



PLANNING HEARING REPORT
PURSUANT TO SECTION 42A OF THE RESOURCE MANAGEMENT ACT 1991

1.0 APPLICATION DESCRIPTION

1.1 Application and Property Details

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|------------------------|---|
| Application Number(s): | LU230109 |
| Applicant: | Southern Parallel Equine Centre Ltd |
| Application Summary: | Land use consent is sought to establish an equine stud, with associated built and outdoor facilities, parking and earthworks. |
| Site Address: | 279 Stranges Road, ASHBURTON |
| Legal Description: | Lot 1 DP 43334 |
| District Plan Zone: | Rural B |
| Activity Status: | Non-complying |
| Notification Status: | Limited Notified |
| Submissions Received: | 2 in opposition |
| Recommendation: | Approve |
| Author: | Nick Boyes (Consultant Planner) |
| Report Date: | 13 March 2024 |

2.0 EXECUTIVE SUMMARY

Southern Parallel Equine Centre Ltd has applied to the Ashburton District Council for resource consent to establish an equine stud, with associated built and outdoor facilities, parking and earthworks at 279 Stranges Road, Huntingdon. The proposed activity is defined as Intensive Livestock Management (Intensive Farming) under the District Plan.

The proposal has a non-complying activity status as the application does not comply with the Zone Standard set out in **Rule 3.10.7**, as the application site is within 1,500m of the Residential C zone located at Lake Hood. Other non-compliances relate to site standards relating to site coverage, earthworks, retail sales and commercial activities, and utilities within 20m of the bed of a stream.

The application was processed on a limited notification basis and two submissions opposing were received from adjacent property owners.

The assessment of the application has not raised any significant issues of concern regarding the environmental impact of the proposal. Based on the recommended conditions to be imposed on any consent granted, any adverse effects on the environment are considered to be no more than minor.

The application site is located on LUC1 soils and therefore the provisions contained in the National Policy Statement for Highly Productive Land (NPS-HPL) are relevant. It is considered that as a permitted farming activity the proposed use, including ancillary activities, is not an inappropriate use of highly productive land. On that basis the proposal is consistent with Policies 4 and 8 of the NPS-HPL.

In terms of the objectives and policies of the District Plan, the only tension relates to the location of the application site within the 1,500m setback included in the Zone Standard. The proposal is considered to maintain the amenity values and rural character of the receiving environment. On that basis the proposal is not considered to be contrary to the policy framework and as a consequence the application meets both limbs of the section 104D threshold test and is in order for approval.

3.0 INTRODUCTION

My name is Nicholas (Nick) Boyes. I am an independent planning consultant. I hold a Bachelor of Science (majoring in Plant and Microbial Science and Geography) from the University of Canterbury (1997) and a Master of Science (Resource Management) (Hons.) from Lincoln University (1999). I have worked in the field of planning/resource management since 1999, the last 23 years as a planning consultant.

I confirm I have read the Code of Conduct for Expert Witnesses (as updated in 2023) and agree to comply with it. In that regard I confirm that this planning report is written within my area of expertise, except where otherwise stated, and that I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

This planning report has been prepared on behalf of the Ashburton District Council in accordance with section 42A of the Resource Management Act 1991 (RMA). It follows an earlier notification report pursuant to sections 95A to F of the RMA prepared in December 2023. This report recommended that the application be processed on a limited notified basis as the written approval of all identified affected parties could not be obtained.

I undertook a site visit to the property and immediate surrounds on Tuesday 21 November 2023 and met with representatives of the Applicant company.

This report covers the substantive decision making aspects of the application, namely those relevant statutory requirements pursuant to sections 104, 104B, 104D and 108 of the RMA. It firstly provides a recommendation as to whether the application should be approved or declined, and subsequently provides a draft set of conditions to be imposed on any consent granted pursuant to section 108 of the RMA.

It should be noted that this report has been prepared to assist the Commissioner acting under delegation from the Ashburton District Council. The recommendations made in this report are made at the time of writing with the information available and are in no way binding. It should not be assumed that the Commissioner will reach the same conclusions having assessed the application documentation and received further evidence of submitters at the hearing.

4.0 THE PROPOSAL, SITE AND LOCALITY DESCRIPTION

4.1 Proposal

A full description of the proposed activity was set out in the application and accompanying Assessment of Environmental Effects (AEE) prepared on behalf of the Applicant by Ms Kim Seaton of Novo Group Ltd. A summary of that description is set out below.

Resource consent is sought under the Ashburton District Plan to establish an equine stud with associated built and outdoor facilities, including a selling centre, veterinary clinic, stables, training arenas, grazing and associated parking. The stud is referred to as the Southern Parallel Equine Centre (SPEC) and is intended to provide a world class equine stud and breeding facility to support and help advance the equestrian and polo sport sectors in New Zealand. On that basis it offers a full range of facilities.

As indicated on the Proposed Development Plans included as **Attachment 1**, the proposed main facilities include:

Stud Selling Centre:

The building will encompass 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. The building will have a footprint of approximately 6,066m² and a maximum height of 12m to the gable ridgeline. Two chimneys (which will exceed a dimension of 1m) will protrude an additional 2.75m above this.

The selling centre will be solely for uses associated with the development and sale of horses bred on the SPEC, though the main annual sales event may involve the bringing of stock to the site for sale from off-site.

An annual sales event is anticipated to cater for up to 500 prospective purchasers and their support persons. A small number of event contractors will also be present to run the sales, such as auctioneers.

Equine Veterinary Clinic/Equine Breeding Services Centre:

The Equine Veterinary Clinic, Equine Breeding Services Centre and 58 associated breeding and veterinary care stables are proposed to be contained within a single building. Access to this Clinic will not be open to the general public.

The building floor area will be approximately 3,070m² with a maximum height of 11.8m to the top of the ventilation shafts.

Stables:

Six stable blocks consisting of 100 stables per block. These provide stabling for stud stallions, brood mares and foals (not located within the Breeding Services Centre), yearlings, and horses in training. These stables will have a total footprint of approximately 21,392m² and will have a maximum height of 9.54m from natural ground to the top of the roof mounted ventilation shafts.

Walking Circle:

A covered horse walking circle of approximately 1000m² is included as part of the proposal. This is a basic structure with a roof and peripheral fencing or walls.

Staff Accommodation:

The existing dwelling on site is proposed to be retained and utilised for staff accommodation purposes.

Access/Parking Areas:

The principal access to the site will be from Stranges Road, via a new vehicle crossing centrally located along the road frontage. A sealed driveway will be provided from this entrance to the main selling centre and permanent parking area. Remaining vehicle, horse and pedestrian internal access will be gravelled.

A second vehicle access will be provided to the site from Huntingdon Avenue for staff and emergency access only. The first 10m of that access (as measured from Huntingdon Avenue) will be sealed in accordance with Council requirements.

The application sets out that construction traffic will principally utilise the existing entry to the site off Stranges Road until the new Stranges Road main entry is constructed. The application notes that an entrance off Huntingdon Avenue may also be utilised to a lesser degree during construction.

Dedicated parking areas will be formed as shown on the Site Plan. The main parking area adjacent the selling centre will be formed and marked to provide 45 car parking spaces, inclusive of two mobility spaces. Otherwise parking will be informal (gravel and unmarked) as the facility will not be accessible to the general public and parking requirements will be relatively low. The application refers to the extent of land available on-site for overflow parking during sales events.

Arenas and Training Fields:

The balance of the site is to be used for grazing areas, which will serve the dual purpose of providing training arenas, and fields for horses bred at SPEC.

Use of the arenas and fields will include provision for competitive events. Those events will only be open to prospective purchasers of horses bred at the SPEC. The application sets out that it is common practice at high quality studs for purchasers to bring their existing horses to the site, to test prospective horses in competition.

Wastewater:

A BioGill system will be installed to treat onsite wastewater. The system will comprise the BioGill Ultra Unit, being two BioGill Ultra Units for secondary Biological Treatment, and one BioGill Anoxic Ultra Unit for denitrification.

Earthworks:

An estimated 37,360m³ of earthworks (excavation) will be required on the site, exclusive of aggregate/concrete for foundations for buildings and paved surfaces, and of aggregate for gravel paths. All topsoil will be respread within the site, with minimal cartage required off site.

Waterways:

The surface waterways within the site will be enhanced and restored, including the removal of pest species such as blackberry and replanting of riparian areas. Works near the waterways will be restricted to these vegetation works and the creation of six new crossings. The crossings will comprise one bridge over Lagmhor Creek south of the junction with the northern branch; one bridge over the northern branch; three over the section of Lagmhor Creek between Stranges Road and the northern branch junction; and a relocated and extended culvert over the water race adjoining the main entrance to the site (relocated from the existing crossing that services the existing dwelling).

Boundary Treatment:

A deer-style fence between 1.6m-2m in height will be established on the southern boundary of the site, at the request of the neighbours to the south. Fencing on other boundaries is not yet confirmed, but will be rural in character.

Staff Numbers:

On a day to day basis, between 20-40 staff will be present on the site, with visitors typically anticipated to be less than 10 per day and by appointment only.

Site Identification/Signage:

The application AEE states that any signage is anticipated to be low key and related to the equine use of the site only. If signage is unable to comply with the provisions of the District Plan, the AEE states it will be the subject of a separate resource consent application.

4.2 Other Consents Required:

The following resource consents are required from Environment Canterbury (ECan) and have been applied for concurrently with this land use application:

| ECan Reference Number | Description | Status (as at 01/03/24) |
|------------------------------|--|--------------------------------|
| CRC242397 | To use land for earthworks | Application on Hold |
| CRC242398 | To install a culvert and construct a bridge | Application on Hold |
| CRC242399 | To take and use groundwater for dewatering purposes | Application on Hold |
| CRC242400 | To discharge dewatering water | Application on Hold |
| CRC242401 | To discharge contaminants to land from an onsite wastewater system | Application on Hold |

Table 1: ECan consents required.

During the course of processing this application contact has been made with ECan regarding the progress of the above applications. Based on that correspondence it is understood that it is CRC242401 that could potentially result in a hearing.

On that basis the relevant statutory considerations set out in section 102 RMA 'Joint hearings by 2 or more consent authorities' have been considered and discussed with the Applicant.

