings District Council, serves as an exemplary model for policies and rules. Through their discussions with stakeholders, Hastings Council “identified the preference for small self-catering clusters at the worksite locations for RSE workers, as well as a larger centralized camp model where workers can be transported to various sites” (Hastings District Council, 2020). The variation to the proposed district plan adopted by the Hastings District Council strategy and partnerships committee would allow larger seasonal worker accommodation to be built in the industrial zones (Hastings District Council, 2020). This strategy is considered as distinct and innovative, diverging from the practices of other councils in New Zealand that have not yet adopted similar strategies to address the lack of seasonal worker accommodation as discussed in the policy review chapter.

Central Otago District Council currently has a regulation in place that allows seasonal worker accommodation for up to 60 people only in rural areas. Establishing a multi-complex facility has the potential to adversely affect amenity values, such as noise sensitivity in the rural areas. It is important to address and mitigate these environmental effects, considering that people choose to reside in rural areas to appreciate the lifestyle opportunities provided by open spaces, landscapes, and the natural character of the surroundings (Central Otago District Council, n.d.e). Another aspect to consider is the limitation of council infrastructure, such as the unavailability of water and wastewater services in rural areas.

An alternative proposed solution is to establish a multi-complex facility in the Industrial Area. Currently, A proposed Cromwell Industrial Extension was made under Plan Change 18 (PC 18) (Figure 8.11). PC 18 will give effect to Cromwell Spatial Plan which was approved in July 2019 (Central Otago District Council, n.d.b). PC 18 is zoning an additional area of 52 hectares of Council owned land on Bannockburn Road from Rural Resource Area to Industrial Resource Area. It is important to note that PC 18 has not yet received approval and is currently undergoing the review process.



*Figure 8.11 District Plan GIS Map - PC 18 (Cromwell Industrial Extension) in purple  
(Source: Central Otago District Council, n.d.c)*

The objective of PC 18 primarily involves the conversion of rural land to industrial land use, with minor adjustments to the provisions in the Plan. These adjustments include the incorporation of a new performance standard specific to the Cromwell Industrial Extension, aiming to manage potential access and traffic impacts (Central Otago District Council, n.d.c). The Industrial zone as described in the Central Otago District Plan (n.d.f) exhibits a comparatively lower level of amenity compared to other areas in the district due to the impact of industrial activities. It is also described that industrial activities often requires a substantial level of services, such as water and energy. For these reasons, once PC18 is approved, the additional industrial area can be utilised by developers to establish a multi-complex facility which can potentially address the issue of inadequate seasonal worker accommodation.

There are no specific rules for traveller accommodation or a multi-complex facility under industrial zone, however, in order for a proposal to be considered as permitted activity for



industrial zone it must meet the performance standards of section 9.3.5, which includes retail activity, bulk and location of buildings, noise, screening, signs, off road loading, car parking, and lightspill (Central Otago District Council, n.d.f).

To offer some flexibility in the Rural Areas, a controlled activity is suggested to be added to the existing seasonal worker accommodation rule. This will allow more transportable cabins that can temporarily established for on-site accommodation. As stipulated in Resource Management Act 1991 (RMA) section 104A, the Council is obligated to grant consent in controlled activity status, it also possesses the authority to impose specific conditions on the proposal. These conditions serve the purpose of mitigating any current or potential adverse impacts on the environment. The determination of these conditions is based on the Council's designated areas of control outlined in the district plan.

The controlled activity could be added on the existing Seasonal Worker Accommodation rules of Central Otago District Council. This will provide more option for employers for accommodation.

A controlled activity could be where:

- The proposal is to establish a seasonal worker accommodation that can accommodate at least 80 people. This can be located on versatile land that has already been compromised (Hastings District Council, 2018).

The following matters that could be appropriate for the assessment of seasonal workers accommodation includes;

*“Whether the activity is of such a scale that it is better to be established in an Industrial zone (where infrastructure is more readily available, and the receiving environment is less sensitive.*

*Whether the site is in close proximity to an established area that is more appropriately zoned.*

*Any legal mechanism (ie restrictive covenant) offered by the applicant to limit the use of the buildings to seasonal workers accommodation during peak season.*

*The impact of the scale, character and/or effects of the activity and its compatibility with surrounding activities.*

*The potential for the activity to generate adverse effects in the environment in terms of stormwater quality and quantity.*

*Whether the proposal will significantly compromise the visual amenity of surrounding area, recognising that it is a rural working environment.*

*The potential for the activity to generate significant adverse effects on the environment in terms of noise, dust, glare and road safety” (Hastings District Council, 2018).*

## 8.4 Conclusion of Discussion

The proposed solution presented in this chapter, particularly investing in multi-use complex facilities and exploring alternative infrastructure solutions will not only address the immediate needs of seasonal workers but also contribute to the sustainable growth and development of the horticulture/viticulture industry. However, this proposed solution necessitates a comprehensive review of infrastructure policies, and the existing rules in the Central Otago District Plan.

Future studies could further explore the long-term impact of these facilities on agricultural productivity, worker retention rates, and overall community development. While further research is needed to assess the direct impact of this approach, the successful examples from neighbouring regions and Australia provide valuable insights and support the potential viability of this solution.

## Chapter 9: Conclusion & Recommendations

The subsequent section contains the concluding statements and a variety of thoughtfully developed policy and non-policy recommendations derived from this research project. These evidence-based recommendations are based on a comprehensive analysis of both secondary and primary data, ensuring a well-informed and nuanced approach to addressing this research project's objectives.

### **Recommendation 1. Workshops between industry members and local government**

To address the ongoing housing issues encountered by seasonal employees in Central Otago and Queenstown Lakes District, we recommend facilitating workshops across all industries. The forums would bring together major industries in these regions to explore and develop solutions collaboratively. By bringing together representatives from industries such as horticulture, viticulture, tourism, hospitality, and construction, these workshops can capitalise on their collective expertise, resources, and perspectives to develop innovative and sustainable solutions. The purpose of the workshops should be to promote communication, information exchange, and collaboration between the participating industries. By exchanging perspectives on their challenges and experiences, stakeholders can obtain a comprehensive understanding of the accommodation requirements and investigate collective solutions. During the workshops, participants should discuss potential strategies, such as the construction of purpose-built accommodation facilities, the utilisation of existing infrastructure during off-peak seasons, and the investigation of public-private partnerships for housing initiatives. When developing these solutions, it is essential to consider factors such as affordability, safety, proximity to employment, and access to amenities. Engaging these stakeholders will result in a more comprehensive strategy and aid in overcoming administrative barriers that have impeded previous efforts. Furthermore, through with the participation of local government representatives, the seminars can also address regulatory challenges and solicit support for policy changes. The outcomes of these cross-industry seminars should be strategies and initiatives that the participating industries can implement. To ensure the successful implementation of the specified solutions, it is essential to establish defined deadlines, responsibilities, and follow-up mechanisms.

**Recommendation 2. Facilitate a Stakeholder Committee**

It is recommended that a special committee be formed with members from businesses, employees, and local government to assist the accommodation issues experienced by seasonal workers in Central Otago. The purpose of this committee is to create a forum for cooperation, discussion, and decision-making to enhance the living circumstances and general experience of seasonal workers in the area. The following actions should be prioritised by the committee: Clearly identify, the committee's objectives and mandate in detail, paying special attention to the problems with housing that seasonal workers in Central Otago experience. These objectives may include enhancing the accessibility, affordability, and calibre of housing alternatives, guaranteeing the compliance of relevant regulations, developing positive relations between employees and the local community, and promoting worker safety and well-being. They should also set up frequent committee meetings to encourage honest communication between all parties. These gatherings will provide a forum for information exchange, challenge discussion, solution suggestion, and group decision-making. Encourage cooperation and information exchange between business owners, employees, and local government officials.

**Recommendation 3: Additional seasonal accommodation rules in the Rural Resource Zone of the Central Otago District Plan for on-site accommodation**

The Central Otago District Council has the option to consider incorporating additional rules within the existing Seasonal Workers Accommodation section of the Central Otago District Plan. This could involve adding a controlled activity within the Rural Zone, allowing for the establishment of on-site accommodations on compromised versatile land that can house a minimum of 80 people. Compliance with specific performance criteria, including the provision of necessary infrastructure, would be required. By taking such steps, the horticulture/viticulture sector would have more viable options available within smaller areas of the district such as Roxburgh. The Council would be able to regulate the development of seasonal worker accommodations and ensure their compatibility with the surrounding environment.

**Recommendation 4: Accommodation guidelines for the provision of safe and healthy housing**

The lack of accommodation causes high rents and unsanitary living conditions for the workers (Johnston, 2022). Accommodation guidelines help ensure that dwellings are safe and comfortable for the residents. In the context of RSE (Recognised Seasonal Employer) accommodation, these guidelines are more critical as it affects the safety and well-being of temporary workers who may be unfamiliar with the local environment and culture. Accommodation guidelines if enforced and implemented carefully, will satisfy the recommendation #7 from RSE Scheme in Aotearoa New Zealand: A human rights review report of NZ Human Rights (New Zealand Human Rights Commission, 2022). Although this recommendation is intended for RSE Scheme, this can be adopted in addressing the wider issue of seasonal worker accommodation supply shortages.

**Recommendation 5: Establish a formalised campground**

Look at potential opportunities to establish a CODC formalised campground for seasonal workers with adequate wastewater, shower and cooking facilities to ease pressure on key freedom camping sites in the district. This is most suitable in Roxburgh; however it would also be a viable option in Cromwell and Alexandra.

## Overall Concluding Statements

In conclusion, the purpose of this study was to address the CODC's goal of meeting the demand for secure, affordable transient worker housing in Central Otago, taking into account the requirements of both employees and the horticultural industry. By engaging with key stakeholders including seasonal workers, accommodation providers, employers, and local authorities, we gained valuable insights into the viability of various forms of accommodation in Cromwell, Roxburgh, and Alexandra, considering the varying land-use patterns. Our enquiry also highlighted the on-site and off-site obstacles and opportunities related to the provision of safe and affordable seasonal worker housing. Understanding these factors is essential for devising effective strategies and policies to address housing shortages in this sector. By addressing these obstacles and capitalising on these opportunities, we can foster the well-being of seasonal employees while meeting the demands of the horticultural industry.

It is recommended that specific policies and strategies be implemented in order to mitigate the shortages of migratory migrant housing in Central Otago. These measures should aim to increase the accessibility, affordability, and security of housing options. Moreover, collaboration between stakeholders is necessary for the successful implementation of these initiatives. This study provides valuable recommendations and insights for the CODC by addressing the research questions and analysing the perspectives of various stakeholders. It is anticipated that the findings presented in this report can inform decision-making processes and lead to the development of effective solutions to meet the demand for safe and affordable accommodation for seasonal workers in Central Otago, ultimately to the benefit of both the workers and the horticultural industry. Further study is required to investigate innovative housing solutions and evaluate the long-term effects of implemented policies and strategies on the availability and quality of seasonal worker housing in Central Otago.

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## Appendices

## Appendices

**Appendix A** Aspects of analysis based Foucauldian discourse that will be broadly adopted as themes.

<i>Aspect of Analysis</i>	<i>Description</i>
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<i>Power Relations</i>	Examination of how power is exercised over seasonal workers' accommodations through policies, regulations, and practices.
<i>Knowledge Production</i>	Analysis of the types of knowledge produced, sources of authority, and use of knowledge in legitimising or challenging power relations
<i>Ideologies, Perceptions, Status quo</i>	Identification of dominant ideologies and social norms embedded in the discourse related to seasonal workers' accommodation
<i>Resistance and Agency</i>	Exploration of how seasonal workers and other actors resist or challenge the dominant discourse and exercise agency in shaping their living conditions
<i>Effects and Consequences</i>	Examination of the impacts of discourse on seasonal workers' living conditions, well-being, social integration, and wider social, economic, and political dynamics.



