

Ashburton District Council

Via email: stewart.Fletcher@adc.govt.nz

26th February 2025

Dear Stewart,

**RE: LUC250001 - RESPONSE TO RFI MATTERS – PROPOSED MIDLANDS PROPERTIES –
ADMINISTRATION/OFFICE AND SEED TRIAL FACILITY – RACECOURSE ROAD, ASHBURTON**

In response to the further information request you sent through, and the site visit undertaken recently.

1. The proposed activity is a mix of all those matters raised in No 1 of your request. It is proposed to be the main or head office for Midlands's so will include administration, management, and office functions for all of their key seed trial activities. Visitors from overseas and domestically are a key part of Midlands communication and relationship building so having a facility that performs that function is important.

Included as part of this is the seed trial areas for research and development on the site and other sites owned and/or managed by Midlands and bee production activities which are essential for pollination activity.

A campus was used to describe the overall facility however its confusing the use of the facility in terms of research and development.

2. In addition to the plans submitted with the application please see attached additional plans prepared by RMM which provides a concept package for the building design for the Administrative and Field Office block. Note that a permitted farm building such as a 4-bay shed may be building in time that is associated with the seed crops for management and harvest of the same. A specific area has not been identified for this yet but likely to be near to the seed growing plots and close to the internal access road for ease of logistics.
3. Please refer to the plans as referred to and provided in 2 above.
4. A site plan with a chart for the proposed earthworks for cut and fill calculations is provided and attached. Based on the predictions for cut and fill, both combined will exceed the 5000m³ volume over the entire site. Most if not all that earth will be utilised for the low mounding shown on the earthworks plan between the trees on the Racecourse Road frontage.
5. This will be post and wire fencing standing between 1.2m – 1.5m high and where possible, existing fencing will be retained.
6. The proposed signage will be a signage wall at or about area 1 on the earthworks plans. This will be on a schist or similar type rock wall and state "Midlands" or "Midlands Agricultural Park" or similar.



Example stone signage at entrance

This proposed sign will not exceed an area of 2m². A service entry only sign will be erected at gate 16. This will be a small sign and will not exceed 0.6m². Internal signage labelled car parking and names on buildings will be attached to the buildings or small signs about the site which is normal practice for administrative buildings. Collectively about the internal site this will not exceed say 2m² in total.

7. At this time all that is happening on the opposite side of the State Highway is the proposed formation of an access driveway from State Highway 77 however this is to be to the farming activities that will occur on that land. Consultation with NZTA has been undertaken with regards to the driveway and vehicle crossing formation into this land. There is no proposal to put administration or storage buildings on that site currently. There may be a farm storage building erected upon there in time.
8. The proposal being a mix of farming, administration and office including field office building plus lab environment for storage of seed in a controlled environment which is ancillary to the seed trials occurring on the site. There are element of different activities occurring and hence the finding of any other activity and this would include office activities which in turn links to administration and head office facilities which are commercial. The difficulty is the Midlands Group primary activity include seed trial and production, research which like any Agri business, has a commercial function. So, in terms in reaching one type of definition there is an element of commercial as well as farming for research purposes. So, it could well be Council find this is an Agri research/commercial type of facility.
9. The machinery usage can vary and at this time machinery is stored on the Barnswood property on the Methven Highway (where we visited) and likewise it may well be a building is erected on the site in time for machinery storage near the areas marked as 14. We are not certain on exact location and sizing/scale as yet, but this building may include a ride on mower and some gardening tools possibly but it's possible the applicant may contract ground maintenance out to an external parties due to the scale and size of the site to be maintained. Any additional building would be for equipment and farm machinery/implement storage.
10. The proposed vehicle crossings will be in accord with ADC diagram contained in Appendix 10.7 for a vehicle crossing onto a principal road where road speeds exceed 50km/hr. This may crossover into an NZTA equivalent diagram with provision for sealing of the berm width and a culvert for drainage if required alongside recess of the gateway to have vehicles parked clear of the racecourse Road carriageway.
11. Consultation was undertaken with E2 Environmental (Andrew Tisch) with regards to on-site wastewater requirements for the site. It was in the form of email consultation so have attached as per below.

This proposal will require on site wastewater treatment. There will be up to seventy full/part time people on site and at very brief times of year will have more for field days, key harvest events, etc.



(Noting that Midlands has 100 full time staff across all its companies plus seasonal staff but some of these people are rarely at the office).

Relevant rule in the Canterbury Land and Water Regional Plan (CLWRP).

