

Please return this form to: info@adc.govt.nz or Ashburton District Council, PO Box 94, Ashburton 7740

Submitter Details

Name:

South Island Seed Dressing & Storage Co Ltd

Postal address:

P.O. Box 404, Ashburton

Home number:

3089958

Work number:

3078383

Mobile number:

0274377847

Email address:

brs@siseed.co.nz

Consent Application

Name of applicant:

Midlands Properties Ltd

Application number:

LUC 25/0001

I/We support this application



I/We oppose this application



The reasons for making my submissions are (please state the nature of your submission and give reasons):

Midlands proposal will centralise their research and operational facilities onto one site and create a flagship for showcasing Mid Canterbury as a world renowned seed research and seed production bowl.

I wish the consent authority to make the following decision (please give details, including the general nature of any conditions sought):

I whole heartedly encourage the Ashburton District Council to approve this Resource Consent Application, given there will be no adverse effects to land or neighbours

I wish to be heard in support of my submission

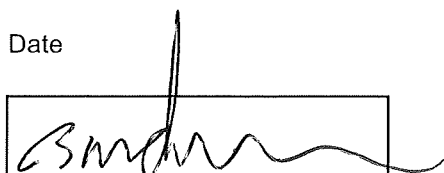


I do not wish to be heard in support of my submission



Signature and Date

Signature:



11-6-2025

Note: The person making this application must send a copy to the applicant as soon as reasonably practicable

Please return this form to: info@adc.govt.nz or Ashburton District Council, PO Box 94, Ashburton 7740

Submitter Details

Name:

Peter Webster

Postal address:

140 Racecourse Road, Ashburton

Home number:

Work number:

Mobile number:

027 436 2629

Email address:

admin

accounts@rhlgroup.co.nz

Consent Application

Name of applicant:

Midlands Properties Ltd.

Application number:

LYC 25/0001

I/We support this application

☒

I/We oppose this application

☐

The reasons for making my submissions are (please state the nature of your submission and give reasons):

This proposal will centralise Midlands operations on one site and make it a facility that more accurately represents its global capability to better represent NZ seed industry, and NZ farmers. The site will do specialty seed + herb trials in a world class facility. The proposal is located in a Rural Zone.

I wish the consent authority to make the following decision (please give details, including the general nature of any conditions sought):

I wish the ADC to approve this Resource Consent Application as a facility with no adverse effects and creates a facility which supports ~~new~~ - key mid Canterbury industry, many local businesses and local farmers.

I wish to be heard in support of my submission

☐

I do not wish to be heard in support of my submission

☒

Signature and Date

Signature:



12/6/2025

Please return this form to: info@adc.govt.nz or Ashburton District Council, PO Box 94, Ashburton 7740

Submitter Details

Name:

Ross Stackhouse

Postal address:

526 Frasers Road, 8 RD Ashburton

Home number:

Work number:

Mobile number:

0274 368248

Email address:

Stackhouseforming@gmail.com

Consent Application

Name of applicant:

Midlands Properties Ltd

Application number:

LYC 25/0001

I/We support this application

☒

I/We oppose this application

☐

The reasons for making my submissions are (please state the nature of your submission and give reasons):

Midlands is an important business in an important industry for mid Canterbury and needs facilities to support this industry. To sell and represent, this industry to global customers needs modern integrated infrastructure like Midlands is proposing. All the community benefits from this industry.

I wish the consent authority to make the following decision (please give details, including the general nature of any conditions sought):

I wish the ADC to approve this Resource Consent Application as what is proposed has no adverse effects and will create a world class facility for viable research + development.

I wish to be heard in support of my submission

☐

I do not wish to be heard in support of my submission

☒

Signature and Date

Signature:

R. W. Stackhouse

Please return this form to: info@adc.govt.nz or Ashburton District Council, PO Box 94, Ashburton 7740

Submitter Details

Name:

Deon Pye

Postal address:

411 Kyle Road, RD 7 Ashburton 7777

Home number:

Work number:

Mobile number:

02743 47902

Email address:

Consent Application

Name of applicant:

Midlands Properties Ltd

Application number:

LUC 25/0001

I/We support this application

☒

I/We oppose this application

☐

The reasons for making my submissions are (please state the nature of your submission and give reasons):

The district plan does not provide anywhere to build the necessary infrastructure to support this region's major industry, what is proposed ensures specialist seed production will continue to develop and provide opportunities for growers, farmers, employees, local business. The facility proposed fits well within the rural zone it is proposed.

