## Before the Independent Hearing Commissioner At Ashburton District Council

under:	the Resource Management Act 1991
in the matter of:	application LUC23/0109 to the Ashburton District Council relating to the proposed equestrian centre located on 279 Stranges Road, Ashburton
between:	Southern Parallel Equine Centre Limited Applicant
and:	<b>Ashburton District Council</b> Consent Authority

# Statement of evidence of Catherine Stuart

Dated: 20 March 2024

Reference: Jo Appleyard (jo.appleyard@chapmantripp.com) Lucy Forrester (lucy.forrester@chapmantripp.com)

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## STATEMENT OF EVIDENCE OF CATHERINE STUART

#### INTRODUCTION

- 1 My name is Catherine Stuart.
- 2 I am the Director of Southern Parallel Equine Centre Limited (*SPEC*) which has lodged the application for a resource consent (*Application*) to establish an equine centre in Lake Hood (the *Proposed Equine Centre*).
- 3 I hold a Bachelor of Commerce in Accounting and International Economics, a Master of Business Administration majoring in Strategic Planning and Project Management; and have completed Diplomas in IT, Sales & Marketing and CRM Systems.
- 4 I have many years of experience and expertise from holding executive positions in multi-national organisations in Information Technology, Infrastructure Development, eCommerce and Hospitality. I have been the CFO and Project Lead in Infrastructure Re-development Projects in war torn regions; consulting to the UNDP, IMF and EU development sectors, whilst undertaking redevelopment projects in Sierra Leone, Angola and Uganda.
- 5 I developed an NGO implementing and validating development methodology in micro-enterprise, rural food security and villagebased infrastructure development projects in remote regions of Africa. This methodology is being used today by numerous NGOs on recommendation from the UNDP.
- 6 I have been presented several Achievement Awards for my work in multi-national Business Development and gained recognition for my humanitarian development work as Businesswoman of the Year in 2008.
- 7 I have spent the twenty years taking New Zealand to the international market, establishing long-term trade agreements and distribution networks globally for Geospatial, Electrical, Primary and Aviation industry sectors, working closely with Government bodies, building a portfolio of expertise in market access, trade development, regulatory, product certification, standards, and operational requirements.
- 8 My background in equine stud breeding stems from my youth, my grandfather and father owned and managed a large thoroughbred racehorse stud which included a sales centre, 700 stables, onsite vet and staff accommodation. Stud progeny were exported all around the world.
- 9 I am also a local resident on a 20 hectare property close to the SPEC site and near Lake Hood having lived there for 3 years.

# SCOPE OF EVIDENCE

10 The purpose of my evidence is to describe the Proposed Equine Centre facilities and operations, provide some New Zealand context on sport horse breeding, explain the choice in location, detail the potential benefits, and provide some comparable examples of facilities of this nature.

# THE PROPOSED EQUINE CENTRE

- 11 The Proposed Equine Centre seeks to establish a high quality, international standard equine stud breeding facility with associated built and outdoor facilities, including:
  - 11.1 A stud selling centre;
  - 11.2 An equine veterinary clinic and breeding services centre;
  - 11.3 Stables;
  - 11.4 Walking circle;
  - 11.5 Staff accommodation; and
  - 11.6 Arenas and training fields.
- 12 The Proposed Equine Centre will be for the purposes of breeding sport horses (i.e. horses which compete in events such as dressage, eventing, polo and show jumping), as opposed to race horses.
- 13 SPEC strive to embrace the principle of 'do it once, do it right.' The Proposed Equine Centre will provide fully research-based stud breeding supported by leading equine specialists with an aim to foster growth and development within the equestrian sector.

#### The stud selling centre

- 14 The stud selling centre will be the main building encompassing a large barn-style facility that will accommodate an arena for demonstration and training, client seating, stud offices, meeting rooms, and a client-only entertainment area. It will be used solely for the purposes of selling horses bred on site, although some of the horse stock for sale at the annual sales event will come from off-site (in the same way that typically occurs for rural sheep, deer and cattle sales).
- 15 The stud selling centre will also be used for training horses yearround (and is not exclusively for use on annual sales event days), particularly on wet days when training outdoors is not ideal.
- 16 Adjacent to the stud selling centre will be a paved parking area, with 45 parking spaces in total. This will provide parking for staff and visitors of the Proposed Equine Centre.