5.8 The discharge of wastewater from a new, modified or upgraded on-site wastewater treatment system onto or into land in circumstances where a contaminant may enter water is a permitted activity, provided the following conditions are met:

1. The discharge volume does not exceed 2 m³ per day; and

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Canterbury Land and Water Regional Plan

2. The discharge is onto or into a site that is equal to or greater than 4 hectares in area; and
- 2a. The discharge is not located within an area where residential density exceeds 1.5 dwellings per hectare and the total population is greater than 1000 persons; and
3. The discharge is not onto or into land:
 - (a) where there is an available sewerage network; or
 - (b) that is contaminated or potentially contaminated; or
 - (c) that is listed as an archaeological site; or
 - (d) in circumstances where the discharge would enter any surface waterbody; or
 - (e) within 20 m of any surface waterbody or the Coastal Marine Area; or
 - (f) within 50 m of a bore used for water abstraction; or
 - (g) within a Community Drinking-water Protection Zone as set out in Schedule 1; or
 - (h) where there is, at any time, less than 1 m of vertical separation between the discharge point and groundwater; and
4. The treatment and disposal system is designed and installed in accordance with Sections 5 and 6 of New Zealand Standard AS/NZS 1547:2012 – On-site Domestic Wastewater Management; and
5. The treatment and disposal system is operated and maintained in accordance with the system's design specification for maintenance or, if there is no design specification for maintenance, Section 6.3 of New Zealand Standard AS/NZS 1547:2012 – On-site Domestic Wastewater Management; and
6. The discharge does not result in wastewater being visible on the ground surface; and
7. The discharge does not contain any hazardous substance.

Clause 1:

70 full/part time people could generate over 2m³/day (2000L/d). See below and assume about 40L/p/day = 2,800L/day. 4000 L if there is 100 on site.



Category	Source	Typical wastewater flow allowance	
		L/person/day	
		On-site roof water tank supply [Note 1]	Reticulated community or bore water supply
Day staff	<ul style="list-style-type: none"> High water usage e.g. some factories and/or shower facilities [Note 14] For all standard facilities Facilities with full water reduction fixtures [Note 15] 	60	
		40	
		20 – 50	

We may be able to get under 2000L/d by doing any or all of:

1. Reduce with water saving fixtures.
2. Assume that part time staff use less than 40L/d.
3. Have storage and release say 5 days (say Mon to Fri) of wastewater over 7 days (Mon to Sun)

Clause 2. The site is over 4ha in area.

Clause 2A. The density of residential units is not 1.5units/ha. More like 1.5units/10ha+ here.

Clause 3:

