



## WHITE ROBE LODGE

### WHITE ROBE LODGE THOROUGHBRED STUD

#### Submission regarding the proposed inland container port

##### **Our primary concern**

White Robe Lodge Thoroughbred Stud has operated continuously for more than 70 years. Established at Wingatui in 1956, the stud has been based at its current location for approximately 50 years and has become one of New Zealand's longest established and most respected thoroughbred breeding farms. The stud employs approximately 20 local people and is home to around 250 horses during the breeding season, making a significant contribution to both the local economy and New Zealand's thoroughbred breeding industry.

Our primary concern is whether a large-scale inland container port is compatible with a specialist thoroughbred breeding operation located immediately opposite the proposed development.

The proposed port use is directly across a major public road from our foaling unit, where mares give birth and newborn foals take their first steps at a most vulnerable period of their lives. The planning documents referred to these facilities simply as "a residence and buildings", failing to recognise that they comprise the Stud Manager's residence together with purpose-built foaling boxes, yards and specialised breeding infrastructure that is fundamental to the operation of White Robe Lodge. This description significantly understates the nature and importance of the facilities located immediately opposite the proposed development.

Of particular concern is that the proposal and many of its supporting assessments were prepared without a detailed understanding of the operation they would directly affect. No representatives of the project had visited White Robe Lodge or sought to understand how our thoroughbred breeding operation functions before completing the key assessments supporting the proposal. It was only after a White Robe Lodge representative spoke at the Mosgiel Community Board meeting and highlighted this issue that the project team contacted us and requested a visit to the stud.

We welcomed the opportunity to show them our operation and explain the unique requirements of a specialist thoroughbred breeding farm. However, by that stage the key planning documents and technical assessments had already been completed. In our view, this has resulted in an assessment that does not fully recognise the nature of our breeding operation, the specialised facilities located

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immediately opposite the proposed development, or the cumulative effects that a large-scale inland container port may have on animal welfare, staff safety and the day-to-day operation of the stud.

The proposal gives rise to several significant concerns, which are outlined below.

### **Animal Welfare**

The potential impact on animal welfare is a significant concern for White Robe Lodge. Thoroughbred breeding operations rely on providing horses with a calm, predictable and low-stress environment, particularly during pregnancy, foaling and the early development of young horses.

The proposed inland container port would introduce a level of industrial activity immediately adjacent to our breeding operation that is fundamentally different from the rural environment in which our horses have been successfully bred and raised for more than 70 years. Increased noise, heavy vehicle movements, vibration, lighting, dust and unpredictable activity all have the potential to affect horse behaviour and wellbeing.

Mares close to foaling, newborn foals and young horses are particularly vulnerable to stress and sudden disturbances. A heightened stress environment may create risks not only to the welfare of the horses but also to the safety of the staff and veterinarians responsible for their care.

### **The Animal Welfare Code states:**

***"Horses that are foaling are given a suitable safe and quiet place to enable them to foal, for the foal to suckle and for the mare to bond with her foal."***

***Quiet and Low Stress: Isolation from loud noises, heavy traffic, and aggressive herd members prevents the mare from becoming frightened or anxious.***

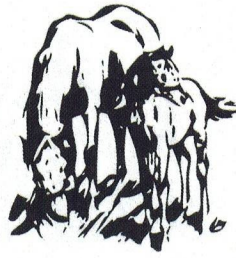
### **Bonding Space:**

***Adequate room allows the mare and foal to recognise each other, rest, and establish natural maternal behaviors without interference.***

### **Successful Suckling:**

***A calm setting encourages the foal to stand and nurse unhindered during its critical first hours of life.***

These requirements are particularly relevant to our breeding operation. Foaling mares require a safe and quiet environment at a time when they and their



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newborn foals are especially vulnerable to disturbance. The introduction of high-intensity industrial activity immediately alongside the breeding operation raises serious concerns about whether this essential welfare environment can be maintained.