## Appendix B Framework for Discourse Analysis

<i>Article</i>	<i>Date/Publication</i>	<i>Context</i>	<i>Exert/Quotes</i>	<i>Theme</i>	<i>Secondary Commentary</i>
1	03.02.23  Otago Daily Times  Written Article	<b>Hawkes Bay</b>  Apple Orchard  Offsite Accommodation	<i>Nine workers live in one room on the ground floor. Five bunk beds sit on one side of the room, and a cooking area on the other. One mattress lies on the floor. Each RSE worker pays \$150 weekly for a dorm bed here, and the kitchen.</i>	Poor housing conditions  <b>Lack of payment transparency</b>	N/A
		Post-covid	<i>Most RSE workers choose to stay in employer-provided group accommodation, so they have convenient transport to work and don't have to organise furniture and renting contracts.</i>		

		RSE worker lived experiences	<i>Employers deduct rent and transport from their pay. Some workers know how much they are paying, and some do not.</i>		
2.	04.10.2022  Otago Daily Times  Written Article	<b>Central Otago</b>  RSE worker lived experiences.  <b>Post Covid</b>	The discourse around "modern-day slavery" highlights the power dynamics at play in the employment relationship, where employers have significant control over their employees' working conditions and livelihoods. The use of this term draws attention to the way in which workers are exploited and their labour is devalued, positioning employers as the dominant actors in the relationship.	Lack of agency for RSE workers when tied to an employer	N/A
3.	15.12.22  Otago Daily Times  Written Article	Central Otago  <b>Post-Covid</b>	Some advertisements specifically say no “cherry workers wanted”, and others requiring four weeks’ rent and key bonds (which adds up to nearly \$1000) are unlikely to appeal to short-term workers. year-round tenants were more important to him than short-term ones.	General trend of lack of affordable housing in Central Otago peri-urban areas. This disproportionately affects short-term or transit populations.	N/A



		General Article about rental crisis in central Otago.	<p><i>A combination of being a summer fruit producing area and one of the country's most popular holiday spots created unique problems in Central Otago.</i></p> <p>6000 extra workers including recognised seasonal workers add pressure to an already compromised market.</p>	Increase of temporal populations strain existing public and business amenities – particularly holiday parks	
4.	12.12.2022  1 News NZ  Written Article	Review article of the Human rights commission report of RSE workers in NZ  <b>Post COVID</b>	<p>Local authority has stated RSE employer will undergo educational processes to be “crystal clear” of their contractual obligations.</p> <p>Commissioner report, workers were pertained to unexplained pay deductions, lack of healthcare and inadequate housing, furthermore, denied of personal and cultural freedoms”.</p>	<p>Barriers aid in a lack of collective action or agency for workers to obtain baseline necessities.</p>	<p><i>Twitter Thread:</i></p> <p><i>“As EEO Commissioner, it has been absolutely distressing to witness the living conditions, exploitative practices and apparent disrespect on the mana, collective and</i></p>

			<p><b>Condemned to join unions.</b></p> <p><i>Our engagements have revealed what we consider are gaps in the scheme, which may enable systemic pattern[s] of human rights abuses throughout the country.</i></p> <p><i>Due to a lack of oversight, regulation, enforcement, and human rights protections within the RSE scheme,</i></p> <p><i>Employers are able to exploit workers with few consequences if they wish.</i></p>	<p>The report and statements from RSE activist groups have noted a clear trend of Neglect and lack of duty of care for employers to provide the basic amenities and services.</p> <p><b>Positive and empathetic tone from secondary commentary</b></p>	<p><i>cultural identity of the workers that are coming from the Pacific to work in our industries here.” – commenter A</i></p> <p><i>“These workers need access to unions to provide education and advocacy. Time for their voices to be heard” – Commenter Q</i></p>
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<p>5.</p>	<p>12.12.2022  Stuff News  Written Article  Audio/Visual</p>	<p>Critical Journalism article that examines and causes and consequences of RSE scheme in New Zealand  <b>Post COVID</b></p>	<p>Ensuring that we grow the number of RSE workers and are ensuring they are being properly cared for.  Following regulation set</p> <ul style="list-style-type: none"> <li>• Rates – for what the minimal expectation is for their wages and working conditions.</li> <li>• Implementing sick pay as legally binding in contracts</li> </ul> <p>As stated by MP Jacinta Arden.</p> <p><i>As evidence of how much control employers had over the lives of their employees referred to workers being banned from consuming kava in their own time and another example where a female RSE worker began a sexual relationship during their employment and was then forced to present a negative pregnancy test to their employer in order to avoid being fired.</i></p>	<p>Examples of how employers asserted control over the lives of their employees, emphasising the theme of employer control and its effect on the autonomy self-determination.</p> <p>The present configuration of the RSE programme has engendered circumstances that may lead to infringements upon various fundamental rights, including but not limited to the rights to equality and freedom, to fair and satisfactory</p>	<p>Twitter Thread:  <i>“This is inevitable with a privatised scheme and visas linked to employers. The whole thing should be run by a dept. of Labour and approved employers should compete on conditions, wages etc for the best workers. Bad employers should be banned from the scheme.</i></p> <p>Commenter X</p>
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				labour conditions, to a decent standard of living, to unrestricted mobility, to privacy, to cultural expression, to the freedom of association, and to health.	“That is degrading and disgusting. What you do outside work is No one else's business.” – Commenter D
6.	8.08.2022  Stuff News  “Closer look” feature piece	Face-to-face interview with migrant workers in their accommodation in horticultural, discussing their health and well-being.  <b>Post COVID</b>	<i>Migrant horticulture workers are being housed six men to a room, charged \$150 a week to sleep in freezing and damp conditions which see them fall sick repeatedly, and then refused paid sick leave.</i>  <i>The boss told us he did not take sickness seriously unless someone needed to go to the hospital, the man's co-worker said.</i>	A power differential exists between the employer and employees with regards to matters of health and safety. The boss's apparent disregard for sickness unless it reaches a critical level requiring hospitalisation may indicate a lack of emphasis on the welfare and health of employees, potentially resulting in	“I had no idea this happened in NZ, this beyond awful and inhumane” – Commenter Z  “It used to be Backpackers and Young Kiwi's doing this work, until Slave Labour

			<p>Stuff agreed to call the man “Matthew” instead of his real name because he feared he would be punished for speaking out.</p>	<p>their undue hardship to sustain productivity. This serves to strengthen the notion that the employer wields substantial authority over the employees and their means of livelihood.</p> <p>The employees interviewed exhibit reluctance to express their opinions under their authentic identity due to apprehensions of potential repercussions from their employer. The presence of apprehension towards possible retribution</p>	<p>became the Norm”. Commenter W</p>
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				suggests that the employer holds the authority to coerce and penalise employees who express dissent regarding their labour circumstances.	
7.	08.10.2022 Stuff News National Correspondent provide critical feature column on the effects of lockdown.	<b>During Lockdown Setting</b>	<i>there was concern over the standard of some accommodation - workers refer to some lodgings as “camps”, “prisons” and “reservations”; wages haven't kept pace with the cost of living; the workers feel they have no rights and no voice; and a lack of freedom outside of work hours.</i>  <b>Employer statement:</b> <i>during lock down, it was t was very stressful, costs were exploding, we were essentially paying for everyone’s accommodation, thousands of dollars a week we were losing. It</i>	The perception among workers that they lack rights and a voice implies a <b>constrained ability to engage in collective bargaining and self-advocacy</b> . The absence of autonomy during non-working hours implies that the <b>employees' employers possess the ability to govern their</b>	<i>“I'm in Hawkes Bay, every word of this rings true. Drive past the orchards and run down hotels. The workers don't even smile anymore. I've lodged with ERO over employment conditions in the orchards. They are slaved, crap tools, no toilets or clean water.”</i> — Commenter Y

			<p>wasn't a good period for the business, or me personally.</p> <p><b>Employee statement:</b></p> <p><i>Definitely we were not treated with respect - how they talk to us is like they think that we are dumb, like we are illiterate people," she says.</i></p> <p><i>"If we ask them questions, or 'can you repeat that' ... if we ask them anything that's wrong with our payslip ... they get angry."</i></p> <p><i>The workers often live in fear</i></p>	<p>existence outside of the professional setting.</p> <p>Covid 19 circumstance exacerbated the already present tension between RSE workers and their employers.</p> <p>Workers' emotional and mental health are being compromised as a result of employer action.</p>	
8.	28.03.2023	Filmed before Cyclone Gabrielle*		<p>Economic power or financial control, where the workers are being kept</p>	<p>YouTube Comments:</p>

	<p>NZ Heald Local Focus – Visual/Audio interview in Hawkes Bay for fruit Harvest</p>		<p>“Conditions are so bad, some of the workers say they are desperate to go home but have been unable because they are in debt to their employers for flights, work clothing, or tools. Some have so many deductions from their pay each week, they end up with as little as \$100.”</p> <p>“It seems that the scheme allows for what can only be described as debt bondage, where salary deductions are being used as a means to financially control workers and thus to remove agency from them.”</p> <p><b>Local authority suggested:</b></p> <p>Government to mandate a worker-based initiatives that allow for transparent system between all employers. So that cases are no pertained as an</p>	<p>in debt bondage by their employers. The workers are unable to leave their jobs because they owe their employers money for expenses such as flights, work clothing, or tools, training, which the employers have deducted from their pay. These deductions leave the workers with very little pay and restrict their agency to make choices regarding their employment and living circumstances.</p>	<p>“Why do you think growers want the RSE scam to continue so badly they carve back half their wages in fees, rent, charges, transport rake back and made-up costs and there is often the tax-free rental property scam on site or hostel owners in nearby towns” – Commenter P</p> <p>“12 in one room that’s not right. Come on NZ. One fridge” – Commenter S</p>
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			<p>isolated incident and employers can be held accountable.</p> <p>“Toxic pockets”</p> <p><b>Purpose built RSE accommodation:</b></p> <ul style="list-style-type: none"> <li>-provide pastoral care and assist in mobility to healthcare services, was crucial during COVID 19.</li> <li>-highlights the importance of outdoor amenities</li> <li>- functionally built</li> </ul> <p><b>Ethical surveying:</b> RSE workers do not know what they are paying for and not disclosed in pay slip.</p>	<p>Employers were reluctant to comment to the media.</p> <p>Recurrent theme of lack of transparency</p> <p>Local authorities deflect responsibility to care for RSE workers by blaming employers.</p>	
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<p>9.</p>	<p>23.06.2020</p> <p>Otago Daily Times</p> <p>Pre-COVID</p>	<p>Review on survey results from the Ministry of Social development</p>	<p><i>provided \$40,000 funding for the survey, which was carried out by Martin Anderson, of Cromwell, and Tara Druce, of Alexandra.</i></p> <p><b>Local authority recommendations:</b></p> <p>There is a demand for accessible and high-density housing, specifically in the areas of Cromwell and Alexandra.</p> <p>The governance committee intends to engage in discussions regarding the raised issues with a diverse array of agencies and organisations.</p> <p>The initial phase of the comprehensive labour market analysis involves the horticulture and</p>	<p>Local authorities in central Otago are attempting gain a broader understanding of the knowledge production of the discourse of RSE workers lived experiences</p>	<p>N/A</p>
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			<p>viticulture report, which will be succeeded by further investigations and questionnaires aimed at other significant industries that are heavily dependent on seasonal employees, such as the hospitality sector.</p>		
10.	21.08.2022	<p>News special on NZ's horticulture industry – RSE Accommodation Marlborough Region</p>	<p><b>Former employee and now union organiser</b>  <b>Interviewed:</b>          acknowledges the significant role RSE workers hold in the NZ economy.</p> <p><b>Working Conditions:</b>          Accommodation neither affordable nor housing.</p> <p>28 workers in 4 rooms – rental price also disproportionately higher than for locals</p>	<p>Strict rules and hidden costs at Motels taking advantage of accommodation shortage, further minimise the autonomy of these workers and local authorities reportedly “allow” this behaviour.</p> <p>Owner’s lack of interest to discuss and flourishing</p>	<p>YouTube Comments:          *Comments were turned off</p>

			<p>Recognised many RSE workers are reluctant to speak out given their contractual agreement. Often faced with accept the environment or go home.</p> <p>15 years later the exploitation has exacerbated.</p> <p>No voice and long way home, “accept what your given” mentality.</p> <p><i>Most vulnerable labour-market</i></p>	<p>lucrative business and local accommodation are exploiting à result when onsite accommodation cannot be provided.</p> <p>Disconnect between all stakeholders involved.</p>	
11.	12.12.2022  Rural News	The perspective of the ending countries of RSE workers from Pacific Islands	<p><i>Several Pacific nations express apprehension regarding the potential loss of skills. Fiji is currently facing challenges in retaining its hospitality workforce, particularly considering Australia's recent expansion of the Pacific mobility</i></p>	<p>Despite the negativity associated with the RSE scheme in New Zealand it is still regarded as the most lucrative means of income for RSE workers</p>	N/A