I wish the consent authority to make the following decision (please give details, including the general nature of any conditions sought):

I wish the ADC approve the Resource Consent Application as the facility has no adverse effects and offers mid Canterbury a world class specialist seed R+D, production and support facility.

I wish to be heard in support of my submission

☐

I do not wish to be heard in support of my submission

☒

Signature and Date

12/6/25

Signature:



Please return this form to: info@adc.govt.nz or Ashburton District Council, PO Box 94, Ashburton 7740

Submitter Details

Name: Ross Hewson

Postal address: * No 7 RD, Pendarves, Ashburton

Home number: Work number:

Mobile number: 027 221 0995 Email address: r.hewson@xtra.co.nz

Consent Application

Name of applicant: Midlands Properties Ltd

Application number: LUC 25/0001

I/We support this application ☒

I/We oppose this application ☐

The reasons for making my submissions are (please state the nature of your submission and give reasons):

The proposal will enable midlands to better represent the seed industry for mid Canterbury. Benefits are widespread. Farmers, employees, local businesses over NZ as a whole. It will support the specialist seed industry which is unique to mid Canterbury.

I wish the consent authority to make the following decision (please give details, including the general nature of any conditions sought):

I wish the ADC to approve the Resource Consent Application as a facility with no adverse effects at all. It creates a world class facility for enable + research development

I wish to be heard in support of my submission ☒

I do not wish to be heard in support of my submission ☐

Hope to be heard if need be.

Signature and Date 12/6/25.

Signature:

Ross Hewson

Please return this form to: info@adc.govt.nz or Ashburton District Council, PO Box 94, Ashburton 7740

Submitter Details

Name:

BRUCE M. ICROY

Postal address:

309 METREVEN HWY ASHBURTON

Home number:

0272231600

Work number:

Mobile number:

0272231600

Email address:

bruce@bentley-senior.co.nz

Consent Application

Name of applicant:

Midlands Properties Ltd

Application number:

LUC 25/0001

I/We support this application



I/We oppose this application



The reasons for making my submissions are (please state the nature of your submission and give reasons):

This proposal will create a world class facility for arable research and development, supporting our local farming community which is vital for the economy. The investment in infrastructure in mid Canterbury has to be applauded.

I wish the consent authority to make the following decision (please give details, including the general nature of any conditions sought):

We would like Ashburton District Council to approve this consent application as we see no adverse effects on the environment or any negative impact on the local community

I wish to be heard in support of my submission



I do not wish to be heard in support of my submission



Signature and Date

12/6/25

Signature:

B. M. Icro

Please return this form to: info@adc.govt.nz or Ashburton District Council, PO Box 94, Ashburton 7740

Submitter Details

Name:

Rodger Briggs

Postal address:

373 Racecourse Road

Home number:

Work number:

307 9049

Mobile number:

027 515 6644

Email address:

rodger@briggs.co.nz

Consent Application

Name of applicant:

Midland Property Ltd

Application number:

LUC 25/0001

I/We support this application

☒

I/We oppose this application

☐

The reasons for making my submissions are (please state the nature of your submission and give reasons):

This submission is to support the proposal to centralise Midlands operation on the site at Racecourse Road, which will also allow seed and vegetable trials. This will provide support to the greater Mid Canterbury area, and grow the seed and vegetable sector.

I wish the consent authority to make the following decision (please give details, including the general nature of any conditions sought):

I wish the Ashburton District Council to approve this Resource Consent Application as it will have no adverse effect on the area and will provide a world class research and development facility.