The long-term effects of placing a high-intensity industrial activity immediately beside a specialised thoroughbred breeding establishment require careful consideration before any decision is made.

### Lighting

The proposed inland port will require extensive artificial lighting to enable safe operation during the hours of darkness. During a workshop organised by the applicant, we were advised that street lighting would be installed at the entrance to the development, approximately 50 metres from our property boundary. We were also advised that the lights would be directed downwards. While this may reduce light spill, it does not remove the presence of artificial lighting or the significant change to the existing rural night-time environment.

In addition to street lighting, the operation of the inland port is also expected to require security lighting, operational lighting, vehicle headlights and illuminated machinery. Collectively, these will introduce a level of night-time illumination and activity that is fundamentally different from the quiet rural setting in which White Robe Lodge Thoroughbred Stud has successfully operated for more than 70 years.

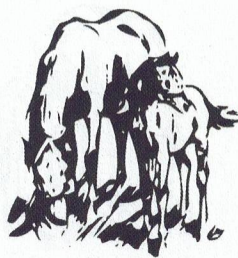
Our foaling unit is located directly opposite the proposed development, with broodmares, newborn foals and young horses occupying this area throughout the breeding season. Outside the foaling season, the surrounding paddocks continue to be used by broodmares and young stock as part of the normal operation of the stud.

The continual presence of artificial lighting and night-time activity immediately opposite our breeding facilities has the potential to disturb horses and alter the working and living environment for staff who reside on the foaling unit. When considered alongside increased heavy vehicle movements, industrial noise, dust and other operational activities, we do not believe the cumulative effects of night-time lighting have been adequately recognised or assessed.

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The proposed mitigation measures may reduce some individual effects; however, they do not address the cumulative impact of introducing a permanently illuminated industrial facility immediately opposite a specialist thoroughbred breeding operation.

### **Heavy Vehicle Movements**

The applicant's traffic assessment anticipates approximately 250 heavy vehicle movements per day on the public road immediately adjacent to White Robe Lodge Thoroughbred Stud. This represents a substantial increase in heavy vehicle traffic and a significant change to the quiet rural environment in which our thoroughbred breeding operation has successfully operated for more than 70 years.

The continual movement of heavy vehicles, together with engine noise, air brake release, gear changes and vibration, will create an environment that is fundamentally different from that currently experienced by horses, staff and visitors to the stud. These effects will occur immediately alongside our property and will become a regular part of the daily operating environment.

The increased volume of heavy vehicle traffic also raises practical animal welfare and health and safety concerns. Routine activities such as moving mares and foals between paddocks and facilities, veterinary examinations, breeding procedures and the general handling of horses all occur in close proximity to the adjoining public road. The increased frequency of heavy vehicle movements has the potential to make these activities more difficult and increase the risks to both horses and the staff responsible for their care.

When considered alongside the industrial noise, container handling, lighting, dust and other operational activities associated with the proposed inland port, the cumulative effects on animal welfare, staff safety and the day-to-day operation of our thoroughbred breeding business are significant. In our view, these cumulative effects have not been adequately recognised or assessed.

### **Dust and Air Quality**

Construction activities and ongoing industrial operations have the potential to generate dust and airborne contaminants. This is of particular concern for newborn foals with developing respiratory systems, pregnant mares, other livestock and the people who work on the property every day.



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Maintaining high standards of air quality is an important component of animal health and welfare.

### **Health and Safety**

Thoroughbred horses are herd animals. If one horse is startled and bolts, others commonly follow, potentially resulting in large-scale panic. This presents serious risks to horses, handlers, veterinarians and other staff, particularly during foaling, breeding and veterinary procedures where both animals and people are especially vulnerable.