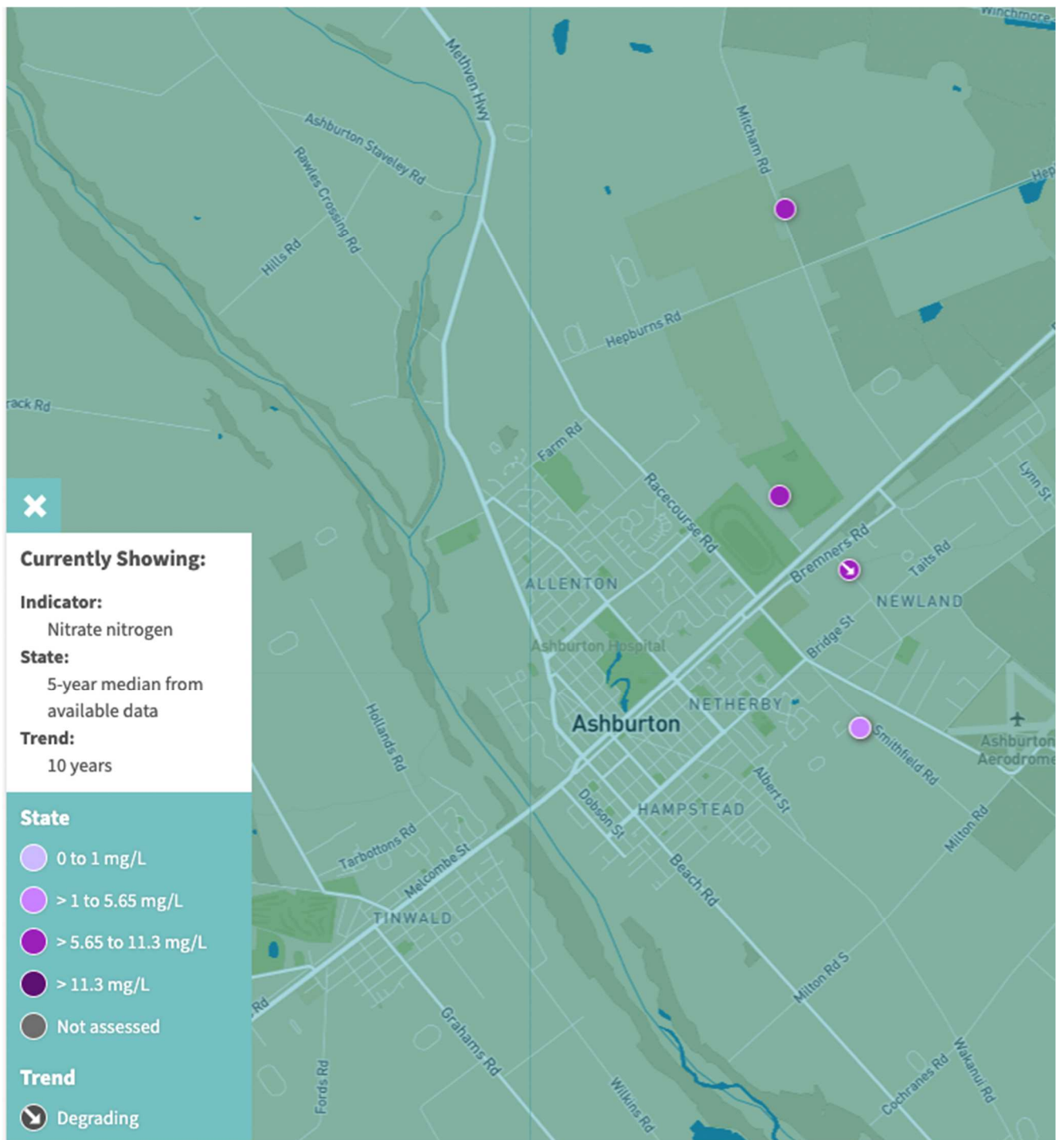
In terms of Clause 3 the following comments are relevant.

- (a) The closest wastewater (reticulated) is over 2km away (Carters/Farm Road intersection)
- (b) There is no soil contamination (HAIL) activity registered to this site.
- (c) n/a
- (d) Will not enter any surface water body. Closest is over 170m away (stockwater race running parallel to SH 77) upgradient of the site.
- (e) Over 20m away from waterbody
- (f) The closest bore is the applicants own bore K37/0836 (an irrigation and domestic supply bore) which is over 250m west from the building and discharge area.
- (g) There is no Community Drinking Water supply protection zone on this site.
- (h) The highest groundwater level at bore K37/0836 was -4.3mbgl. Therefore, there is ample separation between the proposed onsite wastewater discharge and highest HGL. A system would be designed to avoid any potential groundwater contact.

Nitrates

Recently Ecan have restricted septic systems in Ashburton area where there are high nitrates in the Ground Water. This area is high i.e. > half the Drinking Water Std: Note the drinking water standard is 11.3mg/L.





Andrew's comment was *having said that, if it meets the rule, I don't see that N could be considered.*

In summary, if we can confirm that it meets the rule, especially clause 1 and 3 as above then I'm not sure that the nitrate question can be considered.

The intent would be to meet clause 1. Clause 3 can be met.



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12. Bore K37/0836 is both an irrigation and a domestic water bore. The proposed facility will utilise the water from this bore to supply the potable water requirements for the office and staff facilities. As there is no high-pressure water supply, in terms of an on-site fire fighting water supply this will need to be a storage tank(s) on site with appropriate coupling attachment fitted so a fire appliance can connect in case of emergencies. This storage supply will be within ninety metres of the buildings.
13. The roof water from the buildings will be discharged direct to ground and hardstand areas being compacted areas will be discharged to swale areas as shown on the site plan. There is ample area of pervious surfacing over the site so stormwater can easily be managed within the site. it is not different to a farm block where the dwelling and ancillary farm buildings exist and then the driveways and tracks about the farm simply enable water to discharge to pervious areas. For this proposal there are designated areas where the rainwater discharge can be directed too.
14. There is the possibility of the on-site wastewater discharge consent being required from Environment Canterbury based on the volume of wastewater to be determined as mentioned earlier.

As the site is not contaminated there is unlikely to be any on site stormwater discharge consents required. If there are any Ecan consents required these can be required as part of the conditions of advice notes on the consent as and if required

Yours faithfully,



David Harford
Director

Encl: Building Plans
Earthworks Plans

