

**BEFORE A COMMISSIONER APPOINTED BY ASHBURTON DISTRICT
COUNCIL**

UNDER the Resource Management Act 1991 ("RMA")

IN THE MATTER OF An application for a resource consent under section 88 of the RMA by Midland Properties Limited to establish and operate a facility for seed and plant research for agricultural and pastoral purposes including trial plots, storage and laboratory assessment, operational storage, office management and administration, staff and visitor car parking, earthworks and site landscaping at Racecourse Road, Ashburton (Application LUC25/0001)

**EVIDENCE OF DAVID HARFORD
ON BEHALF OF MIDLANDS PROPERTIES LIMITED**

Hearing date: 2 DECEMBER 2025

1. INTRODUCTION, QUALIFICATIONS & EXPERTISE

- 1.1 My name is David Harford. I am an independent Planning Consultant and Director of David Harford Consulting Ltd (DHCL). I have a Bachelor of Resource Studies (Lincoln University), and I am an associate member of the New Zealand Planning Institute ("NZPI"). I have been involved in resource management for both local government and in a private capacity for over 28 years.
- 1.2 In preparing this evidence, although this is not the Environment Court, I acknowledge that I have read the code of conduct for Expert Witnesses in the Environment Court Consolidated Practice Note (2014). I agree to comply with this Code of Conduct. This evidence is within my area of expertise, except where I state I am relying on what another person has told me. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
- 1.3 This evidence is given in support of the application for resource consent lodged with the Ashburton District Council by Midlands Properties Limited ("the applicant").
- 1.4 I am authorised to give this evidence on behalf of the applicant.

2. SCOPE OF EVIDENCE

- 2.1 The applicants engaged me, to prepare and lodge the resource consent application, provide planning advice, and prepare this evidence for the proposed facility on this Rural A zoned site under the Operative Ashburton District Plan.
- 2.2 In preparing this evidence I have read the Officer Report and wish to record that it accurately describes the site location and the nature of the proposed development.
- 2.3 Further, I wish to record that I support and agree with the detail, assessment, and nature of the recommended conditions in the Officer Report except where I provide comments or points of disagreement in this evidence.
- 2.4 My evidence will address the following matters:
 - (a) The existing environment and proposal.
 - (b) Overview and conclusions from the Officer Report and subsequent matters.

- (c) Activity Status.
- (d) Section 104(1)(b)(vi).
- (e) Issues raised in the submissions.
- (f) Officer's Report Recommended Conditions.
- (g) Part II of the RMA, and
- (h) Conclusion.

2.5 I have visited the application site.

3. THE EXISTING ENVIRONMENT AND PROPOSAL

3.1 The planning officer report detailed the existing environment and the proposal in the officer report.

3.2 The officer has commented on the additional information provided post the notification of the application to support the application and provide those matters outlined on page 4 and Appendix 1 of that report.

3.3 The site is a triangular shaped parcel of land within its own Record of Title. The site area is large enough to cater for all of the applicants' requirements and importantly, has the land within this title to enable seed and field trials for various specialty crops to occur. Note too that the applicant owns the small 1453m² lot in the south-west corner where the well is located and 16ha of land on the opposite side of State Highway 77 from the site.

3.4 In terms of the description of the activities that will be undertaken on the site, the planning officer has succinctly detailed the activities in Section 3.1 of his report.

3.5 Specifically, the proposal is a facility to centralise the production and supply of seeds and natural ingredients as part of Midlands Research and Development programmes for the company's existing range of products alongside an extensive product development programme targeting higher quality opportunities nationally and internationally including external research providers being Universities and Government Research Institutes.

3.6 Midlands have several companies that vertically integrate the supply chain, and these include Midlands Seed (New Zealand and Australia), Midlands Nutrition, Midlands Contracting, Midland Farming, Midlands Apiaries, Midlands Bees and Midlands Properties. The applicant's apiary including

honey extraction facility is not proposed for this site as it exists on another site within Ashburton's Business Estate on JB Cullen Drive.