### **Noise**

The proposal states that shipping containers will be stacked up to five containers high. While acoustic barriers of between 2 and 3 metres have been proposed around the SLIP, the plans indicate that the barrier directly opposite our foaling unit will be only 2 metres high. Given that containers stacked five high will reach approximately 17.4 metres in height, together with the operation of container-handling equipment above the height of the barrier, it is difficult to see how a 2-metre acoustic fence could effectively shield our property from noise generated within the port.

The significant difference in height between the proposed acoustic barriers and the container stacks is of particular concern. A 2-metre barrier sitting adjacent to container stacks potentially reaching 17.4 metres in height raises serious questions about how effectively noise will be contained. Machinery and container-handling equipment operating at heights well above the acoustic barrier may further reduce its effectiveness.

Even where some reduction in background noise is achieved, an acoustic barrier cannot eliminate sudden impact noises associated with container handling, the loading and unloading of containers, machinery operation, reversing alarms, the coupling and uncoupling of trailers, dropping containers, or other unexpected industrial sounds. These unpredictable noises are of particular concern because horses are prey animals with a highly developed flight response. Sudden or unfamiliar noise can cause them to spook or panic, presenting significant animal welfare and health and safety concerns.

During the breeding season, our foaling unit accommodates heavily pregnant mares and newborn foals, all of which are particularly vulnerable to disturbance. The mares that come to the foaling unit on the other side of Dukes Road North from the SLIP are only a few metres apart. They are not present there all the time

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and, particularly when close to foaling, will not have had the opportunity to become habituated to noises generated from the SLIP.

This is an important distinction between predictable background noise and the sudden, unpredictable sounds associated with an active container port. A horse may become accustomed to a consistent background sound, but a sudden container being dropped, a reversing alarm, machinery movement or another unexpected industrial noise can trigger an immediate flight response.

These unpredictable noises can cause an adrenaline surge in a mare that may interfere with the normal physiological processes associated with foaling. Stress and adrenaline can interfere with the normal release and action of oxytocin, the hormone involved in uterine contractions, and may therefore interfere with the birthing process. Horses instinctively seek safety and quiet places to foal, and a startling noise can prolong stage 1 of labour or, in some circumstances, stall the process completely.

The release of stress hormones can also interfere with the normal relaxation of the birth canal, potentially complicating foaling or contributing to the foal being improperly positioned. A stressful and unpredictable noise environment may also affect the mare/foal bonding process and interrupt normal suckling. There is also a concern that repeated exposure to a stressful noise environment could contribute to foals becoming more reactive and easily stressed.

These risks are not confined to the foaling season. Outside this period, the surrounding paddocks are used to graze broodmares, typically in groups of 10 to 15 horses, each weighing approximately 500 kilograms. At times, these groups also include mares with older foals at foot.

If one horse startles, the reaction can quickly spread through the mob, creating a serious stampede risk. A group of large, highly reactive animals moving suddenly in response to an unexpected noise has the potential to result in significant injury or death to horses and foals, while also placing staff working with them at considerable risk.

The proximity of the proposed port operation therefore makes the nature of the noise particularly concerning. The horses will be located only a short distance from an industrial operation involving heavy machinery, trucks, trailers and container handling. The noise generated will not simply be a consistent background sound; it will include sudden and unpredictable impact and machinery noises which cannot be effectively prevented from reaching the neighbouring property by a relatively low acoustic barrier.

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An acoustic barrier may provide some reduction in general background noise, but it cannot eliminate the sudden noises associated with dropping or moving containers, reversing alarms, machinery operation, trailers and other unexpected activities. The fact that the barrier directly opposite our foaling unit is only 2 metres high, while containers may be stacked to approximately 17.4 metres, further increases our concern about its ability to provide meaningful protection to the horses.

Given the unique nature of a thoroughbred breeding operation immediately opposite the proposed inland port, we do not believe the proposed acoustic mitigation adequately addresses the ongoing risks to animal welfare, staff safety and the day-to-day operation of our business. The particular vulnerability of heavily pregnant mares, mares during foaling, newborn foals and young horses means that the potential consequences of sudden and unpredictable industrial noise are significantly more serious than they would be for a conventional neighbouring land use.