The Applicant expressed a strong preference to proceed with the ADC land use consent hearing prior to the notification decision on the ECan applications. Furthermore, to facilitate that outcome, has held initial discussions with the ADC regarding the ability to discharge the treated wastewater into the reticulated network. It is understood that these discussions took place on the basis that this was a "fallback" option should obtaining an ECan wastewater consent on a non-notified basis become problematic, or ultimately unsuccessful.

Based on the outcome of those discussions, the ADC has provided approval in principle (and subject to certain conditions) for discharge of the final treated effluent to the ADC Transfer Pipeline in Stranges Road (see correspondence in **Attachment 2**). It is on that basis, and at the request of the Applicant, that the hearing of this application has proceeded prior to the notification decision on the above ECan applications.

4.3 Application Documents (Plans and Reference Documents)

The list of application documents and plans is as follows:

- Southern Parallel Equine Centre Ltd Application and AEE (Novo Group Ltd, 6 November 2023);
- Appendix 1 – Record of Title;
- Appendix 2 – Site and Building Plans;
- Appendix 3 – Integrated Transportation Assessment (Novo Group Ltd, October 2023);
- Appendix 4 – Earthworks Plan (Davis Ogilvie & Partners Ltd, October 2023);
- Appendix 5 – Hynds Landspan Bridge System Technical Guide R4.1;
- Appendix 6 –Landscape Concept Master & Planting Plans (DCM Urban Design Ltd, 31 October 2023);
- Appendix 7 – Detailed Site Investigation (Pattle Delamore Partners Ltd, 20 October 2023);
- Appendix 8 – Compliance Assessment (Novo Group Ltd, 6 November 2023);
- Appendix 9 – Landscape and Visual Impact Assessment DCM Urban Design Ltd, 6 November 2023);
- Appendix 10 – Ecology Assessments (Aquatic Ecology Ltd, November 2023; and Boffa Miskell, 8 November 2022);
- Appendix 11 – Odour Assessment (WSP, 4 November 2022);

4.4 Adequacy of Information

A request for further information under section 92 of the RMA was made on 29 November 2023. This related to:

- Further ecological comment;
- Odour assessment from the proposed manure handling and removal frequency from site; and
- Water Supply.

The Applicant provided the information requested on 14 December 2023. It is considered that the information submitted by the Applicant is sufficient to enable the consideration of the following matters on an informed basis:

- a) The nature and scope of the proposed activity as it relates to the relevant national environmental standard(s) and the Ashburton District Plan.
- b) The extent and scale of any adverse effects on the environment.
- c) The requirements of the relevant legislation.

4.5 Site and Locality Description

The application site is located at 279 Stranges Road, Ashburton, and legally described as Lot 1 DP 43334. The application site is approximately 65ha in area being immediately west of Lake Hood as is indicated in **Figure 1** below. The site is predominantly flat, with Lagmhor Creek main stem located centrally within the site. A water race is located along the western boundary of the site, adjacent to Stranges Road.



Figure 1 Application Site Location Plan

The site currently contains a single storey, four bedroom house, with access from Strangers Road that is tenanted. The site otherwise comprises farm land that is used for rural production activities (including both stock grazing and the growing of crops). The site is predominantly Class 1 soils under the LUC Classification, with a small area adjacent to Strangers Road classified as Class 3.

4.6 Locality

The surrounding area to the west/southeast/south is similarly rural in character. However, to the east of the site is Lake Hood and a golf course, while to the north/northeast is the established and developing residential areas associated with the Lake Hood residential community.

The Ashburton/Hakatere River is located further to the east beyond Lake Hood.

5.0 NOTIFICATION AND SUBMISSIONS

5.1 Limited Notification

All matters required to be assessed in terms of sections 95 to 95F, of the RMA have been addressed in the Notification Report previously prepared in relation to this application.

GHJ & EJ Small were the only party that provided written approval to the proposed activity. Notice of the application was served on those persons identified as being adversely affected by the proposal in accordance with s95E of the RMA, as set out in **Table 2** below and shown on the aerial plan in **Figure 2**.

| Identifier | Address | Affected Persons |
|------------|--|-------------------------------------|
| 1 | Springvale Avenue (Val. 2446005236) | JW Skevington & JP Ruane |
| 2 | 36 Huntingdon Avenue (Val.2446005218 | M B & X Brandsma |
| 3 | 2 Village Green Drive (Val. 2446005233) | JW Skevington & JP Ruane |
| 4 | 4 Village Green Drive (Val. 2446005232) | Mike Greer Homes Mid Canterbury Ltd |
| 5 | 339 Stranges Road (Val. 2446005300) | RP Lash & NJ Lash |
| 6 | Grahams Road (Val. 2446020233) | Skevington Farms Ltd |
| 7 | Grahams Rd/Maginness Road (Val. 2446005411) | Caithness Stud (NZ) 2011 Ltd |

Table 2: List of persons identified as Affected and served notice of the application.



Figure 2 Location of Affected Persons

5.2 Submissions

At the close of the submission period a total of two submissions opposing the application were received.

A summary of the issues raised in submissions together with the relief sought by the submitters is set out in **Table 3** below. Please note that this table provides only a summary of the key issues raised in submissions. Please refer to the full submission included in **Attachment 3**.

| Name | Address | Submission Points | Relief Sought |
|--|------------------------------------|--|---------------|
| John Skevington and Jo Ruane JA & MJ Skevington | 6 Penbury Close, Lake Hood | <ol style="list-style-type: none"> 1. Loss of Land Use Capability Class 1 productive land. 2. Land intensification leading to: <ul style="list-style-type: none"> • Noise effects • Effects of light spill • Effects of odour from wastewater discharge and manure. • Traffic effects and parking • Visual, landscape and character effects. 3. Inconsistency in the information provided in the application. 4. Potential for further future development. | Decline |
| Craig, Annabell and Tim Read | 703 Grahams Road, RD4 Ashburton | <ol style="list-style-type: none"> 1. Submitter wishes to see conditions imposed to ensure wastewater is appropriately managed on an on-going basis, including nitrogen and phosphorus loss. 2. Rural amenity is provided for. 3. Loss of productive land and that NPS HPL requirements are met be all elements of the proposed activity. | Neutral |

Table 3 Submissions Summary.

6.0 REASONS FOR THE APPLICATION

6.1 Ashburton Operative District Plan 2014

The application site is zoned Rural B Zone in the operative Ashburton District Plan.

Rule 3.8.2 lists certain permitted activities, provided that they comply with all of the relevant Site and Zone Standards below and all relevant District-Wide Rules and, are not otherwise listed as Controlled, Discretionary or Prohibited Activities.

Both 'Farming Activities' and 'Intensive Farming' are both listed as permitted therein. These terms are defined as follows:

Farming Activity: means the use of land and buildings for the primary purpose of the production of vegetative matter and/or commercial livestock. Farming activity includes the packing, storage, and/or processing of the vegetative matter and/or commercial livestock produced on/in that land or on other land owned or managed by the same person(s). Buildings for this purpose are permitted up to an area of 500m² per site, where they meet all other rules.

Farming activity excludes residential activity, home occupations, intensive livestock management, and forestry activity.

Intensive Livestock Management (Intensive Farming): means the use of land and/or buildings for the production of commercial livestock, including where the regular feed source for such livestock is substantially provided other than from the site concerned, and includes:

- the farming of pigs outdoors at a stocking rate exceeding 15 pigs per hectare. (Stocking rate in relation to pig farming, means the number of pigs (excluding progeny up to weaner stage) carried

per hectare of land, where the area of land fenced, available and used for pig farming shall only include that area on which the pigs are regularly run.);

- *herd houses, feed pads, or any building providing shelter to stock where stock are confined within the building for any continuous period exceeding 2 weeks;*
- *boarding of animals;*
- *mushroom farming;*
- *fish farming;*
- *the disposal of effluent from any of the above, whether on the same site as the intensive livestock management activity or not.*

Based on the proposal description and explanation included in the AEE, the housing of stud stallions, yearlings and stock older than foals will fall within the definition of intensive farming. On that basis the six blocks of stabling at the southern extent of the development represent intensive farming, with a smaller proportion of stables within the breeding services/main building potentially also falling within this definition periodically when stallions are accommodated.

The AEE included a full compliance assessment against the relevant District Plan provisions (see Appendices 3 and 8 of the AEE). The assessments therein have been reviewed and are agreed with.

In summary, resource consent is required due to non-compliance with the following Site and Zone Standards:

- **Rule 3.9.2** Site Standard 'Site Coverage' – the total site coverage of buildings and impervious surfaces will be approximately 3.78ha, exceeding the permitted 3.25ha for the 65ha application site.
- **Rule 3.9.13** Site Standard 'Earthworks' – the proposed earthworks are in excess of the permitted 2,000³ volume, 2,000m² area and within 20m of a stream. Approximately 37,360m³ of earthworks are proposed.
- **Rule 3.10.7** Zone Standard 'Intensive farming', the proposed stables will be within 1500m of a Residential C zone (at Lake Hood).
- **Rule 14.7.4(e)** Discretionary activities – utilities that are otherwise permitted that are on land within the bed of any waterbody or within 20m of a stream. The proposal will require pipes for the conveyance of sewer, water and stormwater within 20m of the stream. The AEE notes that the pipes will be attached to the underside of the proposed bridge crossings, not located within the bed of the waterbody itself.

A potential non-compliance not otherwise noted in the application AEE relates to **Rule 3.9.11**. If any vegetation clearance at the work site in the vicinity of Lagmhor Creek were to include indigenous species, **Rule 3.9.11(d)** would be breached:

There shall be no clearance of indigenous vegetation on any sites in the Rural A and B Zones, except where it is planted in a domestic garden or used for shelter purposes.

It is understood that the Applicant accepts the recommendation from AEL that all indigenous vegetation is retained. However, it is noted that should the bridge crossings require the removal of any indigenous vegetation any such breach does not alter the overall activity status, which would remain non-complying.

The Skevington/Ruane submission also makes reference to **Rule 3.9.10** the Site Standard relating to 'Retail Sales and Commercial Activities', which is not otherwise addressed in the application. Retail sales are defined in the District Plan as:

means the direct sale or hire to the public from any site and/or the display or offering for sale or hire to the public on any site of goods, merchandise or equipment. Retail sales includes restaurants, but excludes recreational activities.

Commercial Activity is defined as:

means any activity trading in goods, equipment or services. It includes any ancillary activity to the commercial activity (for example administrative or head offices). Includes office activities, retail activities and commercial services.