- 3.7 The office and administration facilities keeps the Midlands staff and operations (except honey processing) in one central place. There is no honey production or processing as part of this proposal. There may however be bee keeping undertaken on the site from time to time as required but that is a permitted farming activity.
- 3.8 The office and administration aspects of the proposal are important to centralising the whole facility as opposed to the current situation where there is a main office in Ashburton now but there is no land area for the field and seed trials, and the new facility will be a purpose build and layout. As I detailed in the application, Midlands is a world leader in seed research and development and as such wishes to develop this facility as a high-quality facility which will attract visitors and clients to the site. Midlands Management and staff often visit overseas facilities where the type of facilities they visit are similar too or larger than this proposal so it's the applicants wish to provide a well-designed and functional world class facility.
- 3.9 There will be internal display of the products produced within the building which includes nutritional and health related products however there are no direct retail sales to the public from this site.
- 3.10 The operational storage will include equipment and machinery and some vehicles required for the ongoing farm maintenance and site management for this site and other owned and/or managed by the applicant.
- 3.11 As shown on the plans and details prepared by RMM Landscape Architecture, the site layout and building position includes a well landscaped site with planted and grassed areas and stormwater management to compliment the site appearance and provide screening and mitigation for the site for the car parking, accessways and for amenity purposes.
- 3.12 As detailed in the additional information provided as part of the application, an entranceway upgrade on Racecourse Road has been provided for the purpose and safe access and egress on this 100km/hr section of Racecourse Road. An image of that design is included as Appendix 1 of the planning officer report.

4. OVERVIEW & CONCLUSIONS FROM THE OFFICER REPORT AND SUBSEQUENT MATTERS

- 4.1 For most part I can agree with the discussion and comments in the officer report. There are some points to clarify and/or disagree on.
- 4.2 The planning officer overall found the effects of the proposed activity will be more than minor but comments that there are positive effects.
- 4.3 I of course agree that there are positive effects for this proposal and in terms of the more than minor effects my reading of the officer report is that was finely balanced in that one of the main reasons for the more than minor conclusion, is that amenity and visual effects of the buildings and car parking within the rural site, creates that effect.
- 4.4 I can understand that yes, this is a change to the landscape but would emphasise that the buildings position is well setback from the road, the buildings are mixed in scale and not a contiguous linear shape, there will be a large landscaped area about the buildings which will include vegetation being trees and shrubs, which in time will only improve amenity and visual effects. This is in addition to the existing shelter on the Racecourse and State Highway 77 boundaries of the site.
- 4.5 The actual percentage of building coverage across the site is low for the scale of the site and supporting the level of rural amenity and site openness, which is a key criteria for the rural zone, is over 62% of the site area will be utilised for seed trial and plots and land not in building or access, being grassed or in amenity vegetation.
- 4.6 The balance of the site is access and car parking alongside the planted and grassed areas so in my opinion, the overall appearance in time will be like a large park like setting when one enters the site. It could be likened in part to a small vineyard with cellar door facility such as a restaurant and wine tasting type setting if you like where you drive into the site and there is car parking area beside the buildings with usually some grassed or amenity space and the rest of the site is grape vines. In the case of this site, it is trial plots, but the balance of the site is open in its appearance.
- 4.7 The detailed assessment the planning officer provides for the planning status in Section 4.1 of the officer report, where the overall definition of the application falls to be both a farming and commercial activity, I can agree with. The nature of District Plan definitions is that there is often "cross-over"

of activities and definitions and one must get to the closest definition(s) relevant to the activity.

- 4.8 The assessment of non-compliances addressed for the activities on the site is succinctly detailed and is consistent with how the application and additional information was assessed and provided to the Council.
- 4.9 The overall status of the application, due to the office and administration aspects, falls to be a non-complying activity under the District Plan.
- 4.10 Under 6.2.2 Permitted Baseline Assessment, I agree with the findings that the use of the property for farming activities is permitted and the group visits to the site. The primary use of the site is the farming through the trial plots and crops and at times there will be group visits to the site.
- 4.11 The focus is on the commercial elements which are the office and administration aspects of the facility which are the secondary or supporting activities to the proposal.
- 4.12 I can agree that the use of the site and built form will be different to what exists in the general locality albeit this area is not too distant from the Ashburton Town boundary which is recognised that the site is in a Rural A or hinterland zone as opposed to the predominant Rural B zone.
- 4.13 The buildings are commercial in appearance, but they are not so large that they are predominant large features in the wider landscape, The car parking area has been designed as being partly blending into the proposed site landscaping.
- 4.14 The comments that passersby and local neighbours will experience a different amenity from what could be expected in the local area. That is true in terms of the proposed site use as Midlands main administration and operations facility. The question is what the extent of that effect is. Once the site is established, other than vehicle movements into and out of the site, and the establishment of new vegetation to complement existing boundary planting, the facility will become part of the formed environment. In my view, you could have farm buildings on the site with various permitted farming uses where activities occur throughout the day and night, which arguably might have more of a noticeable effect such as noise, than this proposal is likely to have.
- 4.15 I note the planning officer points out that no party has submitted in opposition to potential adverse effects on amenity and character. Being a publicly