		<p><i>scheme to encompass aged care and hospitality personnel.</i></p> <p><i>it has been observed that they are currently receiving remuneration ranging from NZ\$1.80 to \$3.60 per hour in Samoa, whereas the minimum wage in New Zealand is \$21.20. A single visit to the Rural Self-Employment Training Institute (RSE) enables the staff to subsequently engage in activities such as constructing a residential dwelling or purchasing an automobile.</i></p> <p>being away can create stresses in families. “Sometimes my wife calls asking me to discipline one of the children.” That’s hard at the best of times but imagine doing this over a video or phone link. “It’s very hard for some of our men to be away from their families for six months,” he says, let alone his year and a half.</p>	<p>and seen as the “most desirable” means of livelihood.</p> <p>Inniating a transnational competition for migrant workers as these pacific nations suffer subsequently from a labour shortage.</p>	
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<p>12.</p>	<p>08.03.2023  Written Blog Post -  Council for International Development NZ</p>	<p>Response to Cyclone Gabrielle on RSE workers in Hawkes Bay</p>	<p><i>The unprecedented destruction across the region included significant damage to orchards and worker accommodation - and around 800 RSE workers were dislocated.</i></p> <p><i>RSE workers have been integral contributors to the recovery effort post the cyclone and beginning the rebuild. In turn, they have been supported by the local community and government. They are being ensured full time employment either in a different region or by continuing to help Hawkes Bay orchards with the upcoming harvest</i></p>	<p><b>Social capital</b> – bonding and bridging networks between local community and authorities to rebuilt after the natural disaster.</p> <p>The COVID-19 pandemic has provided valuable insights to RSE stakeholders, such as employers, industry representatives, Pacific liaison officers, and government officials, regarding the significance of collaborative work and the necessity of being flexible, responsive, and adaptable to dynamic</p>	<p>N/A</p>
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				circumstances. These lessons have proven to be beneficial in addressing the current crisis and the aftereffects.	
13.	22.03.2021  The Conversation NZ	Negative response Freedom Camping in New Zealand Napier and Queenstown	<i>Crowding at car parks and beach fronts, road congestion, littering and campers using the natural environment as toilets became a major concern.</i> <i>Local governments are empowered to pass bylaws that regulate freedom camping more tightly. In 2019, the central government announced investments of NZ\$8 million in public amenities and education as well technology, such as the Ambassador App (for Android and Apple) to help monitor freedom campers.</i>	The influx of tourists has resulted in resentment in local communities.  Parliamentary Commissioner for the environment has issued a series of stricter regulations of self-contained vehicles only, a definitive time of occupying and for local	<i>It gets so bad over summer here in Napier! - S</i>

				governments to ensure freedom camping penalties are obeyed.	
				Local authorities attempt of monitoring and enforcement do not fix the existing accommodation shortage in these areas.	
14.	21.09.2022  Sun Live  Written Article	Kiwi Fruit Orchard in Katikati	A new orchard worker accommodation project, valued at \$5 million, has been announced for the town of Hawke Bay. Originally intended to house 60 recognised seasonal staff, the project has since been expanded to accommodate 140 individuals. This decision was made in light of the Covid-19 pandemic.  According to Seeka, the construction of specialised lodging for Recognised Seasonal Employers	Innovation of purpose-built accommodation to safeguard employers to uphold the necessary number of seasonal workers.	N/A



			<p>(RSEs) at Sharp Rd will substantially augment the capacity for accommodating individuals in the region, while simultaneously protecting the industry from the risk of lacking suitable accommodations for essential seasonal personnel.</p>	<p>The existing facility will be replaced with a modernised building that includes two recreational lounges and WIFI. – Adaptive reuse initiatives of existing facilities.</p> <p>Also notes the corporation's partnership with Iwi and the Provincial Growth Fund</p> <p>Active collaboration between variety of groups to be provide for all member of the community.</p>	
15.	27.03.2023	<i>Queenstown</i>	<p><i>Queenstown Lakes District Council approved a five-year housing action plan for consultation.</i></p>	<p>Local Council attempt to redirect the status quo.</p>	N/A

	<p>RNZ News Written Article</p>	<p>Housing shortage</p>	<p><i>I was hoping through this discussion that we'd get an indication that government is more of a partner, but it sounds like it's a partnership - but really it's on us to implement it and drive it</i></p> <p><i>I'm just concerned that there's not scope for change.,</i></p> <p><i>The plan proposed an evidence-based understanding of the district's housing issues, monitoring key indicators, purchasing and developing land for affordable housing, and incentivizing current and new developers to provide it.</i></p> <p><i>Queenstown Lakes' housing crisis saw people sleeping in cars, rentals being turned into Airbnbs, and rising rents as more renters competed for fewer rentals.</i></p>	<p>It was an attempt as partnership between Queenstown district Council and local support agencies and central government.</p> <p>One local Councillor noted it is more of a central government issue which should be solved via taxes in amore equitable manner.</p>	
<p>16</p>	<p>23.02.2023</p>	<p>Effects of Cyclone</p>	<p><i>More than 400 workers from the Pacific were evacuated to the Samoan Assembly of God church</i></p>	<p>Example of social capital within the wider pacific</p>	<p>N/A</p>

	<p>RNZ News Written Article</p>	<p><i>Gabrielle on RSE workers</i></p>	<p><i>in Napier after being displaced by floodwaters that swept through North Island towns during Cyclone Gabrielle.</i></p> <p><i>Food and supplies had been donated by the workers' employers.</i></p> <p><i>"We managed to contact our family back home and they were: 'Where were you guys? And they all think that we lost our lives – RSE worker.</i></p>	<p>community and collaboration with Defence NZ</p> <p>Negative impact on mental health and well-being of workers and a displacement from their sense of place and belonging.</p>	
<p>17.</p>	<p>14.03.2023</p>	<p><i>Central Otago Residential Development Plan Change</i></p>	<p>Fulton Hogan has requested a plan change from the Central Otago District Council for a residential/business development at the quarry on the Luggate-Cromwell Road.</p> <p>The company wants to turn the quarry into 450–500 homes, a small commercial development, and an industrial sector.</p>	<p>In relation to the proposal, it addresses a market void by allowing higher density development to occur on much fewer sections than were previously provided. These smaller sections would reduce land costs.</p>	<p>N/A</p>

				<p>thereby increasing affordability.</p> <p>Additionally, by allowing a more intensive use of that land. This would increase the overall affordability of new homes in Cromwell, as well as provide a greater variety of home types to accommodate changing requirements.</p>	
18.	21.08.2020  Hastings District Council  Written Article	Policy Discourse	<i>The Hastings District Council strategy planning and partnerships committee recently adopted a proposed district plan variation that is expected to facilitate the process for employers seeking to accommodate RSE (Recognised Seasonal Employer) workers.</i>	<p>Allow for more flexibility for accommodation amenities to be built or buildings to be re-purpose for this. – more agency to</p>	N/A

		<p>Hastings</p>	<p><i>Small self-catering settlements on the sites where RSE employees were operating were deemed preferable by stakeholders</i></p> <p><i>Currently, the proposed district plan does not include provisions for seasonal migrant housing, with the exception of the plains production zone, where up to 125m2 of gross floor area is permitted.</i></p>	<p>developers and organiser to provide this activity.</p> <p>Ultimately legalising seasonal workers' accommodation in residential zones.</p> <p>Brings the transit community into "mainstream" society.</p>	<p>N/A</p>
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				<p>Opportunities for social cohesion with wider community.</p>	
19.	07.07.2022  Otago Daily Times  Written Article	Cromwell  Central Otago	<p>–The Central Otago Affordable Housing Trust is a "dead duck", and board members will step down, its "shocked" chairman Glen Christiansen said yesterday after the Central Otago District Council rejected a proposal to give \$16 million worth of ratepayer-owned land to the trust.</p> <p>Many councillors said the Cromwell Community Board should offer alternative housing solutions in the next stage of its joint venture Gair Ave development instead.</p>	<p><b>Discrepancies in perspective between key local authorities</b></p> <ul style="list-style-type: none"> <li>• Central Otago Affordable housing trust</li> <li>• Councillors</li> <li>• Cromwell Community Board</li> </ul> <p>Inability for these organisations to collaborate competently. Redirection of affordable housing as central government issue à</p>	N/A

				Burocratics division of power	
20.	19.01.2023  Stuff News  Written Article	<i>Queenstown</i>  <b><i>Post-COVID</i></b>    <i>Provides broader contexts</i>	More than 20 residents living in nine central Queenstown apartments have been given notice to move out so their homes can be converted to short-term Airbnb rentals.  <i>The shortage of worker accommodation has led to many tourism and hospitality businesses closing at key times because they do not have enough staff to open full time.</i>	Pressure from international domain of tourism industry opening against an already saturated market of rental short-term accommodation.  (Residential) Visitor Accommodation has been lucrative market on property owners. Does not comply as RSE accommodation so strikes opportunities for both employers and employees	N/A

				to find offsite accommodation.  All types of seasonal workers are suffering with Airbnb exacerbation of shortage for affordable short-term housing	
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## Appendix C Letter from Central Hawkes Bay District Council

RSE: **CHBDC**



**To:** Rowena Miller <Rowena.Miller@Cluthadc.govt.nz>  
**Subject:** RE: Resource Consent Team

**Caution: This message originated from outside CDC, DO NOT click links, open attachments, or follow instructions without validating your trust in the sender first. If unsure, please contact IT.**

Hi Rowena

You can refer your RSE request to the District Plan: Chapter 4 Rural Zone: <https://eplan.chbdc.govt.nz/eplan/#Rules/0/21/1/0> and Chapter 12 Relocated Buildings and Temporary Buildings and Temporary Activities: <https://eplan.chbdc.govt.nz/eplan/#Rules/0/13/1/0>

Usually the orchards and farms are located in the rural zones and the site owner 'as of right' can build up to 7% or 700m<sup>2</sup> without requiring resource consent provided there's no breach of the rules in terms of boundary setbacks etc, alternatively temporary buildings can be added (up to 12months I believe) i.e. portacombs/cabins etc.so usually they don't require resource consents for temporary/seasonal worker accommodation.

Kindest Regards  
 Bianca



Planners  
**Central Hawke's Bay District Council**

PO Box 127  
 28 - 32 Ruataniwha Street  
 Waipawa 4210  
 06 857 8060

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**!** Got an idea or feedback? Fantastic! You can [let us know here](#)

Central Hawke's Bay  
**Mayoral Relief Fund**



**Appendix D** Central Hawke’s Bay Council’s Assessment Matters for Seasonal Worker Accommodation under Discretionary Activity for General Rural Zone (Source: Central Hawkes Bay, n.d.b).

RULES	ASSESSMENT MATTERS
<p><b>GRUZ-AM1</b></p> <p><b>Building Coverage, Height of Buildings, Height in Relation to Boundary, Setback from Roads and Rail</b></p>	<p><i>The degree to which the proposed buildings:</i></p> <ol style="list-style-type: none"> <li>1. <i>will be compatible with the character and amenity of the area, including the nature and scale of other buildings in the surrounding area;</i></li> <li>2. <i>will adversely affect the life-supporting capacity of the rural soil resource, and any potential for reverse sensitivity effects to arise;</i></li> <li>3. <i>will overshadow adjoining sites and result in reduced sunlight and daylight;</i></li> </ol>

<p><b>Network, Setback from Neighbours</b></p>	<p>4. <i>will cause a loss of privacy through being over-looked from neighbouring buildings;</i></p> <p>5. <i>will block views from properties in the vicinity, or from roads or public open space in the surrounding area;</i></p> <p>6. <i>will diminish the openness and attractiveness of the street scene;</i></p> <p>7. <i>will detract from the amenity of adjoining sites, in terms of such matters as noise, odour, dust, glare or vibration occurring as a result of the building; and</i></p> <p>8. <i>will adversely affect the safe and efficient operation of the land transport network.</i></p> <p><i>The ability of the applicant to:</i></p> <p>9. <i>provide adequate opportunity for garden and tree planting around buildings;</i></p> <p>10. <i>provide adequate vehicle parking and manoeuvring space on site;</i></p> <p>11. <i>provide adequate outdoor space on the site for all outdoor activities associated with residential and other activities permitted on the site;</i></p> <p>12. <i>mitigate any adverse effects of increased height or exceedance of the height in relation to boundary, such as through increased separation distances between the building and adjoining sites or the provision of screening; and</i></p> <p>13. <i>mitigate any adverse effects on people affected by the proposal.</i></p> <p><i>The ability of the applicant to adequately dispose of effluent, which avoids:</i></p> <p>14. <i>any potential contamination of groundwater;</i></p> <p>15. <i>any potential slope instability problems;</i></p> <p>16. <i>any potential odour, noise and vibration nuisance to neighbours; and</i></p>
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	<p>17. <i>any potential seepage of effluent at ground surface.</i></p> <p>4. <i>The degree to which the non-compliance with the standard allows more efficient, practical and/or pleasant use of the remainder of the site.</i></p> <p>5. <i>The degree to which alternative practical locations are available for the building.</i></p>
<p><b>GRUZ-AM2</b></p> <p><b><i>Shading of Land and Roads</i></b></p>	<p><i>Trees on Boundaries</i></p> <p>1. <i>The degree to which planting within the setback area can adversely affect the health of vegetation or stock, or cause a significant increase in the risk of fire.</i></p> <p>2. <i>The degree to which the planting of trees will overshadow adjoining sites and result in reduced sunlight and daylight, and/or result in the loss of productive land.</i></p> <p>3. <i>The degree to which trees may potentially damage structures due to wind fall or root growth.</i></p> <p><i>Trees adjoining Public Roads</i></p> <p>1. <i>The degree to which planting will cause shading and ice forming on roads in winter, or root damage to the road.</i></p> <p>2. <i>The degree to which trees may potentially cause a road safety risk due to wind fall.</i></p>
<p><b>GRUZ-AM3</b></p> <p><b><i>Setback for Sensitive Activities from Existing Intensive Primary Production Activities</i></b></p>	<p>1. <i>The likelihood of the proposed activity to generate reverse sensitivity effects on the intensive primary production activity and the potential impact these effects may have on the continuing effective and efficient operation of the intensive primary production activity.</i></p> <p>2. <i>The extent to which alternative locations have been considered.</i></p>



**Appendix E** Council's Assessment Matters for Seasonal Worker Accommodation under Discretionary Activity for Rural Production Zone (Source: Central Hawkes Bay, n.d.b).