I wish to be heard in support of my submission

☐

I do not wish to be heard in support of my submission

☒

Signature and Date

Signature:



16/6/2025

Please return this form to: info@adc.govt.nz or Ashburton District Council, PO Box 94, Ashburton 7740

Submitter Details

Name:	Alister David Argyle		
Postal address:	C/- Argyle Welsh Finnigan, 201-203 West Street, Ashburton		
Home number:		Work number:	03 308 8228
Mobile number:		Email address:	alister.argyle@awlegal.co.nz

Consent Application

Name of applicant:	Midlands Properties Limited
Application number:	LUC25/0001

I/We support this application

The reasons for making my submissions are (please state the nature of your submission and give reasons):

Midlands Properties Limited is the land-owning entity for Midlands Holdings Limited, which has become an internationally renowned grain and seed company.

The proposal is to consolidate the company's operations on the one site which will also enable seed trials for specialty and herbage seeds to be undertaken in close proximity to the company's new laboratory facilities at this location. As the land is zoned rural the site is ideally suited for these activities and will cause only minor effects for neighbours.

I wish the consent authority to make the following decision (please give details, including the general nature of any conditions sought):

The Ashburton District Council approve this Resource Consent Application because the proposed new activity will have minimal effects and will enable the establishment of a world class facility for arable research.

I wish to be heard in support of my submission

Signature and Date

 19/6/25
--

Signature:

Note: The person making this application must send a copy to the applicant as soon as reasonably practicable

Please return this form to: info@adc.govt.nz or Ashburton District Council, PO Box 94, Ashburton 7740

Submitter Details

Name:

TURKEY FARMS - MURRAY & MARGARET TURLEY

Postal address:

380 GUILD ROAD RD 26 TEMUKA

Home number:

03 6159053

Work number:

Mobile number:

0274 342553

Email address:

murray@turkeyfarms.co.nz

Consent Application

Name of applicant:

Midlands Properties Ltd

Application number:

LUC 25/0001

I/We support this application

☒

I/We oppose this application

☐

The reasons for making my submissions are (please state the nature of your submission and give reasons):

This proposal will centralise Midlands Operations on one large site which will include ~~its~~ some seed trial for specially vegetable and herbage seeds. ~~Thus the~~ ~~reasons~~ The proposal is located in a Rural Zone and is one of Mid Canterbury's largest operations of its kind.

I wish the consent authority to make the following decision (please give details, including the general nature of any conditions sought):

I wish the Ashburton District Council to approve this Resource Consent Application as a facility with no adverse effect at ~~its~~ ~~Ashburton / Mid Canterbury~~ ~~or~~ create a World Class facility for arable and research and development.

I wish to be heard in support of my submission

☐

I do not wish to be heard in support of my submission

☐

Signature and Date

Signature:

M.A. Turley

Note: The person making this application must send a copy to the applicant as soon as reasonably practicable

Ashburton District Council
PO Box 94
Ashburton 7740

Attention: Planning Team, Email: info@adc.govt.nz

Applicant: Midlands Properties Ltd, c/- David Harford Consulting Ltd, cc: david@dhconsulting.co.nz

Subject: LUC25/0001 Resource Consent Submission

In response to the public notification of the application of a resource consent we wish to present the following submission.

Introduction

We have perused the application forms provided and generally support the concept for the development of the administration block and associated use of the property to conduct seed and plant trials, display of products produced and other associated matters. However in this instance we wish to be identified as a potential affected party because of aspects that are less than clear within the scope of this application or indeed are particularly unclear with the future use of the area of land already owned by the Applicant Group.

Background.

I have been a beekeeper since 1965. My introduction into beekeeping was along commercial lines working for large and successful beekeeping, honey processing and marketing operations. I have been involved in Beekeeping activities in the Mid Canterbury area since the early 1970's as both an employee of larger business and more recently in a formal partnership with my wife Linda. Our beekeeping business base was originally on the outskirts of Ashburton on a 5 acre block on Smithfield Road. By the early 1990's we realised to develop our business further it was prudent to move further from high density land use to an area of lower density farming use. After doing due diligence including discussion with ADC staff we purchased a 27ha farming block of land in the Greenstreet area. Bee breeding has been conducted on the property ever since. In 2005 we commenced the process of constructing a beekeeping factory and processing plant suitable for use as a commercial beekeeper base and also incorporating a honey processing and packing/marketing facilities.