notified application, that is a significant matter and its clear this was not a matter the public at large had any concern about.

- 4.16 Regarding noise as discussed as part of 6.2.3, I agree that the effects of noise from this proposal would be less than minor. The potential for effects from noise on the neighbour to the south (Briggs – Lot 4 DP 439991), would seem very low as this would be limited to vehicle engines starts, car door shutting and general vehicle movements. The Briggs were a submitter in support of the application, and if noise was an issue, this would have been raised in the submission.
- 4.17 The two neighbours mentioned regarding vehicle noise is noted. There will be vehicle movements into and out of the site onto and from Racecourse Road which may have some effect on those neighbours albeit it is intermittent and for the administration and office related activities, during daytime hours. The provision of earthbundling may help reduce noise internally from vehicles but it will be at the road crossing and entry/exit via the upgraded entranceway where most noise would be heard. However, that is not considered a significant matter in terms of the majority of vehicles being smaller and the entry and exit from the site will be at low speed.
- 4.18 With regards to the transport comments, it can be agreed that the traffic effects will be suitably managed and the conditions proposed are acceptable. The traffic engineer has made comments with regards to the site traffic movements and mitigation in her evidence.
- 4.19 Investigation for the servicing of the site for the three waters (wastewater, water supply and stormwater) has been investigated by both E2 Environmental and Aqualinc. The findings are that wastewater in terms of domestic effluent for the office and ablution facilities could comply with the maximum daily volume of 2m³ and meet the groundwater separation distances in terms of distances to bores, the depth of groundwater at the site and surface water setbacks. The site exceeds a minimum density of 4ha so that is no issue. If a discharge consent is required namely around volumes, this will be applied for from Environment Canterbury.
- 4.20 On site stormwater management for both roof water and hardstand areas will be designed in accordance with best practice and a resource consent from Environment Canterbury will be sought for the operational phase discharge to land.

- 4.21 In terms of a water supply, Aqualinc provided detailed advice with regards to the options for drinking water supply. Some recommendations were made with regards to water quality from the existing bore serving the site and the ability to seek consent to take water from this bore for office or domestic purposes. Essentially, there are options for a water supply.
- 4.22 The commercial aspect for this proposal is the head office and administration functions being established and operated from the site. I concur with the planning officer's comments that the head office establishment is in combination with activities directly related to the office activities and the necessity to be close to the permitted agricultural activities and centralising of all the activities, is the sought requirement.
- 4.23 The last paragraph under "Commercial Effects, raised a point that has a "precedent effect" type of consideration. That is, if other activities similar to the proposed were to establish in rural areas there would be a fragmentation of the existing commercial areas within Ashburton. *Doing this is likely to lead to more than minor effects on the commercial fabric of Ashburton.*
- 4.24 I think Midlands as an operation has a special characteristic and quality about what they do, that does not create a precedent or more than minor effects. They are a primary activity specialising in seed research, trials and production alongside the supporting businesses being the contracting, farming and honey facility (off site) that warrants this facility being away from a commercial zone. Being part of a world class research facility warrants the administration and office functions to be part of the rural based facility. Noteworthy too is that while there are management and administration staff, a number of the staff are specialists in agronomy, research, field advisors and the like so for several of the staff, they are out of office some of time and therefore being within Central Ashburton is not an advantage in that regard.
- 4.25 There are few other seed and research businesses or facilities of the scale of the applicant, that would be seeking to establish and operate in rural zones and undertake the level of expenditure to create a facility the type proposed by the applicant. The applicant owns this site and land opposite as well for rural purposes, so I don't consider it's a situation where this type of proposal is likely to be replicated by others easily.
- 4.26 Ashburton District is a large area and there are other various agricultural businesses such as seed cleaners, rural contractors etc that existing in rural zones, and whilst they would be defined as a Rural Servicing Activities in the

District Plan and full discretionary, still have administration, office and commercial aspects to the business. So, the point being, agricultural, pastoral or similar related activities often have some form of commercial aspect on the site ancillary and necessary for the activity. To that end, the effects may be minor but a stretch to go to more than minor. I do appreciate the planning officer's discussion and thinking around the positive aspects of this proposal.