It also includes recreational activities where a fee is paid to use facilities i.e. a commercial bowling alley. It does not include community sports facilities where a membership fee may be paid.

The Skevington/Ruane submission asserts that the on farm sale of horses in the manner proposed is subject to this rule. It is noted that should that be the case all other on-farm sales undertaken within the Ashburton District would similarly be captured. So the interpretation of the Rule in the manner set out in the submission has wider implications beyond this application.

It is understood that the Council has not previously interpreted the Site Standards set out in **Rule 3.9.10** as applying to on-farm sales, as they are considered part of the permitted activities of farming/intensive farming, rather than a standalone retail sales/commercial activity.

It is noted that **Rule 3.8.2.h**, sets out that Commercial Activities; including “*retail sales of farm and garden produce grown, reared or produced on the site; or handcrafts produced on the site*” shall be a permitted activity.

The applicability of **Rule 3.9.10** depends on whether live horses (and any other livestock for that matter) are classified as “goods”; given they are clearly not merchandise, equipment or services.

‘Retail Sales and Commercial Activities’ are subject to the following standards set out in **Rule 3.9.10**:

- a) *Retail display and sales are limited to single retail outlets, not exceeding a gross floor area of 40m² and located within buildings.*
- b) *Group visits to sites used for farming or residential activities shall not result in the maximum number of vehicles visiting the site exceeding 3 buses per week and 25 cars per week.*
- c) *There shall be no lighting from external light sources at night (between one hour after sunset and one hour before sunrise) of any retail sales or commercial activity.*

(Please note that d) relates only to the Mt Hutt ski-field Policy Area as shown on the Planning Maps so is not included.)

Therefore compliance also depends on whether the proposed selling centre is a ‘single retail outlet’. The term retail outlet is not defined in the District Plan, but ‘retail activity’ is, as follows:

means the use of land or buildings for displaying or offering goods for sale or hire to the public and includes, but is not limited to, food and beverage outlets, small and large scale retail outlets, trade suppliers, yard based suppliers, second hand goods outlets and food courts.

On farm sales such as that commonly undertaken in the rural zone utilise existing farming buildings, which are in my view not ‘retail outlets’ in the traditional sense. The position set out in the Skevington/Ruane submission may be on the basis that the selling centre is dedicated for sales use only. My understanding is that this building will otherwise be utilised throughout the year for demonstration and training purposes, offices and meeting rooms. In that way it is no different to shearing sheds and covered yard areas that might be used for annual on-farm sales events.

In terms of group visits, the annual sales event proposed would exceed the scale of activity set out in b) above. In my view it is clear that this standard is aimed at rural tourism farm visits and commercial garden tours etc, rather than on-farm sales. The proposal can comply with c).

Should the proposed annual sales event be considered a ‘Retail Sales and Commercial Activity’ as described in **Rule 3.9.10**, this element of the proposal would be a restricted discretionary activity. On

that basis compliance (or otherwise) with this rule does not alter the overall activity status, which remains non-complying due to **Rule 3.10.7** as assessed above.

6.2 Activity Status

Rule 3.8.4 sets out that any activity which is listed as a Permitted Activity or Controlled Activity and which complies with all of the relevant Zone Standards, but does not comply with any one or more of the relevant Site Standards shall be a restricted discretionary activity. This is the case for the proposed earthworks undertaken within 20m of a stream and any retail sales and commercial activities not complying with **Rule 3.9.10**.

Rule 3.8.5 sets out that any activity which is not listed as a Permitted, Restricted Discretionary, Non Complying or Prohibited Activity shall be a discretionary activity. This proposal includes farm buildings being in excess of 500m² in floor area, which fall outside the definition of farming activity set out above. Such buildings have therefore been assessed as being a discretionary activity.

Rule 3.8.6 sets out that any activity which does not comply with any one or more of the relevant Zone Standards shall be a non-complying activity. This is the case in relation to Zone Standard **Rule 3.10.7** 'Intensive farming'.

Overall, land use consent is required for the proposal as a non-complying activity under the District Plan as the proposed stables will be less than 1500m from a Residential C Zone (being approximately 680m).

7.0 CONSIDERATION OF APPLICATION

7.1 Section 104 & 104D

Section 104(1) of the RMA provides the statutory requirements for the assessment of the application and sets out those matters that the Council must have regard to when considering the application. Subject to Part 2 of the RMA, it is considered that the relevant matters for the assessment of this application include:

- (a) *Any actual or potential effects on the environment of allowing the activity;*
- (ab) *any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from allowing the activity;*
- (b) *The relevant objectives, policies, rules and other provisions of the District Plan; and*
- (c) *Any other matter that the Council considers relevant and reasonably necessary to determine the application.*

Section 104(2) allows the Council when forming an opinion in relation to any actual or potential effects on the environment of allowing the activity to disregard any adverse effects of the activity on the environment if the District Plan permits an activity with those effects.

Under section 104B of the RMA the Council may grant or refuse an application for a discretionary or non-complying activity, and if it grants the application, may impose appropriate conditions in accordance with section 108.

Section 104D sets out particular restrictions for non-complying activities, a consent authority may grant a resource consent for a non-complying activity only if it is satisfied that either the adverse effects of the activity on the environment will be minor, or the application will not be contrary to the objectives and policies of the District Plan.

7.2 Part 2 RMA

Reference to Part 2 when considering a resource consent should not be necessary if the applicable plan/s have been prepared having regard to Part 2 and with a coherent set of policies designed to achieve clear environmental outcomes. In the context of this application, it is considered that the relevant district plan has been competently prepared and the policy provisions are coherent and comprehensive. Therefore there is no need to go beyond the relevant District Plan and specifically assess Part 2 in making a decision. Notwithstanding, the relevant provisions of Part 2 are set out below for completeness.

Part 2 of the RMA sets out the purpose and principles of the Act, being “to promote the sustainable management of natural and physical resources” which is defined to mean:

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 wellbeing and for their health and safety while –

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably 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.*

Any assessment is informed by reference to the matters set out in sections 6, 7 and 8 of the RMA. Section 6 sets out matters of national importance; in the case of the subject application no matters of national importance are considered to be at threat.

Section 7 requires particular regard to be had to ‘other matters.’ Of relevance to this application are:

- (b) the efficient use and development of natural and physical resources;*
- (c) the maintenance and enhancement of amenity values;*
- (f) maintenance and enhancement of the quality of the environment;*

Section 8 requires the principles of the Treaty of Waitangi to be taken into account. This section of the RMA recognises the relationship of Tangata Whenua with natural and physical resources and encourages active participation and consultation with Tangata Whenua. Any relevant matters are considered in the evaluation section of this report.

7.3 Actual and Potential Effects on the Environment (Section 104(1)(a))

7.3.1 Effects that must be disregarded - Any effect on a person who has given written approval to the application (section 104(3)(a)(ii))

Pursuant to section 104(3)(a)(ii), when forming an opinion for the purposes of section 104D1)(a) a council must not have regard to any effect on a person who has given written approval to the proposal. As stated above, GHJ & EJ Small were the only party that provided written approval to the proposed activity. No adverse effects of the proposed activity on GHJ & EJ Small have been considered in the assessment below.

7.3.2 Effects that may be disregarded – Permitted Baseline assessment (section 104(2))

Section 104(2) allows any effects that may arise from permitted activities set out in a NES or a plan to be excluded from the assessment of effects related to the resource consent. This is known as the permitted baseline test. The ‘baseline’ constitutes the existing environment (excluding existing use rights) against which a proposed activity’s degree of adverse effect is assessed. Generally it is only the adverse effects over and above those forming the baseline that are relevant when considering the effects of the proposal.

It is at the Council’s discretion whether to apply the assessment of the permitted baseline to any proposal. Essentially, the consent authority may disregard an adverse effect of any activity on the

environment if a NES or an operative plan (or an operative rule in a proposed plan) permits an activity with that effect.

The AEE submitted with the application does not specifically address the matter of the permitted baseline. Presumably that is because of the nature of the non-compliance with **Rule 3.10.7** 'Intensive farming'. There is no location on the application site that provides the required 1500m from a Residential C zone (which is located at Lake Hood).

7.3.3 Effects that may be disregarded – Trade Competition (section 104(3)(a)(i))

It is considered that no matters of trade competition arise in relation to the proposed development and the nature of the submissions received.

7.3.4 Receiving Environment

It is my understanding that in assessing the effects of a resource consent applications, the consent authority is required to determine the relevant receiving environment. This must include a determination of what form the environment might take in the future having regard to activities that may be carried out if presently existing implemented and unimplemented resource consents are given effect to. In that context I am not aware of any existing but unimplemented resource consents that would change the nature of the receiving environment from that observed during the site visit.

7.3.5 Relevant Considerations

Having regard to the above and after analysis of the application (including any proposed mitigation measures), undertaking a site visit, reviewing Council records and submissions received, the following effects have been identified as requiring specific consideration in respect of this application (please note that were relevant these generally follow the same order as address in the application AEE):

- Transport Effects (including Vehicle Access and Parking)
- Visual, Landscape and Natural Character Effects
- Amenity (Construction, Noise & Lighting) and Rural Character Effects
- Intensive Farming and Odour Effects
- Ecological Effects
- Cultural Effects
- Earthworks and Servicing
- Positive Effects.

These matters are considered in turn below. Please note that matters specific to the National Policy Statement for Highly Productive Land (NPS-HPL) are addressed in a following section.

7.3.6 Transport Effects (including Vehicle Access and Parking)

The AEE states that the main vehicle access proposed to the application site is via a new crossing onto Stranges Road. A secondary access to Huntingdon Avenue is also provided for staff / operational use and as an additional emergency evacuation route. All other accesses will be limited to farm gates for livestock / paddock access only.

The Skevington/Ruane submission raises concerns regarding the proposed Huntingdon Avenue access; however, it appears that the submitter may consider that the proposed use of this access is much greater than set out above. In any case, it is considered appropriate to impose a condition on any consent granted that the use of the Huntingdon Avenue access to the site is limited to staff use for operational purposes, except in the case of emergency where it could provide an alternative evacuation exit.

The application included an Integrated Transport Assessment (as Appendix 3). This assessment describes the proposal and assesses all transport related aspects of the Ashburton District Plan. It is noteworthy that the proposal results in no transport related matters of non-compliance with the District Plan standards.