Because the application does not contain any mention for the use of bees nor has the applicant shared any future plans on the potential or intended use of the land Midlands Properties Ltd own adjacent to the proposed development we seek to be identified as affected persons.

Our honey processing factory and beekeeping base operates on a site that is approximately 600 meters as the bee flies between our property and the applicants group of properties, and within 1km of the property subject to the present consent application. Our landholding is clearly depicted in Figure 3; Location of Application Site (page 4).

Scope of the present consent.

The extent of Midland group's activities may not have been fully disclosed within the scope of the present consent application.

Midlands Group is large and varied as conveyed in the following;

"Midlands is a well-established agricultural producer and suppliers of specialist vegetable and herbage seeds, pulses, oilseeds, cereal grains, and related value-added food ingredients"

Midlands Group also operate a beekeeping business, where they produce value-added food ingredients, which includes bee products and honey derived from their Apiary operation.

It appears the applicant has a far greater purpose for their ownership of the land they currently own which is stated in 1.2 of their Proposal;

“Key to this proposal and one of the reasons for establishment at the proposed location is to create a centralised facility that encompasses the multiple agricultural “arms” of business that Midlands has. Importantly and a substantial part of this is the use of the land for trials and research.”

It would be logical to assume the multiple agricultural “arms” of the business Midlands has could include beekeeping and honey processing and marketing as part of the activities Midlands has for the ultimate use of their properties in this immediate area.

Further information contained in the proposal identifies a ‘flagship’ that is being at the background to the immediate proposal; *“Importantly, there is the need to have a “flagship” facility to demonstrate both nationally and internationally, the activities Midlands undertake and to provide a facility for visitors to come to and appreciate.”*

It would be logical for some speculation to take place how the idea of a flagship might be played out. In the fullness of time it could be considered the investment Midlands Properties has in land in the area could combine some of the value added aspects of their portfolio to provide facilities for not only the processing of seed oils but also the establishment of an extensive bee breeding unit and honey processing facilities.

The resource consent process.

I respect the consenting process creates fairness in the planning process of council whilst allowing those that could be affected to be identified as affected parties.

If this application is for the conduct of seed research not involving the use of bees and the venture identified within the flagship concept does not include future bee breeding or processing of bee products within the total area of land owned by Midlands then I do not feel I need labour the point I make about being an affected party. However it could be assumed the applicant will, ancillary to the production of plants being researched, use bees for pollination of their plants. The scale of proposed bee activity would be of interest to us and our beekeeping operation.

If future activities could include a stand-alone beekeeping operation or honey processing then we consider the activities of the Applicant could severely encroach on the activities of our business. We wish the applicant to be aware if future plans include the establishment of a beekeeping based operation similar to the one we operate then we would become persons affected by the decision of Council in approving the application.

We note the assessment of effects does not cover potential effects of bees within the proposal nor effects the proposed activity may have on existing beekeeping and honey processing in the area. The Management Agency for the American Foulbrood Pest Management Plan notifies beekeepers within a 2km range of any identified case of AFB (a bee disease) to alert potentially affected beekeepers to be aware of the risk of disease transmission. Our operation comes within the 2km range of the applicant’s land the Agency consider significant for the transmission of bee diseases.

Whilst the beekeeping industry does not specifically recognise property rights of the owner of bees within their bees foraging range, the activities of others within the foraging range of bees can affect the health and wellbeing of bees and thus the wellbeing of the owner of the bees.

“Like bees round a honey pot”

Like bees round a honey pot is an old saying that describes a phenomena known by beekeepers as ‘robbing’. Just like blood in water attracts sharks, the odour of honey (from an exposed honey pot) in the air attracts bees. In fact any food source liberated into the environment attracts animals and creatures to feed.

The odour from honey factories and even beehives with a store of honey can attract bees as they forage in the environment. Where odours are strong or where there is an abundant odour more bees will be attracted. At times this bee activity can be intense especially if bees gain access to the source of the odour and a feeding frenzies occurs. In the bee world this is particularly unpleasant to witness as the frenzy turns to all-out war between bees where they fight to the death. Robbing can lead to bee colony deaths, angry bees within the environment and the transmission of bee pests and diseases. The management style of the beekeeper often initiates a ‘robbing’ incidence.