- 4.27 The effects on the Class 2 High production soils have been discussed and indeed, the applicant has provided an agricultural report in support of this. From the planning perspective, I agree with the planning officer that the activity will continue productive use of a large part of the site, and it will be the primary use of the site. Whilst the buildings and car parking and soe grassed/landscaped areas will feature, this is no different to a farm with yards, sheds, housing and other non-productive use that is part of the farm environment. For this proposal, trial cropping and seed research will feature over the site and as detailed in the officers' report, the proposal is a supporting activity and would meet the exceptions within the National Policy Statement High Production Land (NPS HPL).
- 4.28 On page 18, the matter of bees was raised. I comment on the matters raised in the submission by the Brays below. I note the comment around trade competition mentioned by the planning officer, and I see how those comments could be likened to that.
- 4.29 The more interesting aspect is the matter around property rights where bees foraging ranges and flight paths so to speak, are concerned. Beekeeping within the rural zones of this District is a permitted farming activity and I agree, there are no controls, limits or otherwise under the District Plan. There is a bylaw for beekeeping but that relates to management for nuisance caused to other persons and if the hive is considered dangerous, offensive or there is a risk of injury.
- 4.30 I will not comment on the importance of beekeeping in terms of pollination, as that is a given and essential.
- 4.31 There is no proposal to establish a honey processing facility on this site. The applicant has such a site in the Ashburton Business Estate on JB Cullen Drive.

- 4.32 The positive effects statement from the planning officer on page 19 is agreed. There would be significant positive effects to the district and wider region, as detailed in the application, from this proposal.
- 4.33 The summary statement on page 19 found that in consideration of the effects on the environment, there could be more than minor effects. This is linked to the commercial aspects of the facility. I don't consider the effects would be more than minor overall, perhaps minor when considered on balance and thinking in relation to rural service activities or the like, that have administrative, office or commercial aspects to them, and I agree that several other effects of the proposal will be at most minor and likely less than minor with significant positive effects arising.
- 4.34 Supporting this of course is that there are no submissions that relate to the amenity, character or changes to the rural environment from this site.

5. ACTIVITY STATUS

- 5.1 As discussed in the Assessment of Effects and Planning Officer Report, under the Operative District Plan, the proposal is a non-complying activity.
- 5.2 Section 104B of the Resource Management Act 1991 (RMA) directs, in relation to discretionary or non-complying activities, as follows:

104B Determination of applications for discretionary or non-complying activities

After considering an application for a resource consent for a discretionary activity or non-complying activity, a consent authority—

- (a) may grant or refuse the application; and*
- (b) if it grants the application, may impose conditions under section 108.*

- 5.3 Section 104D includes restrictions for non-complying activities. Specifically,
- (1) *Despite any decision made for the purpose of notification in relation to adverse effects, a consent authority may grant a resource consent for a non-complying activity only if it is satisfied that either—*
- (a) the adverse effects of the activity on the environment (other than any effect to which [section 104\(3\)\(a\)\(ii\)](#) applies) will be minor; or*
 - (b) the application is for an activity that will not be contrary to the objectives and policies of—*

- (i) *the relevant plan, if there is a plan but no proposed plan in respect of the activity; or*
 - (ii) *the relevant proposed plan, if there is a proposed plan but no relevant plan in respect of the activity; or*
 - (iii) *both the relevant plan and the relevant proposed plan, if there is both a plan and a proposed plan in respect of the activity.*
- (2) *To avoid doubt, [section 104\(2\)](#) applies to the determination of an application for a non-complying activity.*

5.4 The application and officer report provides a high level of assessment in terms of the potential effects. The application was supported by detailed concept plans including a landscape plan from Rough Milne Mitchell Landscaping Ltd and a traffic assessment report from Novo Group Ltd and

6. SECTION 104(1) (B)(III)

6.1 The National Policy Statement for High Production Land (NPS-HPL) was addressed in the report. The land is classed as having LUC Class 2 soils.

