



16 November 2016

Environment Canterbury (ECan)
PO Box 345,
Christchurch 8140
New Zealand

Dear Sir or Madam,

BCIL AKARANA STORAGE POND RESOURCE CONSENT APPLICATION

Please find attached the resource consent application for the proposed Akarana storage pond in Methven. Resource consent is being sought by Barrhill Chertsey Irrigation Limited (BCIL) to construct the 1.6 million cubic metre storage pond which will improve the operation efficiency and reliability of water supply to BCIL's shareholders/irrigators.

An initial draft assessment of environmental effects (AEE) was provided to Environment Canterbury (ECan) and Ashburton District Council (ADC) to undertake an initial review and provide feedback. Saskia Bell, ECan Consents Planner, provided feedback on the draft resource consent application on 14 October 2016. We understand that Simon Woodlock will review the application. Ian Hyde, ADC District Planning Manager, and Rebecca Whillans provided feedback on the draft resource consent application on 19 October and 8 November respectively.

Pattle Delamore Partners Limited (PDP) has subsequently updated the AEE and application form based on the feedback received. The main change to the application is that the Regional and District Council consent applications have been bundled together into one application.

The overall classification of the activity is **discretionary**. In our initial draft application, the activity was classified as non-complying for the District Council consent under the rural zone earthworks rules. Based on advice received from ADC, the utilities rules (Section 14 of the District Plan) take precedence over the rural zone rules in this instance,¹ thereby classifying the establishment of the storage pond as a discretionary activity.

Furthermore, our recommendation for notification has been amended to limited notification. We consider that all properties identified in the dam break assessment as potentially being inundated with water following the unlikely event of a dam failure as an affected party. We recommend that notification is limited to these potentially affected parties as well as with Te Runanga o Arowhenua. As noted in the AEE, consultation has been initiated with the affected parties, and consultation with Te Runanga o Arowhenua will be initiated following to lodging this application. Affected party approval forms that have already been obtained are included with the application, and further approvals will be provided as they are obtained.

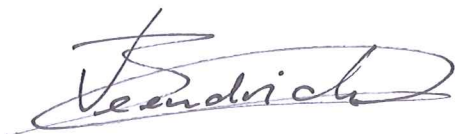
¹ Note 1 under 14.7.5 of the Plan specifies "The rules contained in this section take precedence over any other zone rules that may apply to utilities in the District Plan, unless specifically stated to the contrary."

Other amendments to the application include an assessment of the activity under the ADC District Plan and the addition of proposed consent conditions for the District consent.

We note that feedback from Saskia Ball (ECan) recommended that a Dam Safety Management Plan, Emergency Action Plan and Emergency Evacuation Plan be included as part of the application. Damwatch Engineering, the dam designer for this application, recommends that these three documents are not included in the application, given that the design of the Akarana storage pond is at a preliminary stage, and that they are instead completed prior to commissioning of the dam. Damwatch Engineering's state that their recommendation is consistent with the New Zealand Dam Safety Guidelines (May 2015), and a copy of their correspondence is appended to the application.

Yours faithfully

PATTLE DELAMORE PARTNERS LIMITED

A handwritten signature in blue ink, appearing to read 'Bas Veendrick', with a stylized flourish at the end.

Bas Veendrick

Water Services Leader