RULES	ASSESSMENT MATTERS
<p><b>RPROZ-AM1</b></p> <p><b>Building Coverage, Height of Buildings, Height in Relation to Boundary, Setback from Roads and Rail Network, Setback from Neighbours</b></p>	<p><i>The degree to which the proposed buildings:</i></p> <ol style="list-style-type: none"> <li>1. <i>will be compatible with the character and amenity of the area, including the nature and scale of other buildings in the surrounding area;</i></li> <li>2. <i>will adversely affect the life-supporting capacity of the rural soil resource, particularly the highly productive land of Central Hawke's Bay, and any potential for reverse sensitivity effects to arise;</i></li> <li>3. <i>will overshadow adjoining sites and result in reduced sunlight and daylight;</i></li> <li>4. <i>will cause a loss of privacy through being over-looked from neighbouring buildings;</i></li> <li>5. <i>will block views from properties in the vicinity, or from roads or public open space in the surrounding area;</i></li> <li>6. <i>will diminish the openness and attractiveness of the street scene;</i></li> <li>7. <i>will detract from the amenity of adjoining sites, in terms of such matters as noise, odour, dust, glare or vibration occurring as a result of the building; and</i></li> <li>8. <i>will adversely affect the safe and efficient operation of the land transport network.</i></li> </ol> <p><i>The ability of the applicant to:</i></p> <ol style="list-style-type: none"> <li>9. <i>provide adequate opportunity for garden and tree planting around buildings;</i></li> <li>10. <i>provide adequate vehicle parking and manoeuvring space on site;</i></li> </ol>

	<p>11. <i>provide adequate outdoor space on the site for all outdoor activities associated with residential and other activities permitted on the site;</i></p> <p>12. <i>mitigate any adverse effects of increased height or exceedance of the height in relation to boundary, such as through increased separation distances between the building and adjoining sites or the provision of screening; and</i></p> <p>13. <i>mitigate any adverse effects on people affected by the proposal.</i></p> <p><i>The ability of the applicant to adequately dispose of effluent, which avoids:</i></p> <p>14. <i>any potential contamination of groundwater;</i></p> <p>15. <i>any potential slope instability problems;</i></p> <p>16. <i>any potential odour, noise and vibration nuisance to neighbours; and</i></p> <p>17. <i>any potential seepage of effluent at ground surface.</i></p> <p><i>The degree to which the non-compliance with the standard allows more efficient, practical and/or pleasant use of the remainder of the site.</i></p> <p><i>The degree to which alternative practical locations are available for the building.</i></p>
<p><b>RPROZ-AM2</b></p> <p><b>Shading of Land and Roads</b></p>	<p><i>Trees on Boundaries</i></p> <p>1. <i>The degree to which planting within the setback area can adversely affect the health of vegetation or stock, or cause a significant increase in the risk of fire.</i></p> <p>2. <i>The degree to which the planting of trees will overshadow adjoining sites and result in reduced sunlight and daylight, and/or result in the loss of productive land.</i></p> <p>3. <i>The degree to which trees may potentially damage structures due to wind fall or root growth.</i></p>



	<p><i>Trees adjoining Public Roads</i></p> <ol style="list-style-type: none"> <li>1. <i>The degree to which planting will cause shading and ice forming on roads in winter, or root damage to the road.</i></li> <li>2. <i>The degree to which trees may potentially cause a road safety risk due to wind fall.</i></li> </ol>
<p><b>RPROZ-AM3</b></p> <p><b><i>Setback for Sensitive Activities from Existing Intensive Primary Production Activities</i></b></p>	<ol style="list-style-type: none"> <li>1. <i>The likelihood of the proposed activity to generate reverse sensitivity effects on the intensive primary production activity and the potential impact these effects may have on the continuing effective and efficient operation of the intensive primary production activity.</i></li> <li>2. <i>The extent to which alternative locations have been considered.</i></li> </ol>

**Appendix F** Letter from Far North District Council

## RFS 4152897 RSE Seasonal Workers Accommodation



**Caution: This message originated from outside CDC, DO NOT click links, open attachments, or follow instructions without validating your trust in the sender first. If unsure, please contact IT.**

Hi Rowena

It might help if you have a look through our Operative District Plan and our Proposed District Plan first to shape your questions.

Our ODP Rural Chapter:

[https://www.fndc.govt.nz/files/assets/public/objectivedocuments/policy-and-planning-pol/district-plan/operative-plan-2009/8-rural-environment-\[a2786294\].pdf](https://www.fndc.govt.nz/files/assets/public/objectivedocuments/policy-and-planning-pol/district-plan/operative-plan-2009/8-rural-environment-[a2786294].pdf)

= 2 Zones, the Rural Production Zone & Rural Living Zone

Our PDP Rural Zones and Special Purpose Zones:

= 4 Rural Zones, Rural production, Rural lifestyle, Rural residential, Settlement + 1 potentially 2 Special Purpose Zones, Horticulture and Horticulture Processing Facilities.

<https://farnorth.isoplan.co.nz/eplan/rules/0/46/0/564/0/64>

(an Eplan so you have to click through)

You would have to check each of these chapters to see if RSE was mentioned.

However, my understanding is we do not have specific rules for RSE accommodation. We have no layers in GIS mapping, unlikely to be a permitted activity under the ODP because depending on what zone it is in it will breach specific rules.

For example in the Rural Production Zone, RSE accommodation is likely to breach residential intensity, scale of activities and potentially rules in the Transportation Chapter as well.

So, we do control RSE accommodation but we don't control it directly through a rule about this accommodation, we catch it in different ways.

Regarding the accredited properties, I believe I sent you the link for the property file team in the previous email. If you don't want to pay, you could try an Official Information Request however those can take some time.

Kind regards,



**Duty Planner**

Far North District Council

09 401 5200 or 24-hour Contact Centre 0800 920 029 | [Duty.Planner@fndc.govt.nz](mailto:Duty.Planner@fndc.govt.nz)

[Website](#) | [Facebook](#) | [LinkedIn](#) | [Careers](#)

## Appendix G Letter from Marlborough District Council



MDC <mdc@marlborough.govt.nz>

To: Rowena Miller



Mon 4/3/2023 1:17 PM

**Caution: This message originated from outside CDC, DO NOT click links, open attachments, or follow instructions without validating your trust in the sender first. If unsure, please contact IT.**

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Good afternoon Rowena,

Thank you for your email,

Please find attached link to our website, this has a bit of information around Seasonal Worker Accommodation.

<https://www.marlborough.govt.nz/our-community/housing/seasonal-workers-accommodation-guidelines>

if you require further information to what is on the guidelines please contact the Duty Planner to advise further

<https://www.marlborough.govt.nz/services/resource-consents/duty-planner-service-information/duty-planner-enquiry-form>

kind regards

**Ashleigh Meadowcroft**  
Customer Service Officer



**MARLBOROUGH  
DISTRICT COUNCIL**



Phone: 03 520 7400

15 Seymour Street, PO Box 443  
Blenheim 7240, New Zealand  
[www.marlborough.govt.nz](http://www.marlborough.govt.nz)

## Appendix H Hastings District Council – Plan Change 1 (Variation 7)

<p><b>Plan Change 1 (Variation 7) - Seasonal Workers Accommodation</b></p> <p>Hastings District Council has prepared a variation to the Proposed District Plan to allow for seasonal worker accommodation within the Light Industrial zone and the General Industrial zones at Omaha and Irongate. The variation also places a more realistic scale for seasonal workers accommodation within the Plains Production zone.</p>	<ul style="list-style-type: none"> <li>• Date Notified: <b>23 August 2019</b></li> <li>• Submissions open: <b>23 August 2019</b></li> <li>• Submissions closed: <b>27 September 2019</b></li> <li>• Date Summary of Submissions Notified: <b>12 October 2019</b></li> <li>• Further submissions closed: <b>29 October 2019</b></li> <li>• Hearing held <b>18 February 2020</b></li> <li>• Decisions Notified <b>2 May 2020</b></li> <li>• Appeal period closed <b>15 June 2020</b></li> <li>• 3 Appeals to the Environment Court have been lodged and mediation is pending.</li> <li>• Appeals settled by way of Consent Order (1 December 2020)</li> <li>• Plan change operative</li> </ul>	<ul style="list-style-type: none"> <li>• Amended Plan Provisions for Variation 7 Seasonal Workers Accommodation <ul style="list-style-type: none"> <li>• <a href="#">14.1 Industrial</a></li> <li>• <a href="#">331.1 Definitions</a></li> <li>• <a href="#">6.2 PPZ</a></li> <li>• <a href="#">7.5 LIZ</a></li> </ul> </li> <li>• <a href="#">Discussion Document</a></li> <li>• <a href="#">Public Notice - Hawke's Bay Today (24.8.2019)</a></li> <li>• <a href="#">Section 32 Evaluation Report Variation 7 Seasonal Worker Accommodation</a></li> <li>• <a href="#">Summary of Submissions</a></li> <li>• <a href="#">Combined Submissions Public Notice - Hawke's Bay Today (12.10.2019)</a></li> <li>• <a href="#">Hearings Committee Recommendations</a></li> <li>• <a href="#">Plan Provisions Amended by Decision</a></li> <li>• <a href="#">Public Notice on Decisions on Submissions (2 May 2020)</a></li> <li>• <a href="#">Section 32AA Evaluation Report</a></li> <li>• <a href="#">Signed Consent Order Documentation</a></li> </ul>
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**Appendix I** Hastings Policies for Seasonal Worker Accommodation in Plains Production Zone

<b>POLICY NUMBER</b>	<b>POLICY NAME</b>	<b>EXPLANATION</b>
<b>POLICY PPP3</b>	<i>Limit the number and scale of buildings (other than those covered by Policy</i>	<i>Explanation There have been a number of instances where buildings have impacted on the versatile land of the Plains</i>

	<p>PPP4) impacting on the versatile soils of the District.</p>	<p>Production Zone as a result of their scale. Some of these buildings are still associated with food production such as those used for intensive rural production activities. These are subject to resource consent with assessment of the effects on the soil resource. While it is beneficial to allow for industrial or commercial activities, or seasonal workers accommodation, that add value to the produce coming off the land it is important that these activities are not allowed to reach such a scale as to impact on the versatile soils that the activity originally relied on at its inception.</p> <p>Note that this policy does not apply to buildings accessory to land based primary production, which are covered by Policy PPP4.</p>
<p><b>POLICY PPP5</b></p>	<p>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.</p>	<p>Seasonal worker accommodation is provided for as a special form of accommodation which is generally considered appropriate in the Plains Production Zone and especially for RSE workers, due to its direct relationship with the management and harvesting of primary produce within the zone, subject to limits on size and assessment of its effects, particularly on versatile soils. Beyond the 80 resident limit the scale of the activity is considered to have more significant effects on the versatile land with building scale and the requirements around on-site servicing.</p> <p><u>Note:</u> Although supplementary residential dwellings are a Permitted activity subject to a specified maximum floor area, it is not appropriate to use them for a permitted baseline comparison for other buildings as they are directly related to the residential use of the site and they cannot be subdivided off as they remain in the curtilage of the main dwelling. Nor should the maximum building footprints for commercial activities be used as permitted baseline for</p>

		<i>supplementary dwellings as commercial activities are stand-alone developments. Similarly, seasonal workers accommodation should not be used as a permitted baseline comparison as they are considered to be of a temporary nature with a requirement that they are relocatable.</i>
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**Appendix J** Excerpt from Resource Consent Application at 3023 State Highway



Marlborough District Council  
15 Seymour Street  
Blenheim 7201  
PO Box 443  
New Zealand

Telephone 00 64 3 520 7400  
Fascimile 00 64 3 520 7496  
Email [mdc@marlborough.govt.nz](mailto:mdc@marlborough.govt.nz)  
Website [www.marlborough.govt.nz](http://www.marlborough.govt.nz)  
GST No. 50-430-960




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Reference Number:	REF161119697
Submitted On:	29/11/2016 16:04
Submitted By:	Remac Consulting Ltd

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## Important Information

This application is made under Section 88 of the Resource Management Act 1991.

Please provide all details relevant to your proposal. Feel free to discuss any aspect of your proposal or the application process with Council's duty planner, who is here to help. Duty planner hours are 9.00 am to 3.00 pm Monday to Friday.

This application will be checked before formal acceptance. If the application is incomplete, we are unable to accept it for processing and it will be returned to you.

If this activity requires more than one consent type, (eg both land use and discharge) you may apply for all within this application.

## Applicant Details

Select as many as are applicable

Is the applicant

Is the applicant

• A company

Company name

ST ANDREWS PROPERTY GROUP LIMITED

Is the applicant

Main applicant name

STAG

Main applicant mailing address

22 Purkis Street , Springlands , Blenheim, 7201

Main applicant email address

richard.olliver@gmail.com

Main contact number

0272511544

Alternative contact number

Not answered

Is there an agent working on behalf of the applicant?