Typical daily vehicles movements are dominated by staff, with approximately 20-40 staff working from the site, with a smaller number of visitors (typically less than 10 per day). Whilst the existing dwelling will be retained on the site for staff accommodation, this is not anticipated to reduce staff numbers significantly. The proposal includes that 45 permanent car parks will be sealed, marked and identified to comply with the layout requirements of the District Plan (including a minimum of two accessible spaces). Typical daily vehicle trips are anticipated to be 112.

Peak traffic will arise due to the annual sales event, which could cater for up to 500 prospective purchasers and their support persons and not more than 50 horses (to create a competition like environment to test SPEC horses against and for sale). A small number of event contractors will also be present to run the sales, such as auctioneers. The Transport AEE estimates daily traffic generation of a sales event to be 48 horse float/truck trips and 452 passenger vehicle trips. Overflow parking demand for some 226 spaces may be needed for such annual events, which would require around 5,000- 5,500m². As noted in the AEE, this can be accommodated in 2-3 of the grass paddocks or similar grass areas around the site.

Some informal staff parking may also occur on grass or gravel areas near the other buildings, to suit the operational needs. A minimum of 30 horse float and truck spaces will be formed with a mixture of heavy duty grass parks with grass or gavelled aisles/accessways. These will be available for regular use of horse floats and trucks by SPEC and also for any horses coming to the site during sales events.

Overall, the proposal will be self-sufficient for car parking and an event management plan will be in place for any sales events to ensure no parking of vehicles occurs on road sides. The AEE notes that sales events will require a temporary traffic management plan. For the larger annual sales event this could include temporary reduced speed limits, cones for managing any queues and event signage. A condition is recommended that a Traffic Management Plan be submitted to Council a minimum of two weeks prior to sales events.

Site access is provided via Local Roads and can be designed to cater for the anticipated volume of traffic. The proposed locations provide good visibility and are considered to provide for safe and efficient access to the local road network.

7.3.7 Visual, Landscape, Rural and Natural Character Effects

The site is well designed, and it is clear from the plans will be constructed to a high standard of visual amenity in terms of both built form and landscaping.

Notwithstanding, the proposed 3.78ha of built and impervious surfaces exceeds the built form site coverage for a rural site, and the scale of development exceeds that which would typically locate in a rural environment in terms of its built form. However, it is considered that the site will retain sufficient areas of green open space to maintain a rural character. It is noted that a rural zoning is the appropriate location for this type of farming activity.

The proposed 12m height of the buildings is well within the maximum 20m for rural buildings within the Rural B Zone (**Rule 3.9.3**). This height, along with the separation distance to adjoining roads and internal boundaries serves to reduce the perceived scale and bulk of the proposed buildings.

The landscape and visual assessment provided with the application further notes the degree of 'compartmentalisation' occurring due to landscape planting around and between the buildings. The report also references the extensive landscape peripheral plantings designed to soften views of the proposed buildings and carpark areas while retaining a high level of amenity.

It is acknowledged that adjacent rural properties will experience a change in the openness of views across the application site. However, due to distance and intervening vegetation (existing and proposed), the high level of amenity proposed in terms of the built form, any adverse effects from such a change are considered to be minor.

In terms of the natural character of the surface waterways present within the site, the proposal includes buildings being setback and crossings being designed so as to minimise the extent of earthworks required within riparian margins. The nature of the use of the site and the landscape enhancement proposed along the waterways, the impacts of the proposal on natural character are considered to be positive.

7.3.8 Amenity (Construction, Noise & Lighting)

Temporary construction noise is expected; this can be controlled through conditions requiring adherence to the NZ Construction Noise Standard and appropriate management plans.

District Plan **Rule 11.8.3** 'Construction Noise' sets out that Construction noise shall comply with NZS 6803:1999 Acoustics – Construction Noise. Construction noise limits of 70 dB LA_{eq} and 85 dB LA_{max} apply during the daytime period of 07:00 – 18:00, Monday to Saturday.

It is noted that while some quiet works would be permissible outside these times (e.g., painting, plastering etc), the applicable noise limits generally preclude noisy construction works on Sundays and at night on any day.

Overall, it is considered that the effects of construction are likely to result in nuisance effects on adjoining properties, however, these are an inevitable outcome of development, will be temporary in nature and will adhere to the NZS 6803:1999 Acoustics – Construction Noise. On that basis any construction effects are considered to be minor.

On-going noise from the proposed activity is considered to be in compliance with District Plan noise standards and any effects therefore less than minor.

Light spill from the site is referenced in the Skevington/Ruane submission. **Rule 3.10.9** relates to Lighting, which requires:

- a) *All fixed exterior lighting shall be directed away from adjacent properties, roads, and railways and angled below the horizontal.*
- b) *No lighting from any activity shall result in a greater than 3 lux spill (horizontal and vertical) of light onto any adjoining property within a Residential Zone, measured at any point more than 2m inside the boundary of the adjoining property.*

The AEE states that the proposal will comply with these standards. Similarly, any lighting effects are therefore considered to be less than minor.

7.3.9 Intensive Farming and Odour Effects

Odour from the intensive farming of horses on the site has the potential effects to impact on the wider environment beyond those sites immediately adjoining the application site. The nature of the operation is such that a discharge to air consent is not required from ECan.

It is noted that the applicable rule in the District Plan refers to intensive farming activity being subject to a 400m setback from any residential unit on another site; and a 1500m setback from a residential zoning. The proposed site layout complies with the 400m setback, but the site is approximately 600m from the nearest Residential C zoned land.

In response to a request for further information, the Applicant provided further specialist technical assessment of the odour effects arising from the proposed activity. This assessment concluded that a separation distance of 500m should be adopted for the stable blocks and veterinary clinic & breeding

centre, with a reduced 200m setback for the for the selling centre. These setbacks are set out in **Figure 3** below (taken from the WSP assessment submitted in response to the request for further information). It indicates that that none of the existing residential zoned areas or future dwellings beyond those sites owned by persons considered affected would be within the setback distances.

On the basis of the specialist assessment provided, the setback distances are considered sufficient to avoid adverse effects. Notably this means that the closest residential areas adjacent to Lake Hood are outside these setbacks and are therefore not considered to be adversely affected by odour emanating from the application site.

Notwithstanding the proposed setback, the Applicant has included mitigation measures to reduce the potential for odour impacts on the receiving environment. The Applicant undertakes to remove all cleaned out stable material from the site on a daily basis.

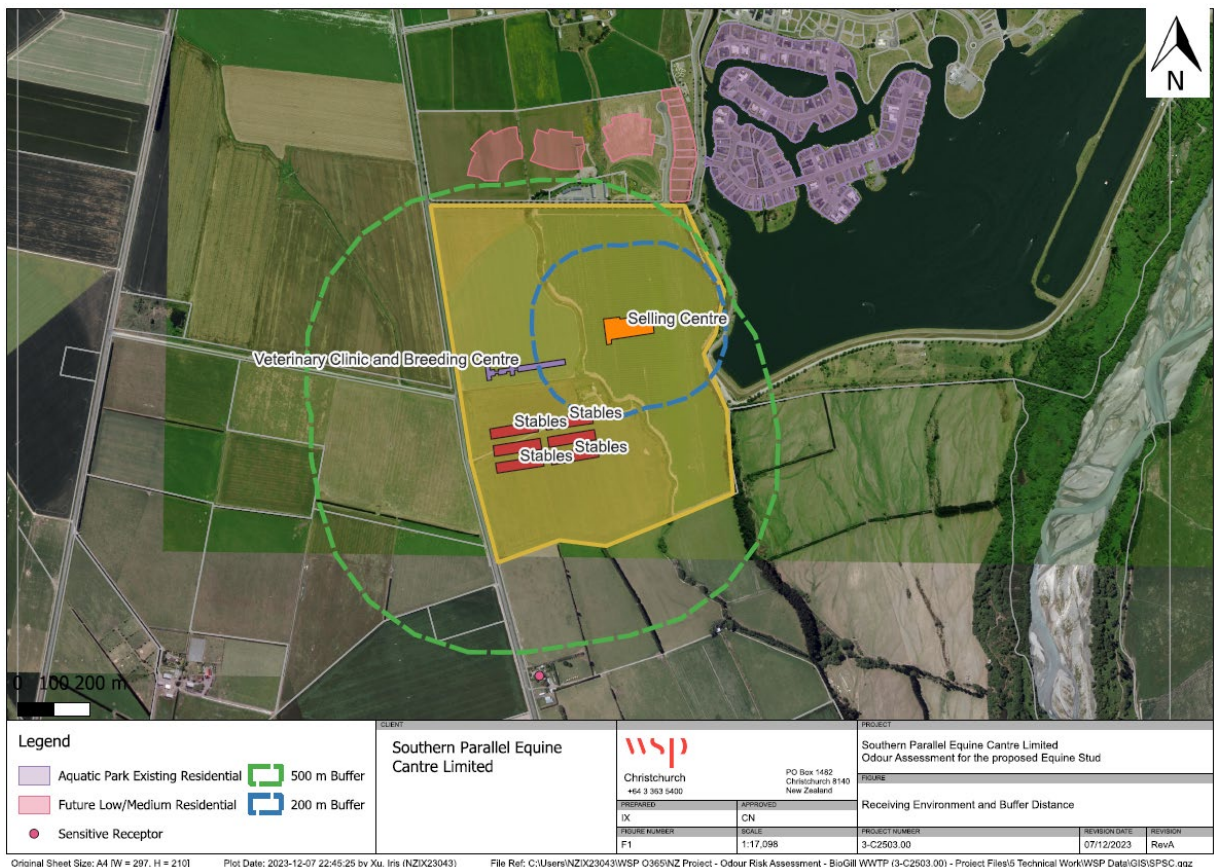


Figure 3 Odour Assessment Setbacks (WSP, Christchurch)

The WSP assessment focussed on setbacks and made no particular comment on the adequacy of the proposed mitigation measure put forward by the Applicant to address any potential odour issues. Notwithstanding, it is noted that should odour issues arise, the Applicant can undertake further operational changes to reduce odour potential, such as removing manure more frequently or changing the way manure is piled on site awaiting removal.

The efficacy of the proposed handling and daily disposal of manure is likely to be the subject of further evidence provided prior to the hearing. In the meantime, any concerns can be addressed by inclusion of a review condition to address odour should the need arise. As such, no adverse odour effects are anticipated at adjoining properties from the intensive farming stable activity.