- 17 An equine veterinary clinic and breeding services centre is comprised in one building, with 58 associated breeding and veterinary care stables. These facilities will not be open to the general public and will be for the sole purposes of the stud breeding activity.
- 18 The veterinary clinic is proposed to manage the health and care of the breeding stock within the stud. The clinic will be fully equipped with the latest equine health technologies, including MRI, cat scan, ultrasound, full equipped operating theatre, chiropractic services, horse solariums, treatment stables with air mattresses, and equine stud recovery services. The veterinary clinic will be staffed by two leading PhD Equine Veterinary Specialists to care for the valuable stud horses.
- 19 The breeding services centre will comprise a world class breeding and research facility utilising the latest specialised reproductive techniques in ultrasonography, treatment, frozen embryo and embryo implanting, harvesting, storage, artificial semination, and semen catalogue. The centre will be fully equipped and staffed to undertake research-based development of bloodlines to develop top-line show jumping, dressage, hunter, eventing horses and polo ponies.
- 20 As an example of some of the research the centre might conduct, SPEC has entered into a partnership with a UK-based university which will facilitate equine nutrition research, led by Dr Lucy Waldron, a renowned equine nutrition specialist and SPEC advisor, to develop nutritious pastures for robust stud progeny.

# Stabling

21 Six stable blocks are proposed consisting of 100 stables per block. These stables will provide stabling for stud stallions, brood mares and foals, yearlings, and horses in training (when these are not being stabled within the breeding services centre). Stabling will not be available for general community use and will be for the sole purposes of the stud breeding and stud sales activity.

# **Other facilities**

- 22 The walking circle is contained in a covered building and will be utilised for horse exercise, discipline, general training and injury recovery therapy.
- 23 The sand arena will be used for training.
- 24 The existing dwelling on site will be retained and utilised for staff accommodation purposes only.
- 25 The balance of the site will be used as grazing areas for the horses, with some of these areas also doubling as training/exercise areas and polo fields.

#### **Description of the operation**

- 26 It is expected that there will be between 20-40 staff present on site on a daily basis. Visitor numbers during typical operations are expected to be less than 10 per day and will be by appointment only. Four staff members will live onsite permanently for security and stud stock protection.
- 27 Typical day to day operations for staff consist of minding/caring for horses, training horses, breeding horses, and general maintenance of the grounds. The site will typically house approximately 100 horses consistently on a day to day basis (with fewer in the initial months the centre is established as the mares will not yet have given birth).
- 28 The SPEC team will provide comprehensive training for stud progeny, producing competition-ready sport horses to meet the demand for sport horse show jumpers, eventers, dressage, and polo horses, both domestically and internationally.
- 29 Events will be held from time to time on the site. The largest event will be the annual sales event taking place over 2-3 days:
  - 29.1 This involves the showing and testing of horses for sale, and the auctioning of those horses.
  - 29.2 It is anticipated to cater to up to 500 prospective purchasers, their support people, and event contractors.
  - 29.3 It is common practice at high quality stud auctions for prospective purchasers to bring their existing horses to the site to test against prospective horses in competition.
  - 29.4 It is anticipated up to 600 horses could be present on site for these events, comprising both horses for sale, and the horses of prospective purchasers.
  - 29.5 While most of the horses for sale at the event will have been born and reared on site, it is anticipated that some horses will be sources from regional and national breeders to expand sales volumes and assist the regional and national equine industry. Ine
  - 29.6 Additional parking for this event will be provided informally on grassed areas within the site.
- 30 Other smaller events will also be held at the site. These will be comprised of smaller sales events (usually 1-2 days), and competition training (where prospective purchasers compete in equestrian sports with their existing horses against prospective horses to test their ability prior to purchasing). These smaller events will vary in size, with an absolute maximum of 200 prospective purchasers, their support people, and approximately 50

additional horses coming to the Site. At the other end of the scale, some of the events will be small, comprising around [60].

31 Overall, there will be no more than 25 event days per year. We would not want any more than this, so as to ensure the horses are well rested and not overworked.

# NEW ZEALAND AND THE EQUINE SECTOR

- 32 New Zealand horse breeds, particularly those bred for racing and equestrian sports, are highly regarded in the global market for several reasons. New Zealand has a rich tradition of breeding highquality racehorses. The country's temperate climate, fertile pastures, and excellent horse husbandry practices contribute to the development of strong and resilient sport horses. New Zealand-bred horses have achieved notable success on the international racing circuit, winning prestigious races such as the Melbourne Cup and the Dubai World Cup.
- 33 New Zealand's racing and breeding industry is highly respected globally, with a reputation for producing sound, well-bred horses. The country's rigorous breeding programs, strict biosecurity measures, and commitment to animal welfare contribute to the high standard of New Zealand bred horses. International buyers often seek out New Zealand-bred horses at auctions and sales due to their quality and value.
- 34 New Zealand also breeds a range of warmblood and sport horse breeds renowned for their athleticism, versatility, and trainability. These horses excel in disciplines such as show jumping, dressage, eventing, and endurance riding. New Zealand-bred sport horses are sought after by riders and competitors around the world for their quality and performance.
- 35 New Zealand is home to several pony breeds, including the New Zealand Hunter Pony and the New Zealand Sport Horse Pony popular for polo. These ponies are also well-suited for children, young riders, and small adults, with traits such as intelligence, agility, and a willing temperament. New Zealand-bred ponies are exported to various countries for use in pony club activities, showing, and recreational riding.
- 36 New Zealand's isolation from other countries has resulted in a unique genetic pool of horses, with breeds that exhibit traits adapted to the local environment. This genetic diversity, combined with selective breeding practices, has led to the development of horses with desirable characteristics sought after in the global market.
- 37 Overall, New Zealand horse breeds are highly regarded in the global market for the quality, performance, and genetic diversity. Whether it's racehorses, sport horses, or ponies, New Zealand-bred horses