In my beekeeping I have been careful not to have bee sites close to my processing factory however at this time Midlands Apiaries have encroached with hives they own ‘uncomfortably close’ to my beekeeping factory and base. This increases the risk of robbing incidence and bee nuisance within the neighbourhood and transferring the risk of be diseases.

Beekeeping within the (production) environment.

In my 60 years as a beekeeper I have seen many developments and change within the beekeeping industry. In some respects I have become a dinosaur of a time when beekeeping was a craft of gentlemen who developed protocols for their mutual benefit. There have been significant incremental change within an industry some view with apprehension because of the defensive nature of bees combined with the environment beekeepers sometimes force their livestock to endure. My early beekeeping was conducted without the modern conveniences beekeepers of today take for granted. Relative harmony was established within the beekeeping fraternity where there was mutual respect for the assumed property rights of beekeepers within the foraging area of their bees.

I do not wish to change anything within the industry and as we all adapt over time to meet the challenges of the day. It should be noted the beekeeping industry of today is challenged by a number of factors that mesh into each other as the environment of bees is not confined by property lines drawn on a map or fences that confine other farmed livestock.

Beekeeping methods of today involve a beekeeper putting on protective equipment, in some cases because of time constraints racing through beehive manipulations in a manner that ‘stirs the bees up’.

Supplementary feeding is also conducted using man made products that in a lot of cases provide stimulation to colonies at a time that is unnatural for colonies. This can cause robbing within the beehives and lead to instances where bees become nuisance not only to the beekeeper but members of the public. This can be particularly noticeable when the bees are normally idle and there are no floral sources nearby. In some cases bees will also be attracted to the odour of nectar or honey in other beehives or premises that process honey. This not only excites the bees but has them ‘hunting’ for a floral source that does not exist to the extent they sometimes find a source of food in the hives of other bees or a processing factory. This behaviour is also noticeable around other buildings including houses where bees kind of ‘sniff around’ hunting for food. Nearby residents can become alarmed at bee activity around their buildings to the extent beekeepers or Councils field complaints about bee faeces on washing, windows and cars. Of course for some the fear of bees is real and causes distress.

Bees becoming a nuisance has been heightened in the past because of the specialised activities of the beekeeper, honey processor or landowner are far removed from a time when bees were a part of the natural landscape and exist as part of nature within the confines of their natural world.

Whilst the frenzied activities of beekeeping related to the production of Manuka honey do not exist in this region, pollination of crops has become an important factor of beekeeping within this region. Midlands Group are very much involved in both the production of seed, they also provide a significant part of the pollination requirements of the growers. The normal 'gentleman's agreement' when siting beehives in the past no longer apply within beekeeping of today. Beekeepers have become accustomed to placing beehives where they wish disregarding any effect they may have on their neighbouring beekeeper. This has implications for nuisance issues because the density of beehives for pollination services is far more than is sustainable for the welfare of the colonies themselves. As well within high density bee populations promoted by pollination there are further implications for pest and disease management within beehives and the overall sustainability of bees within the environment.

Indeed our bee breeding activities could be considered as 'overstocking' the area we operate but because we take care in the manner we work our bees not to create 'issues' that some associate with beekeeping style adopted by today's beekeepers. For instance a lot of my bee work is conducted without the use of a bee suit or gloves – I consider my stock handling is conducted with an affinity to my bees in a way that has become surpassed in today's beekeeping as conducted by those with a more corporate outlook.

Status of bees/keeping of bees with respect to District Plan.

Beekeeping is accepted primarily as a rural activity. The District Plan appears to concentrate on protecting the wellbeing of the environment and the quality of life within the categories of land ownership. Beekeeping has been accepted as part of this rural environment where most of the complaints Council has received have been considered cases of reverse sensitivity.

During my time as a beekeeper I have worked for commercial beekeeping operations that were once situated in small parcels of rural land on the outskirts of towns. I started with a beekeeping firm that established in 1910 on the outskirts of Leeston. When I started in 1965 residential development had encircled the property with the effect every so often complaints were raised about bee activities with the property despite that no beehives were situated on the immediate area of land surrounding the honey factory.