7.3.10 Ecological Effects

The ecological effects arising from the proposal relate to the waterways present and their immediate riparian margins. Otherwise the balance of the site has been cultivated over a number of years and represents improved pasture being of little ecological value.

Two ecological assessments were submitted as part of the application AEE (see Appendix 10 of the application). A report prepared by Boffa Miskell (2022) provides a broader overview of the ecological values of the site, including confirming that the majority of the site is of little ecological value, with such value as there potentially is being focused on the waterways and peripheral rank grass areas. The Boffa Miskell report recommended further, more detailed survey, work be undertaken in these areas.

A subsequent report prepared by Aquatic Ecology Ltd (AEL) focusses on the surface waterbodies on the site, with a particular focus on waterway crossing locations. No wetlands have been identified on the site. The AEL report confirms that there are no areas of ecological significance near the proposed bridge crossings, although the presence of some indigenous vegetation, including flax that could potentially be habitat for skink, was noted. AEL recommend that all indigenous vegetation in the waterways and riparian areas is to be retained. It is understood that the Applicant accepts that recommendation, which can be imposed as a condition of consent.

The AEL report makes additional recommendations to manage the ecological effects of construction:

- i. In summer, a herpetologist survey bridge locations for lizards and consider mitigation options if found.*
- ii. Haul Road and bridge placement be undertaken after the bird breeding season (i.e., February to June).*
- iii. Paired TSS/turbidity recording both upstream and downstream of the construction site and a maximum construction water discharge of 50 gm/m³ would be suitable for this receiving environment.*
- iv. Should construction works extend beyond June, that a survey be conducted to locate any nesting birds around the bridge construction sites.*
- v. Stormwater runoff from the Haul Road and vehicle car park areas, be treated before discharge to waterways, possibly by ground infiltration.*
- vi. Dust suppression methods be used to control wind-borne dust off the Haul Road.*
- vii. Haul Road and bridge placement between February to June.*

It is understood that the Applicant accepts the above recommendations, which (where appropriate) can be imposed as conditions on any consent granted for the proposed activity.

Beyond the mitigation above to address any potential for adverse ecological effects, it is noted that the proposal includes various riparian planting that would result in ecological benefits for the quality of the waterways running through the site.

7.3.11 Cultural Effects

The Applicant has engaged with Te Rūnanga o Arowhenua via Aoraki Environmental Consultancy Limited (AEC). A formal response to the application was received from AEC dated 14 November 2023. The principal matters of concern to Rūnanga are the well-being and mauri of the waterways and the land.

While having no specific concerns with the application Arowhenua ask that the following are considered by the Applicant in their proposal to recognise the importance of the area in which the equine centre is located:

- Arowhenua rūnanga are consulted prior to works commence on the enhancement of Lagmhor Creek to enable taonga species to be relocated if works will interfere with the flow of water within the creek.

- There is a minimum of a 20m setback from Lagmhor Creek for all activities and this setback is planted with indigenous species.
- Confirmation that the proposed development will not adversely impact the water quality within the creek, as it is a tributary of the Hakatere/Ashburton River.
- Earthworks are undertaken with an awareness that there may be archaeological finds uncovered. If this is the case, then it is requested that Arowhenua and the Heritage New Zealand are contacted.
- Arowhenua rūnanga would also welcome the opportunity to discuss the opportunity to showcase manawhenua arts and replant indigenous plants traditionally found in the area within designs and/or landscaping regime.

The Applicant is likely to provide specific comment on each of the above matters in evidence presented to the hearing. It is noted that some of the matters listed above are beyond the scope of what could be required in terms of consent conditions. The proposed buildings meet the 20m setback referred to above. An accidental discovery protocol can be included as a condition on any consent granted.

The correspondence received makes it clear that Arowhenua rūnanga do not consider there to be adverse cultural effects arising from the proposed activity.

7.3.12 Earthworks and Servicing

The scale of the development necessitates a large volume of earthworks being undertaken over a large area.

The potential effects from these earthworks in terms of erosion and sediment control and dust can be addressed through appropriate management plans. It is noted that a Dust Management Plan is required in terms of ECan requirements. On the basis that such plans are in place and adhered to, then any effects from dust are considered to be temporary and minor.

As a rural site, services are currently provided for on-site. The Applicant has had discussions with the Ashburton District Council regarding potable water supplied from the Council network, which would require a new pipeline to be installed to the site at the Applicant's cost.

In respect of firefighting water supply, the Applicant expects to capture roof stormwater for storage, or otherwise provide on-site storage of town water supply, sufficient to generate the volumes of water required for up to FW6 firefighting storage volume. Confirmation of the adequacy of the supply for firefighting purposes prior to construction of buildings commencing, can be required as a condition of consent.

In terms of wastewater, the Applicant proposes to install a BioGill system will be installed to treat onsite wastewater. The system will comprise the BioGill Ultra Unit, being two BioGill Ultra Units for secondary Biological Treatment, and one BioGill Anoxic Ultra Unit for denitrification. The Applicant also intends to install a UV unit to provide final deactivation of pathogens.

As noted above, discharge consent for the treatment and discharge of wastewater is being applied for separately from ECan. Furthermore, the Applicant has investigated the option of discharging the treated wastewater to the Council's reticulated network. Matters of the proposed wastewater treatment and discharge are a key concern of both submitters in relation to this proposal. In the context of this land use consent, it is considered that adequate options are available to the Applicant to achieve an adequate outcome. The details around that are otherwise the subject of a separate consent process and beyond the scope of this ADC application.

7.3.13 Positive Effects (section 104(1)(ab))

Section 104(1)(ab) sets out that the consideration of applications must have regard to any measure proposed or agreed to by the Applicant for the purpose of ensuring positive effects on the environment

to offset or compensate for any adverse effects on the environment that will or may result from allowing the activity.

In this regard it is noted that the proposed development can result in positive outcomes in terms of providing further creation of local employment opportunities that assist in people to provide for their social and economic well-being.

Other potential positive benefits arising from the proposal are increased biodiversity through the removal of pest species such as blackberry and replacement with indigenous riparian planting providing improved habitat.

There is also the potential for improvements in surface water quality arising from more comprehensive planting in riparian areas and reduced nutrient losses from the adjacent farmland.

7.3.14 AEE Summary & Conclusion

The proposed activity is permitted by the District Plan subject to a series of site and zone standards. In this case the proposed site is entirely within the 1.5km setback from the Residential C zone at Lake Hood. On that basis the activity, regardless of scale, can only be established on site through a non-complying resource consent.

The scale of the proposed buildings exceeds the limitation provided in the definition of farming activity (500m²) and also the site standard related to site coverage.

The proposed stables consist of a group of 6 buildings in two rows. The ends of three buildings facing Stranges Road and are otherwise elongated internal to the site. The vet building and associated stables and selling centre are centrally located along the Stranges Road frontage but sufficiently distant from each other to assist in the mitigation of visual amenity and rural character effects. Extensive boundary and internal planting serves to provide a high level of amenity, complimenting the high standard of built form proposed. The proposal is not considered to detract from the modified rural character of the surrounding area, which includes Lake Hood and associated residential area. The proposed location on a rural site adjacent to Lake Hood is considered to be appropriate and raise the amenity values of the receiving environment.

Effects of earthworks and other potential temporary nuisance construction noise and dust effects can be effectively managed through standard management practices as set out in recommended conditions. Odour effects from equine manure are to be managed by removal off-site on a daily basis. A review condition can be imposed should the frequency of removal need to be increased. Matters of wastewater treatment and discharge are beyond the scope of this application (including nutrient management), albeit that the Applicant has demonstrated that sufficient options are available to adequately service the proposed activity.

Overall, the proposal is a rural activity of a type requiring high levels of amenity. The proposal plans reflect this in terms of the built form, layout and landscaping proposed. Based on the assessment above, any adverse effects of the proposal are considered to be minor.

7.4 National Environmental Standards (NES) (section 104(1)(b)(i))

The only NES that is applicable to this application is the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NESC) came into force on 10 October 2011.

A Detailed Site Investigation (DSI) has been undertaken and was provided with the application (Appendix 7). The DSI confirms that contamination levels are above background levels in defined areas of the site but remain below guideline levels.

The use of the site will continue to fall within the definition of production land contained in the RMA. Furthermore, the soils in the immediate vicinity of the existing dwelling will not be disturbed as part of the redevelopment of the site. No other residential use of the site is proposed. Therefore, in accordance with Clause 5(8) the NESCS does not apply.

7.5 National Policy Statements (section 104(1)(b)(iii))

There are three National Policy Statements relevant to this application, as assessed below.

7.5.1 National Policy Statement on Freshwater Management

The NPS-FM came into effect on 3 September 2020 and was subsequently amended in February 2023. The NPS-FM prioritises the health and well-being of water bodies and freshwater ecosystems over the health needs of people and the ability of people and communities to provide for their social, economic and cultural well-being.

The works proposed on-site will improve the riparian margins of the surface waterways located within the site, no wetlands have been identified on the site.

The potential effects of stormwater and wastewater discharge from the site are within the jurisdiction of ECan. Furthermore, the Applicant has the back-up option of discharging wastewater to the Council's reticulated network.

Overall, it is considered that the proposal is consistent with the outcomes sought in the NPS-FM.

7.5.2 National Policy Statement for Indigenous Biodiversity

The NPS-IB came into force on 4 August 2023. It requires district councils to assess significant natural areas (SNA), and also contains provisions that require consideration of adverse effects on indigenous biodiversity prior to any district plan changes occurring. The ecology assessments undertaken by Boffa Miskell and AEL for this site indicate the site does not contain any SNA. Objective 1 seeks that there is at least no overall loss in indigenous biodiversity after the commencement date, this will be achieved for this proposal.

7.5.3 National Policy Statement for Highly Productive Land

The application site is considered to be highly productive land under the National Policy Statement on Highly Productive Land (NPS-HPL) as it is classified as LUC 1, 2 and 3.

The NPS-HPL came into force on 17 October 2022. The objective is that:

Highly productive land is protected for use in land-based primary production, both now and for future generations.

This objective is implemented by seeking to prioritise and support the use of highly productive land for land-based primary production (Policy 4) and protect it from inappropriate use and development (Policy 8).