Yes

All communication regarding the application will be sent to the agent

Are you a business or an individual?

Business

Company name

Remac Consulting Ltd

Contact person

Ed Chapman-Cohen

Mailing address

PO Box 169, Blenheim 7240

Email address

ed@remacconsulting.co.nz

Main contact number

03 577 1925

Alternative contact number

027 444 0551

Agent reference

R8204

---

## Application Details

Types of resource consent applied for	<ul style="list-style-type: none"> <li>• Land Use</li> <li>• Water Permit</li> </ul>
---------------------------------------	--

### Property Details

The location to which the application relates is	3023 State Highway 1, Riverlands, Blenheim Including Certificates of Title MB4a/313, MB5c216 and MB5c/217.
--	--

Brief description of the activity	<ul style="list-style-type: none"> <li>•Land Use Activity – to establish more than one residential unit per Certificate of Title on MB4a/313, MB5c216 and MB5c/217 to allow the construction of 24 purpose built residential units on an existing 34 unit motel site to support an integrated accommodation facility for up to 418 recognised seasonal employer (RSE) workers.</li> <li>•Land Use Activity - to undertake a commercial activity in the Rural Zone for the operation of an onsite professional office for worker administration and convenience shop.</li> <li>•Land Use Activity – exceed site coverage in the rural zone by more than 15%.</li> <li>•Land Use Activity – dispensation from car parking standards for an activity required to provide parking for more than 75 vehicles on a site and to provide 60 carparks, requiring a dispensation of 59 carparks.</li> <li>•Land Use Activity – undertake excavations within 8 metres of a stopbank and within a flood hazard zone for installation of non-potable water (including well) and stormwater infrastructure.</li> <li>•Land Use Activity – change of land use within an identified HAIL site under National Environment Statement – Contaminated Soil (2011).</li> <li>•Water Permit - take and use up to 50 cubic metres per day of paoa river surface water for irrigation of amenity plantings, grounds, firefighting and other miscellaneous, non-potable purposes.</li> </ul>
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### Assessment of Effects on the Environment (AEE)

I attach, in accordance with Schedule Four of the Resource Management Act 1991, an assessment of environmental effects in a level of detail that corresponds with the scale and significance of the effects that the proposed activity may have on the environment. (Applications now also have to include consideration of the provisions of the Resource Management Act 1991 and other relevant planning documents)

Please upload Assessment of Effects on the Environment	<ul style="list-style-type: none"> <li>• <a href="#">Appendix 10 - Consultation OPUS - NZTA.pdf(905700 bytes)</a></li> <li>• <a href="#">Appendix 10 - Filenote NZ Police.pdf(234692 bytes)</a></li> <li>• <a href="#">Appendix 10 - letter to Local Iwi - as sent to Ngati Apa, Ngati Rarua, Ngati Toa &amp; Rangitane.pdf(743836 bytes)</a></li> <li>• <a href="#">Appendix 10 - Ngati Toa response.pdf(1120268 bytes)</a></li> <li>• <a href="#">Appendix 2 - Draft Management Plan - 22.11.16.pdf(538471 bytes)</a></li> <li>• <a href="#">Appendix 7 - Correspondance Elec Engineer.pdf(55108 bytes)</a></li> <li>• <a href="#">Appendix 8 - Consultation HNZ &amp; SPAR.pdf(2287194 bytes)</a></li> <li>• <a href="#">STAG Final RCA - 29.11.16.pdf(1200670 bytes)</a></li> </ul>
--	---

### Plans

Please upload plans (e.g. site plan, elevation plans, scheme plan etc) of the locality and activity points. Describe the location in a manner that will allow it to be readily identified, e.g. house number and street address, grid reference, the name of any relevant stream, river, or other water body to which the application may relate, proximity to any well known landmark, DP number, valuation number, property number

Site/location plan	No files uploaded
Scheme plan	No files uploaded
Forest harvest plan	No files uploaded
Building plans	No files uploaded
Dam design drawings	No files uploaded

### Certificate of Title

Certificate(s) of Title and legal documents	• <a href="#">Appendix 3 - CTs - 30.9.16.pdf(257160 bytes)</a>
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## Supplementary Forms

Please indicate which supplementary forms you are adding

### Technical Reports

Do you wish to upload any technical reports to be included in the application by the relevant Resource Management Plan, Act or regulations?

Yes

Benthic report	No files uploaded
Cultural effects assessment	No files uploaded
Dam construction report	No files uploaded
DSI	No files uploaded
Ecology report	No files uploaded
Economic report(s)	No files uploaded
Engineering report	• <a href="#">Appendix 5 - Tech Engineering Design Report - Nov 16.pdf</a> (3666554 bytes)
Erosion and sediment management plan	No files uploaded
Geotechnical report	• <a href="#">Appendix 9 - Smart Alliances Geotech Report - 22.11.16.pdf</a> (4611800 bytes)
Landscape report	• <a href="#">Appendix 1 - Landscape Architect Design - Master Plan - 17.11.16.pdf</a> (11901470 bytes) • <a href="#">Appendix 1a - Unit Elevation &amp; Floor Plan - Preliminary.pdf</a> (195004 bytes)
PSI	• <a href="#">Appendix 6 - SEE Ltd PSI and DSI - Nov 16.pdf</a> (6153469 bytes)
RAP	No files uploaded
Wastewater report	No files uploaded
Any other report not covered in the list above	• <a href="#">Appendix 4 - Opus Traffic Assesment - 9.11.16.pdf</a> (9079610 bytes) • <a href="#">Appendix 4a - Opus Fig 5 indicative entrance layout with dimensions..pdf</a> (583089 bytes)

### Written Approvals

Please provide the names and addresses of the owner and occupier of the land (other than the applicant)

N/A

Please attach any written approval(s) that may have been obtained from affected parties/adjoining property owners and occupiers

No files uploaded

Note: As a matter of good practice and courtesy you should consult your neighbours about your proposal. If you have not consulted your neighbours, please give brief reasons why you have not below

Brief reason for not consulting with neighbours

Not answered

### Other Details

Are additional resource consents required in relation to this proposal?

No

The applicable lodgement (base) fee is to be paid at the time of lodging this application. If payment is made into Council's bank account 02-0600-0202861-02, please record applicant name and either property number or consent type as a reference.

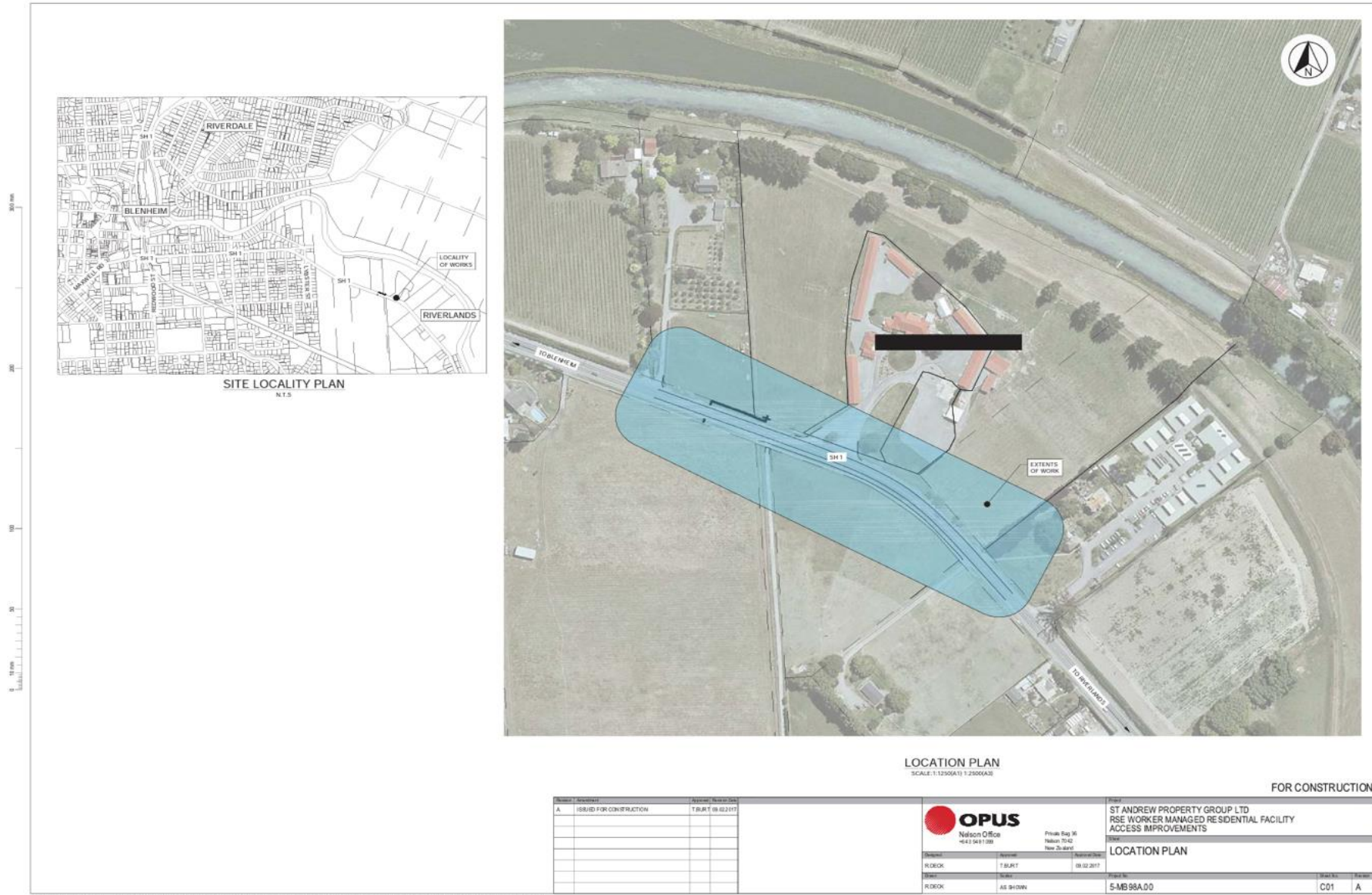
### 3.3 Site Plan

scale. 1:1500 @ A3

- 01. Western screening - 6m wide native shrubs and emergent plant species (see plant schedule for species list). Final species and locations will be in accordance with Agreement R8204.
- 02. Worker managed orchard - mixed species for year round fruiting;
- 03. Resident only sports field - irrigated for year round use;
- 04. Loop track - recreational pedestrian walking track (permeable surface treatment proposed);
- 05. Informal park - open grassed space with mixed deciduous trees (see plant schedule for species list);
- 06. Existing specimen trees and 2.0m(h) fence to be retained;
- 07\*. Office and common social building;
- 08\*. Main carpark (staff, visitors and residents). 32 carparks + 2 x disabled parks;
- 09. Wetland 01;
- 10. Onsite water storage tanks - screened by mixed native plant species;
- 11. Eastern buffer planting - mixed native shrubs and emergent plant species (see plant schedule for species list);
- 12. Carpark (Residents only). 22 parking spaces;
- 13. N/S swale connecting SW between Wetlands 01 & 02;
- 14. 'Linear Park' - a north/south spine comprising a 3m(w) permeable pedestrian path, pedestrian scaled lighting, seating and amenities. Native plantings establish a corridor between the two site wetlands while buffering the residential units;
- 15. Wetland 02;
- 16. Southern boundary planting - physically impermeable mixed native shrubs and emergent species;
- 17. Typical common area - including lawn areas, shade, specimen trees and edible garden spaces;
- 18. East west social spine and resident vehicle lane. Lined with native plantings and a swale system to the southern boundary feeding the site wetlands. Deciduous specimen trees line both sides of the spine/lane;
- 19. Single site entrance (and after-hours gate) for vehicles and pedestrians to maximise passive surveillance (intersection design by others). Rumble strips to calm traffic;
- 20. 10m x 2.8m emergency vehicle layby area.
- 21. 1.8m (h) southern boundary fence;
- 22. Pedestrian and cycle access to existing public path (by others).
- 23. Western boundary fence between will consist of a colour steel fence at a height of 2.0m in a recessive colour. The fence will replace the existing fence between the two properties (as per Agreement Document R8204)
- 24. Existing grassed berm and shrub/tree species.