I later worked for Hunts Honey where the factory was situated in Manse Street, Ashburton. That business received complaints from both neighbours and sometimes the Council regarding 'bee activity' around the factory and surrounding residential properties.

Indeed I am aware Midlands operate their beekeeping base and honey processing factory in the North East Industrial Estate. I wonder at the longer term suitability for the activities that really do not suit an environment that is encroached by intensified development. I surmise that it could be a sound move for the longer term sustainability of Midlands beekeeping business to consider a site where they had control of the area of land surrounding their beekeeping base.

If beekeeping is to feature within the use of the Applicants land for its stated purpose then I believe it is prudent for those within close proximity of the Midlands property to be notified the potential scope and duration of beekeeping activity.

If beekeeping/honey processing are to have a greater feature in the longer term development then I consider there should be discussions between ourselves and the Applicant to address potential effects that both businesses could cause within the environment they both may occupy.

It is important to note land in the rural area occupied by the Applicant is now being increasingly broken up and developed into lifestyle blocks. This will likely continue as farming returns of the land give way to the financial reward offered to landowners make it attractive for the land to transition from rural use to smaller lifestyle blocks bringing with it increased density of properties that may not like a beekeeping operation in the neighbourhood.

Conclusion

The application does not mention the use of bees as ancillary to the use of the land for trial crops, therefore we support the concept of a research facility that operates without introduced bees as pollination agents. The applicant could quite well rely on existing bees (including the ones we own) within the environment for pollination of their trial plots.

We are concerned future development of the total area of land owned by Midlands Properties may be used to bring different arms of the Midlands operation together under some sort of flagship that could include a beekeeping base and honey processing factory.

We wish to be identified as potentially affected party if the development is to incorporate aspects of the beekeeping activities of the Midlands operation into their property which is in close proximity of our existing beekeeping and honey processing business.

We would be willing to meet with the applicant to discuss ways both our businesses could mitigate any adverse effects that may arise if such a development was to take place.

We feel this would be important for both our beekeeping operations as having another beekeeper establish so close to an existing business could affect both businesses in a number of ways.

Recommendation.

We recommend our views be taken into account as beekeeping can become an activity that creates nuisance. If there was to become increased bee activity by another beekeeping business within 2km of our existing business there would likely be an increased risk of nuisance to be caused to a wider group of landowners. There is a potential biosecurity and bee health risk to our bees in such close proximity.

It would be too late and disruptive for both businesses if the council was to become the adjudicator for 'bee issues' if future development prompts an increase in bee issues within the community.

Thank you for considering our submission.

We would like to speak at a hearing should one be held.

Submitted by Roger Bray on behalf of;
Roger & Linda Bray,
Property owners,
Buchans Road,
Ashburton.

Email: birdsnbees@xtra.co.nz

Please return this form to: info@adc.govt.nz or Ashburton District Council, PO Box 94, Ashburton 7740

Submitter Details

Name:	Joanne van Polanen		
Postal address:	446 Racecourse Road, RD 6, Ashburton 7776		
Home number:		Work number:	
Mobile number:	0274 401 539	Email address:	office@farview.co.nz

Consent Application

Name of applicant:	Midlands Properties Limited
Application number:	LUC 25/0001

I/We support this application ☐ I/We oppose this application ☐

The reasons for making my submissions are (please state the nature of your submission and give reasons):

I make this submission as an affected party where the proposal does not comply with standard 10.9.4.

The traffic assessment states that traffic to our property at 448 (dwelling access) and 446 Racecourse Road (farm access) is low and the effect would be minimal.

The traffic assessment does not;

- recognise the vehicle movements associated with our business or
- recognise the impact the positioning of the Midlands entrance will have on the ability to safely make a right turn when there is opposing and following vehicles.