continue to make an impact on the international stage and are sought after by equestrians and enthusiasts worldwide. The Proposed Equine Centre will seek to introduce new bloodlines within the sport horse sector, which will only increase New Zealand's reputation in this respect (as currently most New Zealand sport horses can be traced to a specific number of bloodlines).

38 Learning from New Zealand's horse racing success and demand within the horse racing industry SPEC intends to focus solely on equestrian sport horses. Unlike with races horses, New Zealand lacks a facility of this scale dedicated to sport horse breeding – there is a real gap in the market which smaller sport horse studs have struggled to fill.

## THE CHOICE IN LOCATION

- 39 Regions such as Waikato, renowned for its numerous sport horse studs and equine facilities, in addition regions such as Auckland, Bay of Plenty and Southland have well known studs.
- 40 Ultimately, the best region for breeding horses in New Zealand depends on various factors, including the specific goals of the breeding program, the type of horses being bred, and the preferences of the breeder.
- 41 Canterbury is a significant region for horse breeding in general, particularly in the areas surrounding Christchurch and the Canterbury Plains. The region offers diverse landscapes, including flat plains, rolling hills, and mountain ranges, providing a range of environments suitable for different types of horse breeding operations.
- 42 Ashburton, situated in the heart of Canterbury, New Zealand, offers a strategic location for a large-scale horse stud, equine research, and event centre. The region benefits from fertile soils, a temperate climate, and expansive grasslands, providing an ideal environment for breeding, training, and conducting research on horses.

#### THE BENEFITS

43 A world-class equine centre in Ashburton would attract visitors from across New Zealand and around the world, boosting tourism and generating revenue for local businesses. As discussed above, international buyers often seek out New Zealand-bred horses. SPEC have had an immense amount of interest already from international buyers wishing to visit the Proposed Equine Centre and participate in sales events once established, with the intent of bringing quality New Zealand sport horses back to their home country. SPEC projects export revenues in third year of trading at up to USD\$25m based on sale prices of USD\$250k through to USD\$1.5m for fully trained sport horses. 44 SPEC expects that there will be between 20-40 staff present on site on a daily basis. As well as providing these employment opportunities, the events of the Proposed Equine Centre will also bring in tourism and increased spending to the region, district, and to Lake Hood itself, as buyers and their support staff visit the District. While not directly quantified, SPEC considers this economic benefit would be significant. It would put Ashburton and Lake Hood on the equestrian map, nationally and internationally.

## **COMPARABLE FACILITIES**

- 45 The strategic vision is to establish and develop the Proposed Equine Centre to become an industry icon, Canterbury's sport horse destination.
- 46 SPEC intends on becoming the equestrian sport horse destination that Auckland's Karaka Sales Centre is to the horse racing industry. For comparison, the Karaka Sales Centre has 800 stables and convenes several sales per annum.
- 47 As there is no sport horse breeding centre of the scale and quality SPEC plans to establish in New Zealand, it therefore necessary to look overseas for comparable examples. Australia has a destination equine centre, Willinga Park<sup>1</sup>, a multi-million dollar development providing the same services as SPEC intends. Mr Terry Snow established Willinga to support and service equestrian sports in Australia and since its opening it has attracted many wishing to purchase Australian quarter horses, equestrian training, numerous events with riders, all competing with the comfort of having full service veterinary services at hand.
- 48 SPEC has based its strategic business plan and centre design on indepth discussions, information sharing and advice from Lane's End Stud<sup>2</sup> in Versailles, Kentucky, USA. Lane's End Stud convene large sales within their purpose-built facilities boasting a record year in 1983 of \$1.8 billion in sales through their sales centre. Lane's End Stud incorporates event facilities, grounds, stabling and veterinary services.
- 49 To further demonstrate and confirm the need to the SPEC planned facilities, other comparably similar sized centres elsewhere in the world include:

49.1 Spruce Meadows (Canada) - Over 1,000 stables.<sup>3</sup>

<sup>&</sup>lt;sup>1</sup> www.willingapark.com.au

<sup>&</sup>lt;sup>2</sup> www.lanesend.com

<sup>&</sup>lt;sup>3</sup> www.sprucemeadows.com

- 49.2 Aachen Soers Equestrian Centre (Germany) Over 1,000 stables.<sup>4</sup>
- 49.3 Hickstead (United Kingdom) Over 1,000 stables.<sup>5</sup>

## WASTE MANAGEMENT

50 SPEC is committed to ensuring the Proposed Equine Centre is sustainable and environmentally friendly. SPEC strives to utilise the latest technologies to achieve this goal.