*The position and configuration of the office / social common building and carpark is indicative only. Any change in position and configuration will not result in a larger building than shown, cause a reduction in available car parking space or provide an increase in residential capacity.*





Issue / Amendment	Approved / Revised Date
A ISSUED FOR CONSTRUCTION	T BLUR T 08.02.2017

**OPUS**  
Nelson Office  
+64 3 941 399

Private Bag 36  
Nelson 7142  
New Zealand

Project: ST ANDREW PROPERTY GROUP LTD  
RSE WORKER MANAGED RESIDENTIAL FACILITY  
ACCESS IMPROVEMENTS

Project No: 5-MB98A.00

Scale: AS 941000

Issue Date: 08.02.2017

Drawn: T BLUR T

Checked: AS 941000

Sheet No: C01

Revision: A

FOR CONSTRUCTION

Original: See A1 (Rev 4) Rev 4: 2017-02-28 at 4:30:46 p.m. Path: \\saw\proj\proj\strat\strat\_r\proj\5-MB98A.00\_0\_Aerial\_R751201\_Technical\210 Drawings\5-MB98A.00-C01\_BASIS\_T8779.dwg C01

**Appendix K** Excerpt from Resource Consent Decision at 3023 State Highway

RMA20180151

**Decision:**

Pursuant to Rule GI16, Rule TP2 and Rule EM9 of the Proposed Hastings District Plan (As Amended by Decisions 12 September 2015), Regulation 11(2) of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protection Human Health, and Sections 104, 104B and 104D of the Resource Management Act 1991, Non-Complying Activity is GRANTED to Skylight Investments Limited to construct and operate a seasonal workers accommodation facility within the General Industrial Zone at 1347 Omahu Road HASTINGS 4120 being LOT 3 DP 425145 (CFR 499263).

**Subject to the Following Conditions:****GENERAL CONDITIONS**

1. That the development proceeds in accordance with the plans and information submitted in the application (HDC Ref: PID 54961#0064, #0065, #0066, #0067, #0074 and #0076), Resource Consent: RMA20180151, application received 13/04/2018 unless otherwise altered by the consent conditions.

**LANDSCAPING & SCREENING PLAN**

2. That prior to works commencing on site the applicant shall submit a finalised landscape plan prepared by a suitably qualified and experienced person for the approval of the Environmental Consents Manager (or nominee). The landscaping plan shall include:
  - planting specifications detailing the specific planting species to achieve a mix of ground cover and specimen trees
  - the number of plants provided, locations, heights/PB sizes, and
  - confirm that the location (distance from the boundary) of the species at planting is appropriate for the species type and leaves sufficient space for ongoing maintenance/trimming from within the site, at the height specified, and
  - Provision for irrigation of landscaping.
3. Plantings shall be undertaken on the site in accordance with the approved landscaping plan within the first planting season following completion of the seasonal workers accommodation facility.
4. That in regard to Conditions 2 and 3 the required landscaping shall be maintained for the duration of the consented activity to the satisfaction of the Environmental Consents Manager (or nominee), Hastings District Council.

**ENGINEERING CONDITIONS**

5. Prior to commencement of any activities authorised by this consent the consent holder shall provide to Council a Services Plan including:
  - a) The legal mechanism or agreement that allows for connection of services across the adjacent land parcel to the 'infrastructure corridor'.
  - b) An assessment of expected water supply, stormwater and wastewater volumes.
  - c) An assessment of the capacity of the 'infrastructure corridor' in relation to the volumes assessed by preceding Condition 5(b).



**Appendix L** Excerpt from Section 42 Planners Report at 36 and 36A Budge Street

## Report Pursuant to Section 42A of the Resource Management Act 1991



<b>FILE NUMBER:</b>	U170970
<b>APPLICANT:</b>	SLAP (Marlborough) Limited (Company No.6304668)
<b>SITE OF APPLICATION:</b>	36 and 36A Budge Street, Riversdale, Blenheim
<b>PROPOSAL:</b>	To establish an integrated accommodation facility for up to 240 Recognised Seasonal Employer (RSE) workers at 36 and 36A Budge Street (a 1.33 hectare site), including: the construction of 10 single storey accommodation buildings and associated car parking, internal roads and paths; a professional office for worker administration; geotechnical strengthening work; a change of land use on an identified HAIL site; and associated landscaping, structures and a stormwater outlet alongside the Ōpaoa River.
<b>COORDINATES:</b>	<b>E</b> 1680236 <b>N</b> 5404784
<b>CONSENT TYPE:</b>	Land Use Consent
<b>LIST OF APPENDICES:</b>	Appendix 1 – Application as notified (page 11) Appendix 2 – Further volunteered conditions (page 213) Appendix 3 – Submissions received (page 218) Appendix 4 – Assets & Services comments (page 263) Appendix 5 – Reserves comments (page 267)
<b>PREAMBLE:</b>	This report has been prepared on the basis of information available on 21 February 2018. It should be emphasised that any conclusions reached or recommendations made in this report are not binding on the decision maker. It should not be assumed that the decision maker will reach the same conclusion or decision having heard all the evidence to be brought before it by the applicant and submitters.

---

### Executive Summary

1. The applicant seeks resource consent to establish an integrated accommodation facility for up to 240 Recognised Seasonal Employer (RSE) workers on 1.33 hectares of residential-zoned land in the Blenheim suburb of Riversdale.
2. The proposal constitutes a discretionary activity in terms of the applicable definitions and rules of the Wairau Awatere Resource Management Plan. As a discretionary activity, Council as the consent authority can decide to either grant or refuse resource consent.
3. The application was publicly notified and twelve submissions were received. One submitter is neutral, two seek conditions, while the remaining nine are opposed to the application. The key issues raised include the need for noise and vibration attenuation

measures in the new buildings; adverse effects on safe and efficient traffic movements; adverse effects on amenity values; and adverse effects on Ōpaoa River wildlife.

4. In this report I provide my summary of the application, submissions and receiving environment, along with an audit of the applicant's assessment of environmental effects. I conclude that the proposal would have some positive and some adverse effects, the latter particularly being on amenity values.
5. In this report I also provide an audit of the applicant's assessment of the proposal against the relevant provisions of the Marlborough Regional Policy Statement, Wairau Awatere Resource Management Plan and proposed Marlborough Environment Plan. I conclude that the proposal is consistent with some and inconsistent with others of the relevant provisions.



**Appendix M** Excerpt from Application at 1347 Omahu Road

<b>LANDUSE CONSENT APPLICATION</b>
------------------------------------

Application Received: 13/04/2018	PID: 54961	RMA20180151
Applicant: Address of Site: Legal Description: Area: Zoning: Proposal: District Plan Provisions: Assessment of Status: NES Provisions: Report Prepared By:	<b><i>Skylight Investments Limited</i></b> 1347 Omaha Road HASTINGS 4120 LOT 3 DP 425145 (CFR 499263) 0.8983 Hectares General Industrial Zone - Proposed Hastings District Plan (September 2015) Proposed Seasonal Worker Accommodation within the General Industrial zone Rule G116, Rule TP2 and Rule EM9 of the Proposed Hastings District Plan (September 2015) Non Complying Activity Regulation 10 (1) of the National Environmental Standard (NES) for Assessing and Managing Contaminants in Soil to protect Human Health Matthew Parker-Bevin	

## 1.0 THE PROPOSAL

The applicant has in summary provided the following description of the proposal:

### **General**

*The Applicant proposes to develop a purpose built Seasonal Worker Accommodation facility for up to a maximum of 166 Recognised Seasonal Employer Scheme (RSE) workers. This involves constructing 6 new purpose-built 367 m<sup>2</sup> accommodation units (accommodating 24 people each) and associated amenity, access and service facilities.*

*This proposal goes a significant way to addressing a shortage in accommodation for RSE workers. It does so in a culturally appropriate and managed way, ensuring that the site provides for many of the needs of the residents.*

*The alternative to what is proposed is workers continuing to utilise existing housing in Hastings and surrounding areas. Houses designed for a nuclear family are being used for much larger numbers of people. This, in turn, creates significant demand for affordable housing which increases costs to the wider community.*

*Use of the facility will be seasonal, based upon the requirements of the industry within which the workers are employed. The highest occupancy rate is likely to be from February through to end of May, although the maximum of 166 persons would not be exceeded.*

RMA20180151



Figure 1: Site Plan

## Appendix N Ethics Application



Form Updated: November 2019

### UNIVERSITY OF OTAGO HUMAN ETHICS COMMITTEE APPLICATION FORM: CATEGORY B

#### (Departmental Approval)

Please ensure you are using the latest application form available from:  
<http://www.otago.ac.nz/council/committees/committees/HumanEthicsCommittees.html>

1. **University of Otago staff member responsible for project:**  
*Thompson-Fawcett, Michelle, Professor*
2. **Department/School:**  
*Geography*
3. **Contact details of staff member responsible (always include your email address):**  
*michelle.thompson-fawcett@otago.co.nz*
4. **Title of project:**  
*Seasonal Workers Accommodation Assessment in Central Otago*

5. **Indicate type of project and names of other investigators and students:**

<b>Staff Research</b>	<input type="checkbox"/>	<b>Names</b>	N/A
<b>Student Research</b>	<input type="checkbox"/>	<b>Names</b>	Emma Stagg, Sarah Copeland, Tina Berg, Nina Lewis, Rowena Arce
<i>Level of Study (e.g. PhD, Masters, Hons)</i>			Masters
<b>Collaboration Institute/Company</b>			Central Otago District Council



**6. When will recruitment and data collection commence?**

19/05/2023

**7. When will data collection be completed?**

5/05/2023

**8. Brief description in lay terms of the aim of the project, and outline of the research questions that will be answered (approx. 200 words):**

This research considers how best to provide for the demand for safe, affordable seasonal worker accommodation in the Central Otago locality that meets the needs of workers and the horticultural industries. This research is expected to assist the Central Otago District Council with the affordability and availability of worker accommodation, which has been an on-going issue in Central Otago. Specifically, this research will focus on the seasonal workers affiliated with the Recognised Seasonal Employers (RSE) scheme that came into effect in 2007. In short, this policy allows the horticultural and viticultural industries to recruit workers from overseas (mostly from Pacific Island countries) for seasonal work when there are not enough New Zealand workers. Therefore, it is crucial to understand the land-use conflicts and their impacts on key stakeholders (RSE workers, the local council, and employers) and the extent to which this shapes the ability of RSE workers to obtain safe and affordable housing. In essence, this research seeks to assist in the development of policies and standards to effectively regulate land use and development to best provide for the demand for safe and affordable seasonal worker accommodation in Central Otago and contribute to the broader literature surrounding the topic of RSE workers access to amenities and services.

**To achieve this research goal, we seek to answer the following research objectives:**

1. To understand what the industry needs for seasonal worker accommodation in Central Otago.
2. To propose options that might alleviate the lack of seasonal worker accommodation, including what policy changes might be required to achieve this action.
3. To look for opportunities for the industry to work together to provide worker accommodations.

9. **Brief description of the method.** Include a description of who the participants are, how the participants will be recruited, and what they will be asked to do and how the data will be used and stored (*Note: if this research involves **patient data or health information** obtained from the Ministry of Health, DHBs etc please refer to the [UOHEC\(H\) Minimal Risk Health Research - Audit and Audit related studies](#)):-*

A mixed-methods approach will be utilised for the purpose of this research exploration. This study will broadly adopt a constructivist approach, which will be implemented via qualitative methods. However, a positivist lens will be applied when attending to quantitative methods.

Semi-structured open-question interviews will be either with a single key informant or with a focus group of up to three key informants. Key informants will comprise the primary method of data collection. Key informants will include employers of RSE workers, RSE workers themselves, accommodation providers, both onsite and offsite, and organisations such as the local council that provide amenities to RSE workers. Participants in the semi-structured interviews will be sourced from community volunteers, either as individuals or as part of a group, and they must be at least 18 years old.

Participant volunteers will be asked a general line of questions concerning the factors that have shaped their experience of obtaining or providing accommodation/ housing, access to public amenities and services, and any other topics the participants regard as relevant to the discussion. Also, where relevant to some key informants, questions will be asked about the conflicting land-use and planning mechanisms provided in the Proposed District Plan that influence the affordability and availability of accommodation in Central Otago.

*Recruitment:*

Participants for both the survey and interview will be recruited via public groups or pages on Facebook for RSE workers or those who support RSE workers in Central Otago. They will also be recruited via publicly available contact information provided on RSE employer websites or the council websites. An information sheet and consent form will be provided if participants wish to volunteer for interviews. The information sheet and consent form will detail the nature of the project, a link to the survey, and an email address for contacting the researchers.

Interview participants will be asked a series of semi-structured questions, based on a schedule of pre-determined themes. Focus groups will be composed of a mix of key informants. Interviews will not exceed 1 hour. Participants will be provided with an information sheet outlining the research aims and objectives,

as well as the purpose and use of any information they will be providing. If they are willing to participate in the research, participants will be given consent forms to sign prior to the interview.

Informed consent is a key aspect of the ethics of interviews, and all participants must accept and be comfortable sharing their ideas with the interviewers. Informed consent will be obtained before the interview takes place. The process of obtaining informed consent will involve presenting the participant with an information sheet, allowing them time to read it, and discuss key points with the researchers. The information sheet will detail the nature of the project, the topics the researchers are interested in, who the participants are, what is being asked of them, and what will happen to the information collected. They will be told that the information they provide may be used in presentations and/or academic assignments, but if they do not wish for their names or anything else that will identify them personally to be used, it will not be used. After they have read and understood the information sheet, participants will be asked to sign a consent form.