I wish the consent authority to make the following decision (please give details, including the general nature of any conditions sought):

1. Consider the safety of road users when determining mitigations applied to meet standard 10.9.4.
2. Consider moving the entrance to Midlands further north on Racecourse Road

I wish to be heard in support of my submission

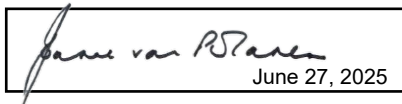


I do not wish to be heard in support of my submission



Signature and Date

Signature:


June 27, 2025

Note: The person making this application must send a copy to the applicant as soon as reasonably practicable

Notice of Submission on an Application for Resource Consent – Ashburton District Council

Submission made by electronic means

1. SUBMITTER DETAILS

Name of Submitter: Canterbury Regional Council

Physical Address: 200 Tuam Street

Postal Address: PO Box 345

Email Address: regional.planning@ecan.govt.nz

Telephone: 027 358 9769

My Address for service for receiving documents and communication about this application is: james.ling@ecan.govt.nz

2. APPLICATION DETAILS

Application Reference Number: LUC25/0001

Name of Applicant: Midlands Property Limited

Application Site Address: The corner of Racecourse Road and the Methven Highway (State Highway 77), legally identified as Lot 1 DP 568166

Description of the Proposed Activity: Resource consent is sought to establish a facility for seed and plant research for agricultural purposes including seed and plant trials, display of products produced, office management and administration, operational storage, site landscaping and vehicle parking.

3. SUBMISSION DETAILS

This is a submission on the application by Midlands Property Limited to Ashburton District Council, to establish a facility for seed and plant research and associated activities.

We submit a neutral submission on this application.

Canterbury Regional Council could not gain an advantage in trade competition through this submission.

The reasons for our submission are:

- 3.1. Canterbury Regional Council are neutral on the application, however, there may be requirements for resource consents under regional plans.

Wastewater

- 3.2. The Applicant proposes to discharge wastewater to land using an onsite treatment system. In their response to the Request for Further Information, they state their intention to comply with the permitted activity criteria under Rule 5.8 of the Canterbury Land and Water Regional Plan (**LWRP**).
- 3.3. While Conditions 2 to 7 of Rule 5.8 appear achievable through appropriate design, Condition 1, regarding the maximum allowable discharge of 2m³ per day, may not be met. The Applicant has not specified the maximum expected wastewater volume but notes that 70 to 100 staff may be present on-site at any one time, with an unspecified number of additional people at certain times of the year.
- 3.4. Given this, it appears likely that the daily discharge volume might exceed 2m³, and therefore a resource consent may be required under Rule 5.9 of the LWRP.

Stormwater

- 3.5. The Applicant proposes to discharge stormwater from roofs to ground, and from hardstand areas to swales. However, no statutory assessment has been completed for the proposed stormwater management and discharge.
- 3.6. Under Rules 5.95 and 5.96 of the LWRP, the discharge of stormwater to surface water or land can be a permitted activity if certain conditions are met. As the detailed design for the proposed discharge has not been provided, it is uncertain whether these conditions will be satisfied.
- 3.7. Notably, Condition 2(d) of Rule 5.96 specifies that stormwater discharges must originate from land used for residential, educational, or rural activities. The term 'rural activities' is not defined in either the LWRP or the Regional Policy Statement (**RPS**), however, the Ashburton District Plan defines it as "*farming activities, intensive farming activities, and forestry activities*".
- 3.8. Based on the Notification Report prepared by the processing planner, the proposed activity does not meet this definition. Therefore, it is likely that the proposal would breach Condition 2(d) of Rule 5.96 and would likely require a discharge consent as a Discretionary Activity under Rule 5.97 of the LWRP.

The decision we would like the Council to make is:

- 3.9. Canterbury Regional Council are neutral on this application, however requests that the Applicant give further consideration to the detailed design of their wastewater and stormwater systems. The Council also encourages the Applicant to engage in a pre-application meeting to determine whether resource consents are required and, if so, to identify the necessary information for any subsequent application.

- 3.10. If resource consent is granted, Canterbury Regional Council seeks that conditions be imposed to ensure any discharge of wastewater or stormwater either complies with the permitted activity requirements under the LWRP or is authorised by a resource consent prior to the commencement of the activity.

4. SUBMISSION AT THE HEARING

We do not wish to be heard in support of our submission.

5. SIGNATURE

Team Leader Planning & Strategy

26 June 2025

A handwritten signature in cursive script that reads "Amanda Thompsen". The signature is written in a dark ink and is positioned below the printed name.

Amanda Thompsen