## Wastewater solutions

- 51 SPEC has sought resource consent from Environment Canterbury to implement a Biogill wastewater treatment. This is a tested system that will deliver effective treatment of high organic waste streams at low cost and low energy, with minimal odour emissions. The BioGill system removes 89% of nitrogen, phosphates and pathogens. To further ensure the quality of water discharge (referred to as potable) SPEC intends on installing a three filter and UV system prior to the potable water being stored in three underground tanks.
- 52 While I fully expect that the Biogill wastewater solution will go forward, I have been in discussions with Ashburton District Council (*Council*) asset manager, Andrew Guthrie, around a 'Plan B' for wastewater disposal, being the discharge of treated wastewater into the Council's reticulated network.
- 53 The Council has provided approval in principle, subject to some conditions, for the discharge of the final treated effluent to the Council Transfer Pipeline in Stranges Road.
- 54 SPEC has received quotes for the cost of running the pipe and linking to the Council's treated water pipe. The quotes received are well within the budget SPEC has set aside for wastewater treatment, so is feasible from a financial perspective. SPEC also has a contingency fund to cover any additional or unexpected costs of the proposal should this be required. I am confident a suitable wastewater solution can be established at the Proposed Equine Centre.

#### Manure management

- 55 There are many options available to SPEC for the disposal of manure offsite.
- 56 Firstly, I understand that manure can be stored and spread on land as a permitted activity in the area. Horse manure makes for great organic fertiliser, which is increasingly becoming more sought after.

<sup>&</sup>lt;sup>4</sup> www.chioaachen.de/en/

<sup>&</sup>lt;sup>5</sup> www.hickstead.co.uk

I have been in discussions with a number of nearby farms who are interested in taking the manure from the SPEC site.

- 57 SPEC is also securing an agreement with Intelligro for them to take a proportion of the manure in exchange for SPEC using Intelligro as its landscape supplier.
- 58 SPEC is also investigating a future Agriculture Biochar solution for the management of manure on site. Horse manure would be converted on site into biochar through a process called pyrolysis, this process also captures and utilises energy released during the process. Biochar is a highly stable form of carbon with many practical uses, including improving soil structure, retaining moisture, and enhancing nutrient availability when added to agricultural soils. Should SPEC decide to move ahead with the Biochar facility, this would be consented separately in the future and planned implementation during SPEC construction.
- 59 In the meantime, there are a number of feasible options available to SPEC for the disposal of manure offsite.

## **RESPONSE TO SUBMISSIONS**

- 60 I have read the two submissions lodged in relation to this Application. I will leave responses to the issues raised in those submissions to the expert witnesses, but in relation to the submission by John Skevington and Jo Ruane, I wish to note:
  - 60.1 A related SPEC entity entered into an agreement with these submitters to purchase their land in 2021. Ultimately, the agreement fell over, and since then, the submitters have opposed any project I have been involved around Lake Hood.
  - 60.2 I am concerned that some of the matters raised in their submission relate to the above prior relationship I have had with them, rather than a genuine concern for the effects of this Application.
  - 60.3 With respect to the reference to the Southern Parallel Sports Campus (*SPSC*) (now Southern Parallel Campus SPC) in the submission, the current application is for the Proposed Equine Centre. The SPC is unrelated to this Application for resource consent.

# CONCLUSIONS

61 Establishing a large-scale horse stud, equine research and training centre in Ashburton, Canterbury, presents a unique opportunity to leverage the region's natural assets, research capabilities, and community spirit. Through fostering collaboration, innovation, and education, the centre can significantly contribute to the growth and sustainability of the equine industry while enriching the lives of residents and visitors alike.

62 The design of SPEC's facilities has been meticulously crafted to ensure the delivery of its services, support, projected regional and export revenues, and prioritise long-term sustainability. With a focus on architecturally designed facilities that prioritise the physical and mental health of the horse, SPEC aims to complement the aesthetic appeal of the region. Implementation of cutting-edge systems and technologies will minimise impact on neighbours, while adherence to sound management practices, environmental solutions, and close collaboration with local authorities including, the Ashburton District Council, ECAN, and Te Rūnanga o Arowhenua will be upheld both during the construction phase and beyond.

Dated: 20 March 2024

Catherine Stuart