The consent form will include an option for interviewees to consent to the audio recording of the interview session via a university-issued Dictaphone. They will be instructed that they are not obligated to answer any questions or lines of questions that they are uncomfortable with. Furthermore, it will be made clear to participants that if they feel uncomfortable with the interview, they can ask for the interview to be discontinued. They will be reassured that there will be no disadvantage to themselves if they choose to do so. The questions and prompts that will be asked are set prior to the interview but will be about several broad themes (see Appendix 1). Consequently, the interview will be more of a conversation on themes that are of interest to or related to the researchers' topic. The researchers will be interested in exploring other themes that may come up in conversation.

All data will be secured on password-protected devices, and sharing of passwords outside of group members is strictly prohibited to secure anonymity. Audio and written records of the interviews will be deleted following the completion of the project. Participants will be asked if they wish to be named; if not, every effort will be made to preserve their anonymity. If the participant would like to attribute their contributions, there will be a section at the end of the consent form where they can give permission to release personal details, such as their name and the organisation or group they are affiliated with.

Participants will be informed that, although the School of Geography is aware of the general themes to be explored in the interviews, it has not been able to review the precise questions that will be asked. Only those listed on this ethics form (students and supervisors) will have access to personal information about participants. This will allow for the analysis of data. No other person will have access, as the data will have password protection. Participants may only access the information that they have personally provided. The

research will be presented in a report that will be published for academic use at the University of Otago and to provide the organisation with an affiliated research organisation.

**9. Disclose and discuss any potential problems and how they will be managed:** (For example: medical/legal problems, issues with disclosure, conflict of interest, safety of the researcher, safeguards to participant anonymity if open access to data is proposed etc)

Participants anonymity will be protected if requested throughout the research process and in the final report document. No personal information from participants will be kept following the completion of research and will not be published in associated publications (unless requested). Participants will not feel pressured to answer questions that may cause discomfort, or they may choose not to answer for any reason. If a participant feels uncomfortable or reluctant to continue, the interview will be stopped immediately upon request. The sample of participants involved in focus groups will be individuals who have expert knowledge, have an individual view, or represent differing perspectives surrounding the project topic.

Prior to the interview, it will be clearly stated that the responses of the participant will be used to produce a report for the Central Otago District Council and the University of Otago. The purpose of this report is to inform the local government of RSE employees' access to affordable housing and broaden the public understanding of this issue. It will be made clear that the report is non-binding nature and the council's has freedom to treat our suggestions however they see fit.

In terms of data collection, the original transcripts will be anonymized by those who do not wish to be identified (i.e., all references to individuals will be removed and replaced with pseudonyms, specifically letters) and stored in a way that only the researchers and supervisor will have access to them. The raw data collected from the research will be stored on a password-protected laptop at the completion of the interviews and will be deleted from the Dictaphone. The data will be kept until the research is completed, unless otherwise advised by staff for a longer duration in publication matters.

Interviews shall be performed in a setting that is agreeable to both the researcher and the interview subjects to ensure their safety. The researchers will respect the differing values and types of knowledge provided by the varied sample of interviewees. Researchers will ensure a sensitive and respectful attitude is present when conducting research.

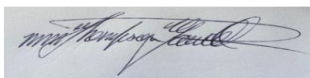
Audiotaping will only occur if the participants have consented to this action, and it will be carried out via a university-issued Dictaphone. Audio recordings and typed transcripts will be stored on password-protected devices only accessible to researchers and the project supervisor. Voluntary consent will be required for all

interview procedures; this will be achieved through the provision of an information sheet that will inform participants about the nature of the research and what information they may be required to provide. Any participant will be able to withdraw at any point, and any data provided will be deleted upon request with no further action or questioning from the researchers. It is acknowledged that members of the research group have no vested interest in the Central Otago area or the RSE scheme and will therefore not interfere with the neutral focus of this research.

No personal details or contact details will be asked of survey participants, and all recorded responses will maintain anonymity and confidentiality. Only those listed on the ethics application will have both the authorization and access to the data on a password-secured computer.

To ensure the safety of the researchers, meetings and interviews will be attended by at least two members of the research project. University IDs will always be worn and displayed in an appropriate manner when engaging with the public to mitigate any potential concerns surrounding research conducted amongst the Central Otago community.

**\*Applicant's Signature:**



**Name (please print):** Michelle Thompson-Fawcett.

**Date:** 20 April 2023

*\*The signatory should be the staff member detailed at Question 1.*

**ACTION TAKEN**

Approved by HOD

Approved by Departmental Ethics Committee

Referred to UO Human Ethics Committee

**Signature of \*\*Head of Department:** *Douglas Hill* .....

**Name of HOD (please print):** Assoc. Prof. Douglas Hill (on deputation) .....

**Date:** 30/04/2023 .....

**\*\*Where the Head of Department is also the Applicant, then an appropriate senior staff member must sign on behalf of the Department or School.**

**Departmental approval:** *I have read this application and believe it to be valid research and ethically sound. I approve the research design. The research proposed in this application is compatible with the University of Otago policies and I give my approval and consent for the application to be forwarded to the University of Otago Human Ethics Committee (to be reported to the next meeting).*

**IMPORTANT NOTE:** As soon as this proposal has been considered and approved at departmental level, the completed form, together with copies of any Information Sheet, Consent Form, recruitment advertisement for participants, and survey or questionnaires should be **emailed as one complete fully-signed PDF to [HECapplications@otago.ac.nz](mailto:HECapplications@otago.ac.nz)**

## **Appendix O** Information Sheet for Participants

[Reference Number: *as allocated upon approval by the Human Ethics Committee*]

[*Date*]



### ***Seasonal Workers Accommodation in Central Otago***

#### ***Information Sheet for Participants***

Thank you for showing an interest in this project. Please read this information sheet carefully before deciding whether to participate. If you decide to participate, we thank you. If you decide not to take part, there will be no disadvantage to you, and we thank you for considering our request.

#### **What is the Aim of the Project?**

The aim of the project is to provide the Central Otago District Council with a report and a set of recommendations that may assist the Council in providing affordable and available housing for Employees of the Recognised Seasonal Employer scheme (RSE workers). This report also aims to provide potential regulatory and non-regulatory options for the Council to consider in relation to improving RSE workers accommodation provisions for the Central Otago area. This project is being undertaken as a requirement for the completion of the Master of Planning degree from the University of Otago and in affiliation with the Central Otago District Council.

#### **What Types of Participants are being sought?**

The research aims to capture the viewpoints of various stakeholders involved in the decision-making process of RSE workers accommodation and the recipients of these decisions. The primary method of data collection will involve key informants, who will be selected from different groups, including employers of RSE workers, RSE workers themselves, accommodation providers (both onsite and offsite), and public officials that provide amenities to RSE workers.

### **What will Participants be asked to do?**

Should you agree to take part in this project, you will be asked to participate in a semi-structured open questioned interview through an individual interview or focus group (interview with up to 2 other participants). You as the participant can decide which method of interview is most appropriate for you. All participants will ask questions pertaining the provision of affordable and available housing for RSE workers in Central Otago. Interviews are expected to span for a duration of 30 minutes and will not exceed 1 hour. The interviews will be recorded on audio devices. If, at any stage, you feel uncomfortable or wish to cease your participation in the research, you can request for the interview and recorded data to be ceased and terminated. The information gathered from a participant will be made available on the participant's request (note this only pertains to evidence given by the participant, no material will be shared between participants without consent of the information provider). Be aware that you may decide to cancel any involvement in the project at any time without further questioning or action.

### **What Data or Information will be collected and what use will be made of it?**

All interviews will be recorded, unless requested not to be and this will be carried out on a university issued Dictaphone. The recordings will be transcribed, and all typed data will be analysed by researchers to record key themes across the entirety of recorded interviews. No personal data will be used for the final report unless specifically requested by the interviewee (e.g., personal names will be substituted with aliases such as participant 1, etc.). Access to recorded data and associated discussions will be strictly limited to group members alongside the listed supervisor.

The results of the interviews and questionnaire will be available to members of the Central Otago District Council through the final report document. Unless requested, no material that



could personally identify participants will be present in the final report. The consent form will provide options for your anonymity. Please be aware that should you wish to, every attempt will be made to preserve your anonymity.

The project will involve semi-structured questions and prompts for both the individual interviews and focus groups. The line-of-questioning will be limited to RSE workers accommodation provisions in Central Otago District Council and how interviewees experiences has been provided for or could be improved in relevant planning document. If questioning develops in a manner that causes discomfort, then participants are reminded of their right to decline to answer and/ or cease the involvement in further research.

### **Can Participants change their mind and withdraw from the project?**

Participants can change their mind and withdraw any contributions to the project before the 30th of May 2023. We ask that they inform either Christina Berg or Michelle Thompson-Fawcett, whose contact details are listed below, in the event of a participant withdrawal.

If you have any questions about our project, either now or in the future, please feel free to contact either:

*Tina Berg and*

Department of Geography

Telephone: 021 172 1688

Email Address: [berti724@otago.ac.nz](mailto:berti724@otago.ac.nz)

*Michelle Thompson-Fawcett*

Department of Geography

Telephone: 03 479 8762

Email Address:

[Michelle.thompson-fawcett@otago.ac.nz](mailto:Michelle.thompson-fawcett@otago.ac.nz)

This study has been approved by the Department stated above. However, if you have any concerns about the ethical conduct of the research you may contact the University of Otago Human Ethics Committee through the Human Ethics Committee Administrator (ph +643 479 8256 or email [gary.witte@otago.ac.nz](mailto:gary.witte@otago.ac.nz)). Any issues you raise will be treated in confidence and investigated and you will be informed of the outcome.



*[Delete any clauses that are not required and ensure the numbering is correct]*

## **Seasonal Workers Accommodation in Central Otago**

### **Information Sheet for Participants**

I have read the Information Sheet concerning this project and understand what it is about. All my questions have been answered to my satisfaction. I understand that I am free to request further information at any stage.

I know that:-

1. My participation in the project is entirely voluntary.
2. I am free to withdraw from the project before its completion (30th May 2023);
3. Personal identifying information specify e.g., audio-tape, will be destroyed at the conclusion of the project but any raw data on which the results of the project depend will be retained in secure storage for at least five years;
4. This project involves an open-questioning technique. The general line of questioning focuses on the provisions of affordable and available housing for RSE workers.
5. The precise nature of the questions that will be asked to have not been determined in advance but will depend on the way in which the interview develops and in the event that the line of questioning develops in such a way that I feel hesitant or uncomfortable I may decline to answer any particular question(s) and/or may withdraw from the project without any disadvantage of any kind.
6. Some sensitive topics and external stresses, may be discussed throughout the study; I understand that I reserve the right to refuse to answer or comment on any question or prompt that makes me uncomfortable or that I wish not to contribute a response.

7. The results of the project may be published and will be used for academic purposes at the University of Otago and be shared with the organisation further insight and improvement purposes to their structure. but every attempt will be made to preserve my anonymity.

I agree to take part in this project.

8. I, as the participant: a) agree to being named in the research,  OR;

b) would rather remain anonymous.]

9. I, as the participant: a) agree to being audio being recording

on a university issued Dictaphone. OR;

b) would rather not be recorded.

10. I, as the participant: a) agree to an individual interview,  OR;

b) would rather be in focus group

c) both interview methods

.....  
(Signature of participant)

.....  
(Date)

.....  
(Printed Name)

**Appendix P** List of Key Informants

Key Informant 1	Employer
Key Informant 2	Accommodation Provider
Key Informant 3	Employer
Key Informant 4	Employer
Key Informant 5	Employer
Key Informant 6	Employer

Key Informant 7	Accommodation Provider
Key Informant 8	Accommodation Provider
Key Informant 9	Central Otago District Council Employee
Key Informant 10	Central Otago District Council Employee
Key Informant 11	Employer
Key Informant 12	Employer
Key Informant 13	Accommodation Provider
Key Informant 14	Accommodation Provider

## **Appendix Q** Semi-Structured Interview Questions

### **For Employers:**

1. How challenging is it to find suitable accommodation for your RSE workers in Central Otago?
2. What types of accommodation do you provide for your RSE workers, and how do you ensure that they meet basic health and safety standards?
3. Have you experienced any difficulties retaining RSE workers due to the availability or quality of accommodation?

4. Are there any restrictions on the number of seasonal workers that can be accommodated?
5. What support would you like to see from local authorities to address the RSE accommodation shortage in Central Otago?
6. Do you think that shared accommodation between seasonal businesses would provide a solution to the increased workers over the peak season?
7. What would be your preferred seasonal worker accommodation

**For Local Authorities:**

1. How would you describe the current state of RSE accommodation in Central Otago?
2. What strategies have been implemented in the past to address the RSE accommodation shortage, and how effective have these strategies been?
3. How do you engage with employers and RSE workers to understand their accommodation needs?
4. How much funding is currently allocated towards addressing the RSE accommodation shortage in Central Otago?
5. What additional support or resources do you need to effectively address the RSE accommodation shortage?
7. What would you think, or do you know of any share-spaces or multi-use spaces shared by multiple businesses for accommodation?
8. What are your thoughts on the effectivity of this?
9. Where would you suggest the best zoning or area for seasonal workers accommodation?
10. Additional thing additional you would like to add?