For these reasons, we believe the proposed acoustic mitigation requires further consideration to ensure that it provides an appropriate level of protection for the horses, the people working with them and the continued safe operation of our thoroughbred breeding business.

### **Land Use Compatibility**

White Robe Lodge is located on prime rural land that has proven ideally suited to a quiet, low-stress breeding environment over many decades. The proposal would introduce a large-scale inland container port and associated industrial activities immediately adjacent to our breeding operation on neighbouring rural land. These two land uses have fundamentally different operational requirements and environmental expectations. We question whether they can successfully coexist when separated only by a public road.

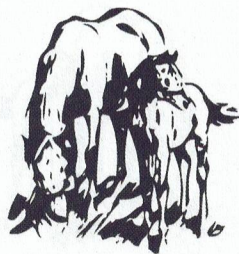
The thoroughbred breeding industry depends on providing a calm, safe and predictable environment for valuable breeding stock. Once the rural amenity and environmental conditions that support that operation are compromised by large-scale industrial activity, they cannot readily be restored.

For more than seven decades, White Robe Lodge has built an international reputation for producing quality thoroughbreds and has made an enduring contribution to New Zealand's breeding industry and the local community. We

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respectfully ask decision-makers to carefully consider whether a high-volume inland container port, with its associated heavy traffic, industrial noise, lighting, dust and continuous operational activity, is an appropriate neighbour for such an established and specialised breeding enterprise.

This proposal is not simply a question of development versus rural land. It is a question of whether two fundamentally different and potentially incompatible land uses should be located side by side, and whether the long-term effects on animal welfare, staff safety, an established rural business and New Zealand's thoroughbred breeding industry have been fully understood, appropriately assessed and adequately addressed.

### **Conclusion**

White Robe Lodge Thoroughbred Stud has operated continuously for more than 70 years and has been based at its current location for approximately 50 years. The stud is a specialist thoroughbred breeding operation with purpose-built facilities that are fundamental to the care of broodmares, newborn foals and young horses.

Our concern is not with any single aspect of the proposal in isolation. Rather, it is the cumulative impact of industrial noise, approximately 250 heavy vehicle movements per day, lighting, dust, vibration and the ongoing operation of a large-scale inland container port immediately opposite our breeding facilities.

While the applicant has proposed mitigation measures for some individual effects, we consider that they do not adequately address the cumulative impacts on animal welfare, staff safety and the day-to-day operation of our thoroughbred breeding business. In our view, the proposal and its supporting assessments have not fully recognised the unique nature of White Robe Lodge or the sensitivity of the activities undertaken on this site.

As operators of a specialist thoroughbred breeding stud, we have an ongoing responsibility to maintain high standards of animal welfare and to provide a safe working environment for our staff, contractors and visitors. We remain concerned that the proposal will introduce new risks that have not been adequately recognised or assessed.

We respectfully ask the Panel to give careful consideration to the evidence presented in this submission, together with the independent expert evidence provided in support of it regarding the specialised requirements of thoroughbred



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breeding operations and the importance of maintaining a calm and suitable environment for broodmares, foals and young horses.

Ultimately, we ask the Panel to consider whether a large-scale inland container port is an appropriate and compatible neighbour for a specialist thoroughbred breeding operation that has successfully operated at this location for approximately 50 years and has contributed to New Zealand's thoroughbred breeding industry for more than seven decades.

For these reasons, we respectfully submit that the cumulative effects of the proposed development have not been adequately assessed and ask that our submission be given full and careful consideration when determining this application.

Yours sincerely

Brian Anderton ONZM  
Proprietor  
White Robe Lodge

Karen Stewart  
Stud Co Manager

14/8/2026

Please see attached supporting information:

- Letter from March Corban Bloodstock
- Various photos showing White Robe Lodge proximity to the proposed Port