The NPS-HPL definition of 'Land-based primary production' *"means production, from agricultural, pastoral, horticultural, or forestry activities, that is reliant on the soil resource of the land"*; and 'Supporting activities' *"means those activities reasonably necessary to support land-based primary production on that land (such as on-site processing and packing, equipment storage, and animal housing)"*.

The Skevington/Ruane and Read submissions both raise the matter of the NPS-HPL. The Skevington/Ruane submission suggests that the supporting activities proposed appear much larger in scale and intensity as to be considered 'reasonably necessary' to carry out the activity on site, such as the amount of stabling (animal housing). The submitter considers the proposal will *"effectively turn top quality irrigated arable farmland into sports fields"*.

The Read submission notes the scale of the proposed 6,066m² Stud Selling Centre, which includes stud offices, meeting rooms and client-only entertainment areas. Additionally, the submission notes that grazing areas will provide land to host competitive show jumping, dressage, hunter class and polo events, and training areas for these activities. Whilst the submitter appreciates that these activities are associated with the rearing, keeping, breeding, and grazing of horses, they note these are not activities that lend themselves to the use of land for cropping, viticulture, berry fruit, pastoralism, tree crops and forestry and are activities that could be provided for in areas of the District which are better suited for these sort of commercial uses. Overall, the Read submission asks the ADC to carefully and thoroughly consider all elements of the proposal to ensure it is consistent with the relevant objective, policies, and clauses of the NPS-HPL.

The intent of the NPS-HPL objective and policies is further clarified by Clause 3.9(1) which provides that territorial authorities must avoid inappropriate use or development of highly productive land that is not land-based primary production. Clause 3.9(2)(a) sets out that “*supporting activities on the land*” are not inappropriate.

The key questions are then:

- a) whether the proposed equine centre is land-based primary production; and consequently:
- b) whether the supporting activities proposed (parking, stables, an equine veterinary clinic/equine breeding services centre, and a stud selling centre) on site are “reasonably necessary” to carry out the proposed land based primary production activity on the site.

The application AEE addresses each of these, the key aspects being:

- The proposed equine centre involves the rearing, keeping, breeding, and grazing of livestock. The proposed activity is therefore production from either an agricultural or pastoral activity. The ‘production’ aspect of the activity is thoroughbred horses.
- The rearing, keeping, breeding, and grazing of horses is reliant on the soil resource of the land as good quality pasture. Access to quality pasture can be the difference between a problem horse and a calm and responsive animal. Inadequate pasture can be responsible for head-flicking, windsucking, inflammations (including laminitis), reproduction issues and a range of other behavioral and health issues. In contrast, good pasture has a cooling, calming effect on a horse’s temperament. Good quality pasture is dependent on the productive capacity of the underlying land.
- The proposed supporting activities are:
 - essential, and integrated components to any successful equine stud centre.
 - exclusively for the purposes of supporting the equine stud centre and will not be used for any other purpose (i.e., for other rural industries not reliant on soil resource).
 - necessary to support the land-based primary production of thoroughbred horses.
 - enable the production of thoroughbred horses entirely on-site right up to the point of sale.

It is considered that the proposed activity is primarily related to the breeding of livestock (being thoroughbred horses). That activity in my view is clearly land based primary production and is reliant on the soil resource of the land. It is considered that the nature of the intensive farming activity proposed is much more reliant on the soil resource than more traditional forms of intensive farming, which are exclusively undertaken in sheds and do not require any additional land to support that activity.

The proposed supporting activities cannot practically or efficiently be provided on another site, they are required to be located on the same site as the land based primary production. On that basis it is

considered that they are reasonably necessary to carry out the proposed land based primary production activity on the application site. The proposed supporting activities are not considered to be an inappropriate use of highly productive land.

On that basis the proposal is consistent with Policies 4 and 8 of the NPS-HPL in that:

The use of highly productive land for land-based primary production is prioritised and supported ; and Highly productive land is protected from inappropriate use and development.

7.6 New Zealand Coastal Policy Statement (NZCPS) (section 104(1)(b)(iv))

The NZCPS is not applicable to this application.

7.7 Canterbury Regional Policy Statement (section 104(1)(b)(v))

The Canterbury Regional Policy Statement ("CRPS") is a strategic document which sets out the direction of managing the use, development and protection of the natural and physical resources of the Canterbury region. This document became operative in 2013.

The strategic objectives and policies of the CRPS provide a framework to achieve the integrated, consistent and co-ordinated management of the Region's resources.

Under the CRPS, matters related to environmental protection, such as the coastal environment, land use and infrastructure, water quality, water conservation and allocation and air quality have specific objectives, policies and methods to achieve sustainable and integrated management of major natural and physical resources in the Region.

The application AEE sets out a detailed assessment of the Objectives and policies contained in the CRPS. The matters set out in that assessment are not disputed. The hierarchical nature of the planning framework is such that the provisions contained in the Ashburton District Plan have regard to the objectives and policies set out in the CRPS. The CRPS will also be considered in the context of the suite of applications required from ECan related to the proposed activity. On that basis no detailed assessment of the CRPS is included in this report.

7.8 Ashburton District Plan (section 104(1)(b)(vi))

The zone description for the Rural B Zone states that the zone is a working environment providing for agricultural and horticultural activities and the diversification thereof, and including "*a limited number of intensive farms*".

The most relevant objectives and policies to the assessment of this application are found in Section 3: Rural Zones. It is noted that the District Plan also contains a number of objectives and policies relating to Transport and Noise. Given the assessment of effects above, these objectives and policies are noted, but are considered of lesser importance.

7.8.1 Rural Objectives and Policies

The following objectives and policies of the Rural Chapter of the Ashburton Operative District Plan 2014 are considered relevant.

Objective 3.1: Rural Primary Production

To enable primary production to function efficiently and effectively in the Rural A and B Zones, through the protection and use of highly versatile and/or productive soils and the management of potential adverse effects.

Policy 3.1A *Provide for the continued productive use through farming activities and protection of highly productive and/or versatile soils, and their associated irrigation resources, by ensuring that such land is not developed for intensive residential activity and/or non-rural activities and the extent of coverage by structures or hard surfaces is limited.*

Policy 3.1C *Avoid the establishment or expansion of intensive farming or other rural activities in close proximity to settlement boundaries and residential activities; to manage any adverse effects created by such activities for example noise, odour and dust.*

Policy 3.1E *Protect highly productive and/or versatile soils by discouraging activities such as earthworks and extractive processes that significantly deplete the topsoil or the subsoil.*

The above objective and related policies is enabling of rural production and prioritises the protection of the soil resource, particularly versatile or highly productive land. This reflects national policy guidance as already assessed above.

In addition, the accompanying explanation and reasons considers that intensive farming should be guided away from the Rural A Zone “as there is a greater potential for conflict with other farming or residential activities”. The District Plan acknowledges that issues associated with intensive farming activities occur as a result of poorly sited and designed buildings, poor farm management practices and waste disposal methods.

Based on the assessment above, the proposal is considered to be appropriately located and the buildings suitably designed. Recommended conditions can ensure management practices follow best practice. Whilst located relatively close to the Lake Hood residential area, the technical advice received is such that the nature of the activity is such that sufficient separation is provided to address potential odour effects.

It is noted that the Skevington/Ruane submission states that the proposal is “contrary to” **Policy 3.1C**. This outcome would rely on “close proximity” used in the Policy being defined as the 1,500m setback set out in **Rule 3.10.7**. In my view if the District Plan did intend for all intensive farming within 1,500m of a residential zone to be avoided, then non-compliance with **Rule 3.10.7** would appropriately result in prohibited activity status. As set out above, technical assessment of the proposed intensive farming activity has determined that a much reduced separation distance to the residential area is appropriate given the nature of the proposed activity. In that context I do not consider the proposal to be contrary to **Policy 3.1C**.

Objective 3.2: Biodiversity

Protect, maintain and/or enhance indigenous biodiversity and ecosystems by controlling and managing activities that have the potential to affect the life supporting capacity of soils, and water quality in the lakes, rivers and wetlands and significant nature conservation values.

Policy 3.2A *To protect, maintain and enhance indigenous biodiversity and ecosystems, in particular areas of significant nature conservation values or land above the altitudinal land use line shown on the Planning Maps, by controlling vegetation clearance, the establishment of buildings, planting of trees, earthworks, and subdivision and development.*

Policy 3.2E *Promote and encourage effective onsite treatment and disposal of effluent to protect the quality of water in lakes, rivers and wetlands.*

The proposal will result in positive biodiversity outcomes by enhancing the riparian margins through the site by way of additional planting. In terms of **Policy 3.2E**, the wastewater treatment and disposal is the subject of a separate consent process with ECan. Discharge consent will only be approved on the basis that the matters set out in **Policy 3.2E** are met. Alternatively, the ADC has indicated that the treated wastewater can be discharged into the Council’s reticulated system, which would also be consistent with the outcomes sought in the policy.

Objective 3.4: Natural Character

Preserve the natural character of the District’s coastal environment, rivers, lakes, wetlands and their margins, and protect such areas from inappropriate subdivision, land use and development.

Policy 3.4A *Recognise that the following natural patterns, qualities, elements, features and processes contribute to natural character:*

- *areas or water bodies in or close to their natural state;*
- *water flows, levels and quality;*
- *coastal or freshwater processes;*
- *landforms and landscapes;*
- *indigenous biodiversity.*

Policy 3.4C *Maintain and, where possible, enhance the naturalness, indigenous biodiversity and nature conservation values of lakes, rivers, wetlands and their margins with the restoration of contours and indigenous planting.*

Policy 3.4I *Require the location, design and use of structures and facilities which:*

- *pass across or through the surface of any water body; or*
- *are attached to the bank of a water body.*

To be assessed in relation to their effects on natural character.

As described above, the buildings are appropriately setback to maintain the natural character of surface waterbodies. Whilst a number of bridge crossings are proposed, any impact on the natural character of the waterways, including Lagmhor Creek, are more than offset by the proposed riparian planting proposed. Earthworks associated the waterway crossings are also the subject of an ECan consent.

Objective 3.5: Rural Character and Amenity

To protect and maintain the character and amenity values of the District’s rural areas, considering its productive uses whilst providing for non-rural activities that meet the needs of local and regional communities and the nation.

