

From: [Ben Williams](#)
To: [Gillian Ensor](#)
Cc: [Colin Glass \(colin.glass@dairyholdings.co.nz\)](#); [Brian Gallagher \(brian@dairyholdings.co.nz\)](#)
Subject: RE: Alford Park applications CRC082614, CRC082615.1 and CRC950930.3
Date: Thursday, 22 June 2023 12:58:39 pm
Attachments: [image002.png](#)
[image003.jpg](#)

And also...
BEN WILLIAMS
PARTNER

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From: Gillian Ensor <gillian@enviser.co.nz>
Sent: Wednesday, 21 June 2023 2:53 pm
To: Ben Williams <Ben.Williams@chapmantripp.com>
Subject: FW: Alford Park applications CRC082614, CRC082615.1 and CRC950930.3

Hi Ben,

Further to my email of yesterday I have a couple of questions/points to mention regarding the B permit application (attached) as follows:

- I note that a 10 year duration is sought. There are B permit allocation limits and minimum flows for Taylor's Stream in Table 13(b) of the LWRP that should apply from 1 July 2023, and then different minimum flows which should apply from 1 July 2033. A 10 year consent duration (if granted) would go beyond 1 July 2033. Would you consider proposing an expiry of 30 June 2033 (so less than 10 years)? **Yes**
- Will the water be used efficiently? My assessment must consider whether the proposed use of water is efficient. The use of water is set out in Section 5.8 of the AEE where it is concluded that water will be used efficiently and not wasted. Given the application was lodged in 2008, and Alford Parks A permits (pending objection outcome) will have the LWRP A permit minimum flows, and the storage pond has been build since the application was lodged, how the B permit water will be used in conjunction with the existing consents has probably changed since 2008. It would be helpful if you could provide some updated information setting out why the additional water is needed and how it will be used efficiently etc... **The existing combination of monthly volumetric restrictions on the A permit and the storage pond (which is not that large relative to the size of the property), even under the previous flow regime, were not enough to provide reliable irrigation on the property and restriction events mean the water cannot be taken on relatively regular occasions through the season. B Permit water will assist in being able to refill storage quickly. Future minimum flows are likely to significantly reduce reliability further. All water is used efficiently through high-efficiency spray irrigation.**
- The other point as noted in yesterday's email was that the B block minimum flow for Taylor's stream of 3,700 is not proposed (3,000 l/s is proposed instead which was what was in the pNRRP). Would you consider proposing a minimum flow of 3,700 l/s which is what is in the LWRP? **Yep; plan compliant**

If you want to talk about this just give me a call.

I look forward to hearing from you.

Regards,

Gillian

Gillian Ensor
Environmental Consultant



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From: Gillian Ensor
Sent: Tuesday, June 20, 2023 1:41 PM
To: Ben Williams <Ben.Williams@chapmantripp.com>
Subject: Alford Park applications CRC082614, CRC082615.1 and CRC950930.3

Hi Ben,

Thanks for speaking with me just now. As discussed, I've started to look more closely at the applications that I'm processing (I'm preparing my notification recommendation) and I am wondering if you would like to withdraw the two change of conditions applications and leave only the B permit application in process.

Below is a description of the applications I have before me. I attach the original applications from 2008 (B permit application)

and 2010 (change of conditions applications).

CRC082614 – this is a new application to take and use B permit water. The application was lodged in 2008 with an application to construct a dam (CRC082615). CRC082615 was granted in 2009. The proposed conditions for CRC082614 are:

- a. Water shall be diverted and taken from Taylor's Stream at Intake 'A' at or about map reference NZMS 260 K36:9027-2209
- b. The maximum rate take would be 500 l/s
- c. The diversion and taking of water will be restricted as follows:
 - i. When the flow in the Ashburton River, at the State Highway 1 recorder site is at or below 14,000 l/s; and
 - ii. When the flow in Taylor's Stream, immediately above the confluence with the South Branch Ashburton River is at or below 3,000 l/s
- d. Water shall be diverted into a storage pond consented under CRC082615.
- e. A 10 year duration is requested.

As discussed, the proposed minimum flow restrictions are not consistent with the B block minimum flows that are set in the LWRP and which should apply from 1 July 2023. The SH1 minimum flow is ok at 14,000 l/s, but the minimum for Taylor's Stream in the LWRP is 3,700 l/s, not 3,000 l/s as proposed in the application. Please let me know if you wish to amend this minimum flow to be consistent with the minimum flow in the LWRP for Taylor's Stream.

Applications **CRC082615.1** and **CRC950930.3** were lodged together in 2010 and are addressed in one AEE (attached).

For application CRC950930.3, which is to change the conditions of CRC950930.2, the following changes are proposed:

- a. Condition 2 currently authorises the taking of up to 1,000 l/s with a volume not exceeding 582,630 cubic metres in any 31 consecutive day period.
- b. It is proposed to **replace the 31 day volume with an annual volume of 4,544,514 cubic metres between 1 July and the following 30 June.**
- c. A new condition is proposed which will ensure that water taken under this consent can be stored in the dam authorised by CRC082615.
- d. Updated water metering requirements are proposed.

I also note that CRC950930.2 has been reviewed (review number CRC200254) but is the subject of an objection to the notification decision. Once that objection is resolved, if granted CRC950930.2 will be replaced by CRC200254. This change of conditions application will therefore apply to the most recent consent authorising the taking and use of A block water, which will be CRC200254 not CRC950930.2.

For application CRC082615.1, which is to change the conditions of CRC082615, the following changes are proposed:

- a. A new condition stating water stored in the dam can be used for irrigation, stock water and domestic use.
- b. A new condition stating the maximum rate water can be taken from the pond is 490 l/s
- c. A new condition limiting the use of water to an application rate of five mm per day.
- d. A new condition ensuring the taking of water from the pond will be measured and monitored.

As discussed, I am wondering if both change of conditions applications are still required and whether you can withdraw them. You are in the process of preparing an application to transfer some (or all) of the A block water authorised by CRC950930.2 upstream to a new intake, and this change of conditions application (CRC950930.3) may confuse matters, especially since you don't want an annual volume put on the consent as part of the transfer consent pathway, yet it's proposed as part of this change of conditions....

Please let me know if you have any questions about these.

Regards,

Gillian

Gillian Ensor

Environmental Consultant

Hours of work: Mon – Thursday, 9 – 2.30



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