**Accommodation Provider**

1. What types of accommodation do you provide?
2. How much does that cost for them per night or per week to stay?
3. What do you think are the biggest challenges in providing accommodation during the peak season?

4. Do you have any opinion on who is responsible for accommodation? Do you think it should be the workers or the owner's responsibility in providing worker's accommodation?
5. What are your thoughts on shared spaces or multi-use spaces that could be used by different businesses or orchard owners for accommodation when needed?
6. How many people can you accommodate in the complex? What is your capacity?
7. From your point of view, what would help with the Council for your overall accommodation?



## **Appendix R** Survey Information

Thank you for showing an interest in this project.

### **What is the aim of the project?**

The aim of the project is to provide the Central Otago District Council with a report and a set of recommendations that may assist the Council in providing affordable and available housing for employees and orchard owners.

This project is being undertaken as a requirement for the completion of the Master of Planning degree from the University of Otago and in affiliation with the Central Otago District Council.

### **What types of participants are being sought?**

The research aims to capture the viewpoints of various stakeholders involved in the decision-making process of seasonal workers accommodations and the recipients of these decisions. The primary method of data collection will involve key informants, who will be selected from different groups, including employers of seasonal workers themselves.

**What will participants be asked to do?**

Should you agree to take part in this project, you will be asked to participate in a 5-10 minute survey

**What data or information will be collected, and what use will be made of it?**

Survey responses will be analysed by researchers to identify key themes across the entirety of survey responses. The results of the interviews and questionnaire will be available to members of the Central Otago District Council in the final report document. Unless requested, no material that could

personally identify participants will be included in the final report.

Kia ora!

**Survey questions****What age bracket do you belong to?**

16-20

21-24

**What ethnicity categories do you belong to?**

New Zealand European

Māori

Asian

European

Vanuatu

Tongan

Samoa

**Are you currently an orchard seasonal worker in Central Otago?**

I am currently working in Central Otago

I work most seasons in Central Otago but do not work through the winter months.

I have worked a season in Central Otago in the past 2 years.

**What type of seasonal worker were/are you?**

RSE Worker

Student

Tourist/Travelling

Long-Term/Local Worker

**What type of orchard industry were/are you in?**

Horticulture (mixed)

Apples

Berries

Stone Fruit

**Please select the months you were working or still tend to work in**

(All months listed)

**Which settlement is/was your seasonal worker accommodation closest to?**

(Short Answer)

**What is/was your seasonal worker accommodation situation?**

A tent (onsite)

A van or caravan (onsite)

A cabin (onsite)

A house (onsite)

A camping ground (offsite)

A backpackers (offsite)

Freedom camping (offsite)

Private accommodation (your own house/friends/family)

Renting a private house/room (offsite)

**Where was your seasonal work (orchard) located?**

(Short Answer)

**Where was your seasonal worker accommodation located?**

(Short Answer)

**How much does/did your seasonal accommodation cost every week?**

Free (\$0)

\$0 - \$50

\$50 - \$100

\$100 - \$150

\$200 - \$250

**Did you find it difficult to find accommodation while you were/are a seasonal worker in Central Otago?**

Yes

No

**If you selected yes in question 11, please rank the most important factors that contributed to your difficulty in finding accommodation**

The cost of accommodation

The conditions of accommodation (rules and regulations)

The lack of accommodation options

The comfort of the accommodation (temperature, accessibility)

**Did you find it difficult to find safe accommodation while you were/are a seasonal worker in Central Otago?**

No

Yes

**Did you find it difficult to find affordable accommodation while you were/are a seasonal worker in Central Otago?**

No

Yes

**Please explain this further:**

(Short Answer)

**What is/was your transportation situation (when you were a seasonal worker or still are)**

I have/had my own vehicle.

I am/was given transportation through my employer.

I do/did not have any transportation.

**Was transportation ever an issue for you?**

(Short Answer)

**Please rank the most important qualities you look for in seasonal worker accommodation.**

Comfortability

Physical safety

Sense of community

Transportation provided by the employer

Free/cheap accommodation

Having a private room

Close to the orchard

Close to services and amenities (such as shops and doctors)

**If we missed any important qualities, please suggest them here:**

(Short Answer)

**Please select your preferred accommodation zone**

In the town centre, close to shops

In a residential area

On the orchards (rural area)

**Please explain why you chose this preferred accommodation zone**

(Short Answer)

**Please select your preferred seasonal worker accommodation type**

A tent (onsite)

A van or caravan (onsite)

A cabin (onsite)

A house (onsite)

A camping ground (offsite)

A backpackers (offsite)

Freedom camping (offsite)

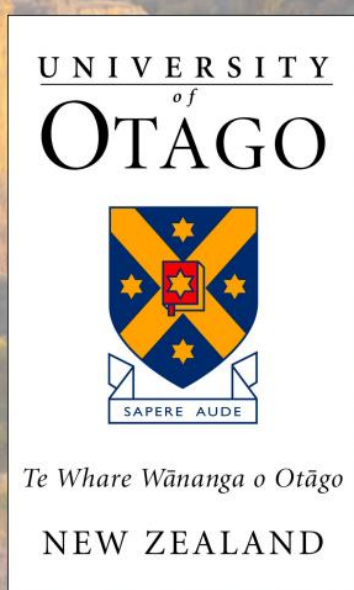
Private accommodation (your own house/friends/family)

Renting a private house/room (offsite)



**Appendix S** Survey Cover

# Are you a seasonal worker in Central Otago?



As part of the Master of Planning course at The University of Otago, we are a group of students undertaking research regarding seasonal worker accommodation in Central Otago. As part of our research, we are looking at seasonal workers viewpoints and experiences in accommodation accessibility, cost and safety.

If you are currently a seasonal horticulture worker in Central Otago or have been in the past 2 years, we would appreciate your input as it is very valuable to our research. This survey will take no more than 5-10 minutes to complete and will include 20 short questions. Please use the QR code below if you are interested or want to read more about the survey.

Employers/Accommodation Providers	Community
Strode Road Orchard Limited	Cromwell Community Notice Board
Johnston's Cottage Orchard and Fruit Stall	Cromwell Connect
Carmen Backyard Consulting	Central Otago Jobs
Remarkable Orchards	Alexandra and Central Otago Jobs NZ
Clyde Orchard Packhouse	Backpacking New Zealand
Horticulture	Fruitpicking Jobs in New Zealand
Dunstan Hills	Farm Work and Fruit Picking Jobs in New Zealand
Pure Pac HR	Queenstown New Zealand Job Opportunities
Central Pac	New Zealand RSE Workers Group
Remarkable Orchard	Fruit Picking Jobs in New Zealand (for Backpackers)
CherriGlobal	Dunedin News
T and G Global	Cromwell Accommodation
Tarras Cherry Corp	Cromwell Accommodation New Zealand
Summerfruit New Zealand	Seasonal Workers Accommodation (facebook page)
Mora Wines	Wanaka Seasonal Accommodation and Work Forum (facebook page)
Cherry Tree Farm	Otago Flattening Goods
Central Otago District Council	Cromwell Job Members Page

Mora Wines	Central Otago Jobs
Parkburn	Roxborough Library
NZ Cherry Corp	Roxborough Supermarket
Cherry Tree Farm	Cromwell Salvation Army
Pure Pac HR	



# **Accommodation Guidelines—Seasonal Workers' Accommodation**

**These guidelines have been developed to remind accommodation providers of their responsibilities to provide and maintain suitable accommodation that is both safe and sanitary for seasonal workers.**

**November 2013**

**Blenheim**  
15 Seymour Street  
PO Box 443  
Blenheim 7240  
Phone 03 520 7400  
Fax 03 520 7496

Email: [mdc@marlborough.govt.nz](mailto:mdc@marlborough.govt.nz)

**Picton**  
67 High Street  
Picton 7220  
Phone 03 520 7493  
Fax 03 520 3203



**MARLBOROUGH  
DISTRICT COUNCIL**

**In consultation with the  
Department of Labour**

## General

Caravans and tents are not suitable for accommodating residents and should not be used.

Neither a garage nor any other non-habitable structure should be used for accommodation. (A property owner / manager proposing to use this type of structure for accommodation must apply for a Building Consent to undertake a "Change of Use". This consent will cover the requirements of Sections 114 and 115 of the Building Act 2004.)

## Construction

- Accommodation should be constructed of sound materials and be fully weatherproof. Inside walls suitably lined and appropriate thermal insulation should be provided. Floors are to be strong, draught proof and adequately covered; and
- New and altered/renovated premises should comply with the current Building Act 2004 and the NZ Building Code.

## Fire Safety

- Complying smoke alarms to meet NZ Building Code Standards should be installed in bedrooms and living areas;
- An escape plan for the household should be prepared and displayed in a communal space; and
- A fire blanket should be provided and made available for immediate use in the kitchen.

## Lighting and Ventilation

- All rooms should be adequately lit by natural and artificial lighting;
- The accommodation building must be adequately ventilated, with openings positioned to assist airflow;
- If possible, rooms should be cross ventilated; and
- Smoking should not be permitted indoors. To maintain clean air, signage indicating that smoking is not permitted should be displayed at each entrance (signage available from Public Health Services).

## Cooking Facilities

The kitchen should be of sufficient size to allow room for food to be prepared. It is satisfactory for the kitchen and the dining room to be contained in the same room. The following requirements should be met:

- There should be at least 1.5 metres of clear floor space on the working side of the cooking stove and sink bench;
- Adequate equipment, utensils and appliances should be provided for cooking purposes;
- Hot water should be provided at the sink;
- Adequate ventilation should be provided in the kitchen and, as a guide, the window space should be at least equal to one tenth of the floor area, and no fewer than half of the windows should be capable of being opened;

- Sufficient cupboard space for storing non-perishable food, utensils and equipment should be provided; and
- No person should be permitted to use the kitchen as a bedroom.

## Refrigeration Arrangements

- A refrigerator and freezer, of adequate capacity for the needs of resident numbers, should be supplied.

## Dining Facilities and Furniture

- There should be sufficient room for residents to eat their meals in reasonable comfort;
- Tables and sufficient seating to accommodate all available residents should be provided;
- Adequate equipment, utensils and appliances should be provided for dining purposes; and
- No person should be permitted to use the dining room as a bedroom.

## Casual Recreational Open Space (e.g. lounge room)

- The accommodation building should provide open space where the residents can relax. This space should provide 6 square metres of floor area for each resident.

## Bedrooms

### *Minimum dimensions for bedrooms and occupants*

Bedrooms should have the following minimum dimensions

- For one person 6 square metres of floor space, 2.4 metres high in any part, 1.8 metres wide in any part;
- For two persons 9 square metres of floor space, 2.4 metres high in any part, 2.1 metres wide in any part;
- For more than two persons, 9 square metres for the first two persons + 4.5 square metres for every extra person - 2.4 metres high in any part, 2.1 metres wide in any part;
- When two or more persons share a bedroom they should be of the same sex (unless otherwise agreed to);
- Bedrooms should be furnished with suitable beds and mattresses, and cupboards or wardrobes for hanging up clothes; and
- A secure location for valuables should be provided.

## Washing Facilities

- Baths or showers should be provided;
- It is recommended that each shower have an attached dressing area;
- Each compartment (the shower area and the dressing area) should have a floor area of at least 1 square metre;
- If separate facilities are not provided for females, the doors should be capable of being locked; and
- Wash hand basins should also be provided and supplied with hot and cold water.

### Laundry Facilities

- For laundering clothes, a washing machine and laundry tub (required by the NZ Building Code) should be provided. There should be a space available to dry clothes adequately.

### Sanitary Conveniences

- A toilet should be provided and capable of being locked;
- One bathroom and one toilet for each 7 persons should be provided;
- When installing such conveniences, they should comply with the NZ Building Code; and
- The occupancy of the dwelling should not exceed the capacity of the on-site wastewater system. The capacity of the system should be checked prior to occupancy.

**Note:** It is the property owners' responsibility to ensure continued maintenance of the on-site effluent disposal system is undertaken at regular intervals to prevent any failure. Any failure will result in the property becoming insanitary and therefore will have to be vacated until such a time as the septic tank is repaired or upgraded.

**Note:** The upgrading of an on-site wastewater system will require a Building Consent.

### Water

- An adequate supply of hot water should be provided for showers, baths, hand-basins, washing clothes and cooking; and
- Clean drinking water should be provided that meets the current NZ Drinking Water Standards.

### Heating

- Some form of heating - either electric, gas (must be flued to outside air), open fire, coal range or space heater (and fuel) - should be provided in at least one room.

**Note:** Portable gas appliances without flues can place up to 5 litres of moisture into the air for each litre of gas burned and are therefore unacceptable.

### Rubbish Disposal

- Rubbish bins with tight-fitting lids should be provided for storing refuse. All refuse should be satisfactorily disposed of so that it does not become a health hazard or create a general nuisance.