Policy 3.5A *Maintain clear distinctions between the urban and rural areas and avoid the dispersal of residential activities throughout the rural areas that anticipate a higher standard of amenity than rural activities.*

Policy 3.5E *Retain an open and spacious character to the rural areas of the District, with a dominance of open space and plantings over buildings by ensuring that the scale and siting of development is such that:*

- *it will not unreasonably detract from the privacy or outlook of neighbouring properties;*
- *sites remain open and with a rural character as viewed from roads and other publicly accessible places;*
- *the character and scale of buildings is compatible with existing development within the surrounding rural area;*
- *the probability of residential units being exposed to significant adverse effects from an activity on a neighbouring property is reduced.*

As a permitted rural activity, the proposed equine breeding facility is considered to maintain the character and amenity values of the rural area. Whilst the scale of built form is greater than that anticipated by the District Plan, the proposed buildings remain rural in nature, and will maintain amenity values due to the high standard of construction and finish. In that way the proposed location is compatible with and compliments the adjacent Lake Hood residential development, whilst still maintaining a distinct urban/rural contrast. In my view the site displays a higher level of amenity value than traditional farming.

7.8.2 Transport Objectives and Policies

The following objectives and policies of the Transport Chapter 10 of the Ashburton Operative District Plan 2014 are considered relevant.

Objective 10.2: Transport Efficiency

The efficient use of the District’s existing and future transport infrastructure and of fossil fuel usage associated with transportation.

Policy 10.2A To provide for the efficiency of the transport network by implementing a policy of consolidation to avoid sprawl and unnecessary extension of urban areas.

Policy 10.2E To limit congestion and loss of efficiency of adjacent roads, by ensuring off-street loading is provided for activities.

Objective 10.3: Transport Safety and Accessibility

The maintenance and improvement of the safety and ease of pedestrian, cyclist and vehicle movement throughout the District.

Policy 10.3B To preserve road safety and accessibility by ensuring that standards of road design, vehicle access, vehicle crossings, loading, parking for people with disabilities and cycle parking are related to intended use of each site and the relationship to the adjoining road classification, and that visual distractions that may affect the safety of road users are avoided or mitigated e.g. lighting and advertising.

Policy 10.3E To ensure that the number, location and design of vehicle crossings and the intensity and nature of activities along roads is compatible with road capacity and function, in order to ensure vehicle, cyclist and pedestrian safety, and to strictly limit the establishment of high traffic generating activities with vehicle crossings to State Highways 1 and 77.

Policy 10.3F To ensure that convenient and accessible car parking for people with disabilities and cycle parking is available for both staff and visitors for all activities.

Policy 10.3G To require loading facilities appropriate for the vehicles servicing land use activities.

Objective 10.4: Environmental Effects of Transport

To provide for a transport network that avoids adverse effects on the surrounding environment.

Policy 10.4B To ensure adequate car parking for people with disabilities, cycle parking and loading provision is made in association with all activities, which is sufficient to cater for normal generation demand.

The Transport assessment provided with the application notes that the proposal meets all District Plan transport related standards. All parking, loading for both staff and visitors is to be provided for on site. All new vehicle entranceways/crossings are to be constructed in accordance with Council standards.

The traffic volumes anticipated from the proposed activity, including the annual sales, are within the safe and efficient carrying capacity of the local roading network.

On that basis the proposal is considered to be consistent with the transportation related policy framework set out in the District Plan.

7.8.3 Noise Objectives and Policies

The following objectives and policies of the Noise Chapter 11 of the Ashburton Operative District Plan 2014 are considered relevant.

Objective 11.1: Effects of Noise

Minimise the potential for conflict between noise emissions from land use activities and other more sensitive land uses.

Policy 11.1B To avoid or mitigate effects of noise on residential uses, by ensuring all activities meet standards in respect of noise measured on or near the property boundary, which will not compromise the qualities of the residential environments, and by discouraging residential uses from locating close to land zoned or used for noisy activities.

The proposal has been put forward on the basis that it meets the noise standards contained within the District Plan. On that basis it is considered to meet the above policy expectations.

7.8.4 Utility Objectives and Policies

Objective 14.1: Effects from Utilities on Amenity and the Environment

To provide for the construction, installation, operation, upgrading and maintenance of utilities where adverse effects on amenity and the surrounding environment can be appropriately avoided, remedied or mitigated.

Policy 14.1A *To avoid, remedy or mitigate adverse environmental effects arising from the construction, installation, operation, upgrading and maintenance of utilities.*

Water will be supplied to the application site via pipe from the Council's reticulated network. This will result in minimal effects on the environment following rehabilitation of affected land.

Wastewater and stormwater will be treated and disposed of to a high quality to mitigate potential adverse effects on the surrounding environment. These are the subject of separate consent applications. Overall, the proposal is considered to be consistent with the objectives and policies of this section.

7.8.5 Objectives and Policies – Summary and Conclusion

The scale and nature of the proposed activity causes some policy tension, namely in terms of those set out in Rural Section 3.1 and 3.5. The application site is considered to be an appropriate location for this farming activity, which will contribute to the already high level of amenity in the areas around Lake Hood.

Whilst this location does not accord with the spatial outcome set out in **Policy 3.1C**, in my view it is not contrary to it. Otherwise the proposal is consistent with the outcomes set out in the objectives and policies of the District Plan.

7.9 **Other Matters Considered Relevant and Reasonably Necessary to Determine the Application (section 104(1)(c))**

Section 104(1)(c) sets out that when considering an application for a resource consent the consent authority must, subject to Part 2, have regard to any other matter the consent authority considers relevant and reasonably necessary to determine the application.

7.9.1 Precedent and Plan Integrity

In the context of the subject application the only 'other matter' considered relevant is the question of precedent and plan integrity of granting a non-complying activity. It is my understanding from relevant case law that the concept of precedent reflects a concern that the granting of resource consent may have planning significance beyond the immediate vicinity of the land concerned; with plan integrity more likely to affect the public confidence in the plan and its consistent administration. It is acknowledged that 'precedent' is not an adverse effect on the environment *per se*. However, these are considered to be matters that can be considered under section 104(1)(c) of the RMA, with the appropriate weight to be given to them being dependent on the circumstances of the particular application.

Overall, it is considered that the nature of this proposal is such that precedent and integrity of the plan are not defining matters in the consideration of this application. The District Plan explanation and reasons to **Objective 3.1** acknowledges that the Rural B zone is the appropriate location for intensive farming activities, and that "*the Council will consider intensive farming proposals on their merit in the Rural B Zone*". This illustrates the case by case basis of any such proposal and that grant of a consent cannot be taken as a precedent or expectation that other future proposal will similarly be approved.

7.9.2 Iwi Management Plan

The applicable Iwi Management Plan (IMP) for the site is understood to be the IMP of Kati Huirapa for the Area Rakaia to Waitaki, dated July 1992. The Mahaanui IMP applies as far south as the Hakatere/Ashburton River boundary and therefore excludes the application site.

Overall, the proposal supports the objectives and aspirations expressed in the IMP, being:

- The clean up all rivers, lakes, waterways and coastal waters.
- All discharges of harmful contaminants to air that threaten the life supporting capacity of air, land and water should cease.

7.10 **Particular restrictions for Non-Complying Activities (section 104D)**

As referred to above, in order to be eligible for approval in accordance with section 104D of the RMA, a consent authority may grant 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;...*

In terms of my understanding of the thresholds for this test, an activity can have adverse effects, up to the point where they remain to be described as minor, but not be 'more than minor'. In terms of the objectives and policies, the activity proposal can have elements of inconsistency, but cannot be described as contrary. My understanding of relevant case law is that this is a high threshold, being described as 'repugnant to'.

Based on the assessment above, it is considered that the proposal meets both limbs of the threshold test.

7.11 **Consideration of Part 2 (Purpose and Principles) of the RMA**

The purpose of the RMA under section 5 is the sustainable management of natural and physical resources. This means managing the use of natural and physical resources in a way that enables people and communities to provide for their social, cultural and economic well-being while sustaining those resources for future generations, protecting the life supporting capacity of ecosystems, and avoiding, remedying or mitigating adverse effects on the environment.

Section 7 identifies a number of "other matters" to be given particular regard by a council in the consideration of any assessment for resource consent, and includes the efficient use of natural and physical resources, the maintenance and enhancement of amenity values and the quality of the environment.

The assessment of the application has considered that the adverse effects on the environment will be no more than minor and that the only concern raised in terms of the objectives and policies of the District Plan relates to **Policy 3.1C** and whether the application site is located in close proximity to the Lake Hood Residential C zone.

The proposal is not considered to be contrary to this policy and on that basis passes both limbs of the section 104D threshold test for non-complying activities.

Overall, the application is considered to meet the relevant provisions of Part 2 of the RMA and achieves the purpose of the RMA being sustainable management of natural and physical resources.

8.0 RECOMMENDATION AND CONDITIONS

8.1 Recommendation

Subject to new or contrary evidence being presented at the hearing, it is recommended that under sections 104, 104B, and 104D of the RMA, resource consent LU230109 is **approved** to the non-complying activity application by Southern Parallel Equine Centre Ltd to establish an equine stud, with associated built and outdoor facilities, parking and earthworks at 279 Stranges Road, Ashburton.