6.2 I agree with the planning officer's assessment of clause 3.9 where the land not directly used for land based primary production, has been addressed. Clause 3.9(2)(a) provides an exception for supporting activities over the land. For this proposal the primary function of seed growing and research for trials and farming management of the same alongside subsequent lab analysis, storage and testing, is the primary function of the facility whilst the secondary and ancillary use, is head office and administration aspects. The buildings, access, landscaped and parking areas are not a large scale and therefore meets the exception under 3.9 (2).

6.3 Clause 3.9.(3) is at a scale that the activity does not impact the long-term use of the soil and the soil loss is minimised.

6.4 This isn't a proposal that creates any reverse sensitivity effects on local existing land based primary production.

7. SECTION 104(1) (B)(V)

7.1 It is agreed that the proposal is not contrary to the relevant provisions of the Canterbury Regional Policy Statement (CRPS). No further assessment is required.

8. SECTION 104(1) (B)(VI)

- 8.1 The assessment of the relevant objectives and policies was addressed in the application and in detail by the planning officer.
- 8.2 In terms of the relevant objectives and policies of the Operative District Plan assessed by the planning officer.
- 8.3 The relevant *Objective 3.1 Rural Primary Production* and subsequent policies 3.1A-E were addressed.
- 8.4 The proposal is not considered a non-rural activity due to the primary use of the site, and the hard surfaces and buildings sought for the proposal are only those needed for the proposal to enable it to function as intended.
- 8.5 Much of the site is to be used for production, and the collection of activities makes the proposal predominantly rural in nature as opposed to business or residential. Therefore, it is agreed the proposal is consistent with this objective and supporting policies.
- 8.6 *Objective 3.5: Rural Character and Amenity*, and the supporting policies listed on pages 24 and 25 of the officer report, the objective seeks to protect and maintain the character and amenity of rural areas, but provision is made for non-rural activities that meet the needs of local and regional communities and the nation. I agree that the proposal will service and meet the needs of the region and nation.
- 8.7 The policies include that the proposal will maintain clear distinctions between urban and rural areas and not lead to the dispersal of residential activities, adverse effects of the activity will be managed, and lighting can be controlled. The earlier assessment of character and amenity effects raised that the effects are more than minor due to the change in appearance of the open rural site and more commercial as opposed to rural buildings however under Policy 3.5E, the proposal is not opposed to such an extent that it is contrary to it.
- 8.8 For the above reasons it is considered that the proposed activity is consistent with the above objectives and policies.

9. ISSUES RAISED IN THE SUBMISSIONS

- 9.1 There were twelve submissions received on the proposal. The planning officer provides the summary of submissions within his report.

- 9.2 The supporting submissions (9) all raise similar positive effects for the proposal, namely centralising the research and operations for Midlands and create a world class facility.
- 9.3 The submission from Environment Canterbury was neutral and raised points related to the likelihood of consents required for wastewater and stormwater over the site. Those matters were discussed earlier in this evidence and any consents required, will be sought. The expert assessment or comments on those matters, were that matters around wastewater and stormwater (operational phase), can be addressed as part of the proposal and any consents required will be obtained.
- 9.4 The submission from J Van Polanen relates to traffic and specifically the positioning of the Midlands entrance to the site. In particular was the ability to make a right turn into the submitters property where vehicles are approaching or following. The applicant had discussed matters with the submitter and what has occurred since the receipt of the submission is that an upgraded entranceway from Racecourse Road into the site has been designed. This includes widening and tapering to enable safer turning into and out of the site. The traffic engineer from Novo Group provides further comment on this matter in evidence.
- 9.5 The submission from Roger and Linda Bray raises some interesting comments around the use of bees with possibility for a bee breeding unit and honey processing facility.
- 9.6 The submitter is generally in support of the proposal, but comment needs to be made on these matters.
- 9.7 There is no proposal here for any honey processing or apiary facility at this site. The applicant has a well-established facility at JB Cullen Drive for honey processing.
- 9.8 There is a possible situation of trade competition raised here (as I understand this is what the Planning Officer was referring too) where if there was to be a bee keeping operation, then these activities could encroach into the activities of the submitters business nearby in Greenstreet.
- 9.9 The other matter which as it relates to District Planning, is there will be bees placed on the site as required for pollination and any ancillary beekeeping activities which is permitted as a farming activity under the Ashburton District Plan. The submitters concern regarding Midlands Apiaries having

encroached the submitters beekeeping factory and base therefore increasing the risk of “*robbing incidence*” and been a nuisance within the area and transferring the risk of diseases. These are matters that relate to biosecurity in my view, administered by the Ministry for Primary Industries (MPI) and the applicant would be doing all it can to comply in that regard as it is in their own interests to do so.