8.2 Conditions

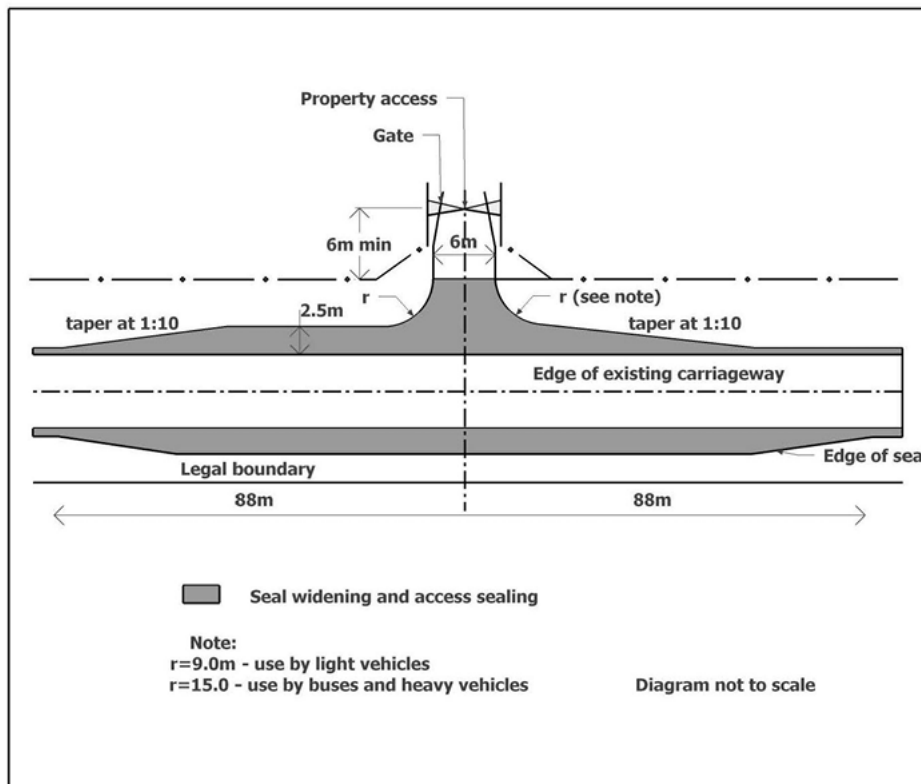
Under section 108 of the RMA, it is recommended that any consent granted is subject to the following conditions:

General Conditions

1. That the activity proceed in accordance with the plans and details submitted with the application prepared by Novo Group Ltd dated 6 November 2023, except where amended by the further information provided on 14 December 2023 and any requirements set out in the conditions below. Approved plans are attached and entered into Council records as Ref LUC23-0109.

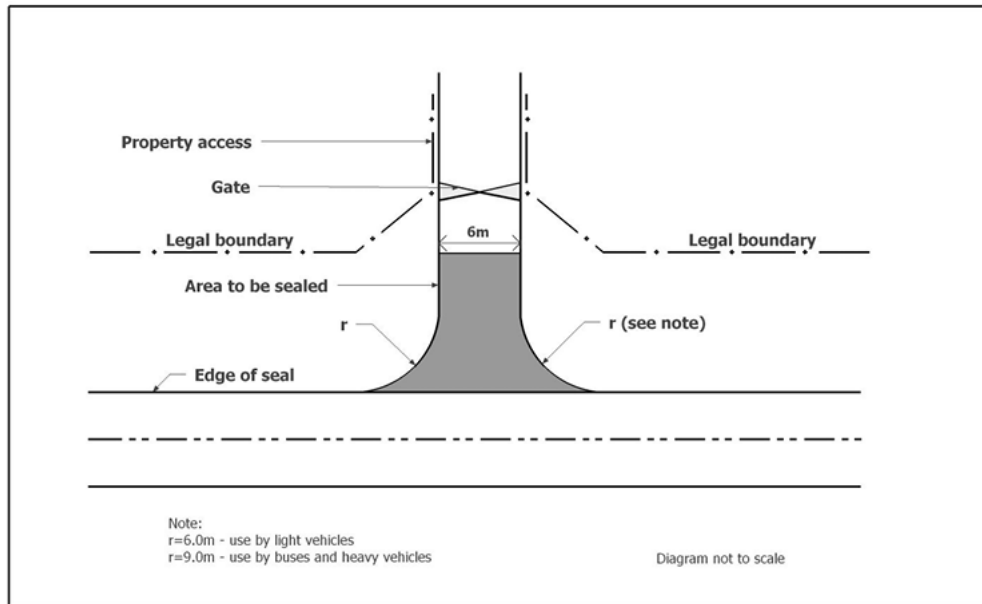
Vehicle Crossings

2. The vehicle crossing onto Stranges Road shall be formed and sealed in accordance with Appendix 10-8 of the District Plan and otherwise be constructed in accordance with the approved Engineering Plans. The culvert diameter crossing the water race shall be approved by Council.



3. The Consent Holder shall remove the current entranceway including removal of associated culverts, remediation of the water race, to the requirements of the Engineering Code of Practice and engineering approval.

4. The vehicle crossing onto Huntingdon Avenue shall be formed and sealed in accordance with Appendix 10-7 of the District Plan and otherwise be constructed in accordance with the approved Engineering Plans.



5. The use of the Huntingdon Avenue access to the site shall be limited to staff use for operational purposes, except in the case of emergency.
6. The Consent Holder shall submit to the Ashburton District Council Infrastructure Manager Roading plans and specifications of the vehicle access crossings and removal of the existing crossing for engineering approval prior to construction. Engineering approval of complying documents shall be given in writing and work shall not commence until this has been received from the Council. Any subsequent amendments to the plans and/or specifications shall be submitted to Council for approval.

Water Supply

7. The Consent Holder shall provide accurate 'as built' plans of the extension to Council services to the satisfaction of the Council. All assets being vested in Council shall be provided in an appropriate electronic format for integration into Council's systems. Actual costs involved in provision and transfer of this data to Councils systems shall be borne by the Consent Holder.
8. That confirmation of the adequacy of the supply for firefighting purposes be provided to the Council prior to construction of buildings commencing.

Annual Sales Events

9. A TMP shall be provided to the Council for approval prior to the commencement of any annual sales event on site. The TMP shall be approved by the Council within 10 working days of receipt.
10. No annual sales events shall commence until a Traffic Management Plan (TMP) has been implemented on site. The TMP must be held on site at all times and made available to the Council on request.

Accidental Discovery Protocol

11. In the event of the discovery/disturbance of any archaeological material or sites, including taonga (treasured artefacts) and koiwi tangata (human remains), the consent holder shall immediately:
 - a) Cease earthmoving operations in the affected area of the site; and

- b) Advise the Council and appropriate agencies, including Heritage New Zealand Pouhere Taonga and the local Mana Whenua of the disturbance.

Ecology

12. All existing indigenous vegetation within the waterways and riparian areas is to be retained.
13. In summer, a herpetologist shall survey the bridge locations for lizards and consider mitigation options if found.
14. Haul Road and bridge placement shall be undertaken following the bird breeding season (i.e., February to June). Should construction works extend beyond June, then a survey shall firstly be conducted to locate any nesting birds around the bridge construction sites. All works shall avoid nesting birds.
15. Stormwater runoff from the Haul Road and vehicle car park areas, shall be treated before discharge to waterways, possibly by ground infiltration.

Construction

16. All earthworks shall be carried out in accordance with the supplied Erosion and Sediment Control Plan (ESCP), which follows the best practice principles, techniques, inspections and monitoring for erosion and sediment control contained in Environment Canterbury's Erosion and Sediment Control Toolbox for Canterbury <http://esccanterbury.co.nz/>. The ESCP must be held on site at all times and made available to the Council on request.
17. No earthworks shall commence until the ESCP has been implemented on site. The ESCP measures shall be maintained over the period of the construction phase, until the site is stabilised (i.e. no longer producing dust or water-borne sediment). The ESCP shall be improved if initial and/or standard measures are found to be inadequate. All disturbed surfaces shall be adequately topsoiled and vegetated or otherwise stabilised as soon as possible to limit sediment mobilisation.
18. A copy of the ESCP shall be provided to the Council for approval prior to the commencement of any earthworks on site. The ESCP shall be approved by the Council within 10 working days of receipt.
19. Construction noise shall be measured and assessed in accordance with New Zealand Standard NZS 6803:1999 "Acoustics - Construction Noise" (Rule 11.8.3). As the construction period is longer than 20 weeks, the long-term limits apply. Construction noise limits of 70 dB LAeq and 85 dB LMax shall apply during the daytime period of 07:00 – 18:00, Monday to Saturday.
20. Prior to the issue of building consent, the Consent Holder shall lodge with the Environmental Services Department of the Council a Construction Noise Management Plan (CNMP) which:
 - a) Describes the relevant noise standards from NZS 6803:1999 and other appropriate guidance;
 - b) Identifies and adopts the best practicable option (BPO) for the management of construction noise;
 - c) Identifies high noise construction activities where there is a risk of non-compliance;
 - d) Defines the procedures to be followed when construction activities cannot comply with the noise standards;
 - e) Informs the duration, frequency, and timing of works to manage disruption; and
 - f) Requires engagement with affected receivers and timely management of complaints, this shall include:

- i. Developing and maintaining a complaints management procedure which shall be in place at the commencement of works and remain until construction works are completed onsite. The procedure shall ensure that neighbours and other parties are provided with an up to date and monitored phone number so that they may communicate with the consent holders representative during the construction phase of the project.
- ii. Complaints received regarding activities on the site shall be recorded along with action taken in response. A copy of the complaints register and recorded actions shall be provided to the Council upon request.

Administration

21. That the conditions of this consent may be reviewed annually by the Ashburton District Council in accordance with section 128 of the Resource Management Act 1991 for the purpose of addressing any adverse effects on the environment that may arise from the exercise of this consent.
22. That a monitoring fee for the actual and reasonable costs of conducting any monitoring shall be payable by the consent holder and shall be in accordance with fees adopted for the purpose by the Ashburton District Council.

Notes to the Consent Holder:

- a) Pursuant to the section 125 of the Resource Management Act 1991, if not given effect to, this resource consent shall lapse five years after the date of this decision unless a longer period is specified by the Council on a further application.
- b) This resource consent is not an authority to build, and all requirements of the Building Code and elated consenting requirements are also required to be met prior to any construction.
- c) A copy of this consent and the associated approved drawings should accompany the application for a Project Information Memorandum and Building Consent. If not supplied unnecessary delay may occur in the processing of the application.
- d) The consent holder is requested to notify Council, in writing, of their intention to begin works, a minimum of seven days prior to commencement. Such notification should be sent to info@adc.govt.nz and include the following details:
 - i. Name and telephone number of the project manager and the site owner;
 - ii. Site address to which the consent relates;
 - iii. Activity to which the consent relates; and
 - iv. Expected duration of works.
- e) The consent holder is requested to notify Council, in writing, once they have completed the works authorised by this resource consent. Such notification should be sent to info@adc.govt.nz including the following details:
 - i. Resource consent number.
 - ii. Site address to which the consent relates.
 - iii. Statement outlining how the consent holder has complied with each of the conditions.
- f) Development Contributions in accordance with the Council's policy included within the Long Term Council Community Plan (LTCCP) will be required and payable.

Report prepared by: Nick Boyes
Consultant Planner

Signed: 

Date: 13 March 2024

ATTACHMENT 1: Application Proposal Plans

ATTACHMENT 2: Correspondence between Applicant and ADC re Wastewater

ATTACHMENT 3: Submissions Lodged