- 9.10 In my opinion, I am not certain we can delve into this further from a District Planning or resource management perspective, as the relevant documents being the District Plan and the Canterbury Regional Policy Statement do not expressly deal with beekeeping in rural zones. I can’t speak for other District Plans but in Ashburton case, this would be captured as a farming activity as it is the *use of land and buildings for the primary purpose of the production of vegetative matter...* The use of bees for pollination of crops would fit within the definition or at least I would suggest it is intended to fit as it is such a critical part of vegetative management and production.
- 9.11 In the case of native bees, there may be provision under the National Policy Statement Indigenous Biodiversity (NPSIB), that provides protection and maintenance of that livestock however for this proposal, there is no issue as to affecting native bees nor is there honey processing.
- 9.12 Other comments on those submission points have been addressed in the officer report.

10. OFFICERS REPORT RECOMMENDED CONDITIONS

10.1 The proposed conditions recommended in 7.2 are agreed except where I comment as follows.

10.2 Proposed condition 2, hours of operation says,

Hours of Operation

2. Hours of operation for the following activities shall be limited to 8.00am to 5.00pm

Monday to Friday:

- *Office administration*
- *Visitor demonstrations, meetings and tours; and*
- *Operation of the head office building.*

- 10.3 The comment I wish to make here is some office staff do arrive on site to the building around 7am during busy periods and internally from time to time, nighttime phone calls and/or online meetings or the like will be undertaken on-site particularly where international phone calls or online meetings are required due to differing time zones. This is on an intermittent basis and does not involve many staff members.
- 10.4 I request some provision be made for this in the condition. This may state ... during the months of September through to March, staff may access the site by 7am to 10pm in relation to office administration and head office functions. There would be no group visits or tours outside of 8am to 5pm.
- 10.5 The only other matter is Advice Note 2, that refers to the no building over the pipeline, which is a given however if the applicant is not working on or near the easement, is it still a requirement to seek written approval from the requiring authority? Is there some clarity around that.

11. PART II OF THE RMA

Section 5

- 11.1 *Section 5 outlines the purpose of the Act as follows:*
- (1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.*
 - (2) *In this Act, "sustainable management" means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while:*
 - (a) *Sustaining the potential of natural and physical resources (excluding minerals) to meet the foreseeable needs of future generations; and*
 - (b) *Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
 - (c) *Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*
- 11.2 The proposal has considered all relevant matters and the positive aspects of the development from an economic, social, and cultural perspective will outweigh any detrimental impact upon the surrounding land, and particularly

the Rural A zone. Therefore, it is considered that the proposed development achieves this purpose by avoiding, remedying, or mitigating any adverse effects.

11.3 Accordingly, the proposal will achieve the purpose of Section 5 of the RMA

Section 7

11.4 Section 7 outlines other matters that need to be considered. Matters of relevance are:

(c) *The maintenance and enhancement of amenity values.*

(f) *Maintenance and enhancement of the quality of the environment.*

11.5 Section 7(c) and (f) of the Act are matters to which Consent Authorities should give regard to when making informed decisions. When assessing a non-complying land use consent application in the Rural A zone, consideration may be given to the effects on amenity values and maintenance and enhancement of the quality of the environment because of the proposed activity.

11.6 The proposal is consistent with these Part II matters.

12. CONCLUSION

12.1 Overall, I consider that any effects of the proposal on the environment can be avoided or mitigated and can be adequately addressed through the proposed conditions. I concur with the planning officer that there are positive effects created by this proposal and that the proposal is not inconsistent with the relevant objectives and policies for the District Plan.

12.1 I therefore consider that the application would meet the sustainable management purpose of the RMA and can be approved.

David Harford

A handwritten signature in black ink, appearing to read 'D Harford', written in a cursive style.

18th November 2025