

23 May 2023



e2Environmental Limited  
PO Box 31159  
Ilam  
**Christchurch 8444**

**Customer Services**  
**P. 03 353 9007 or 0800 324 636**  
200 Tuam Street  
PO Box 345  
Christchurch 8140  
E. [ecinfo@ecan.govt.nz](mailto:ecinfo@ecan.govt.nz)  
[www.ecan.govt.nz](http://www.ecan.govt.nz)

Tēnā koe Lindsay

## **Request for Further Information**

**Response required by: 14 June 2023**

**Record Number/s:** CRC233674 & CRC233675

**Applicant Name:** Isaac Conservation Trustees Limited

**Activity Description:** to take and use surface water for non-consumptive use & to discharge surface water

As you are aware I have been processing the above resource consent application.

The information listed in Attachment 1 to this letter is hereby requested under Section 92 of the Resource Management Act 1991 (the RMA). As this information is required in order to fully understand the potential effects of the proposal, we are unable to further process the application until it has been supplied.

The options available to you under Section 92A(1) of the RMA are summarised below. A response is required by 14 June 2023. You must choose one of these options.

### **A. Supply the requested information by 14 June 2023**

If the information can be easily collated and supplied by this date, please provide it in writing (via email is fine) to Cherie Lennon.

### **B. Agree in a written notice by 14 June 2023 to supply the information requested**

Sometimes technical information will take some time to collate or key contacts may not be immediately available. If you need more time to supply the information requested, please advise Cherie Lennon in writing when you can provide the information. You can do this via email or letter.

### **C. Refuse in a written notice by 14 June 2023 to supply the requested information**

**If you choose not to provide the requested information by the above date, or any date subsequently agreed to by the Canterbury Regional Council, then your application must be publicly notified and may be declined.**

Public notification enables any member of the public, including potentially affected parties, to submit on your proposal. If submission/s are received on your application, then you can expect a hearing to be held. Information on [the notification process](#) and on the [likely costs](#) for notification and a hearing can be found on our website.

Please contact Cherie via email ([Cherie.Lennon@ecan.govt.nz](mailto:Cherie.Lennon@ecan.govt.nz)) or phone (03 367 7059) if you have any questions.

Yours sincerely



**Dylan Marriott**  
Senior Consents Planner

cc:  
Isaac Conservation Trustees Limited  
PO Box 20440  
Bishopdale  
**Christchurch 8543**

## ATTACHMENT 1

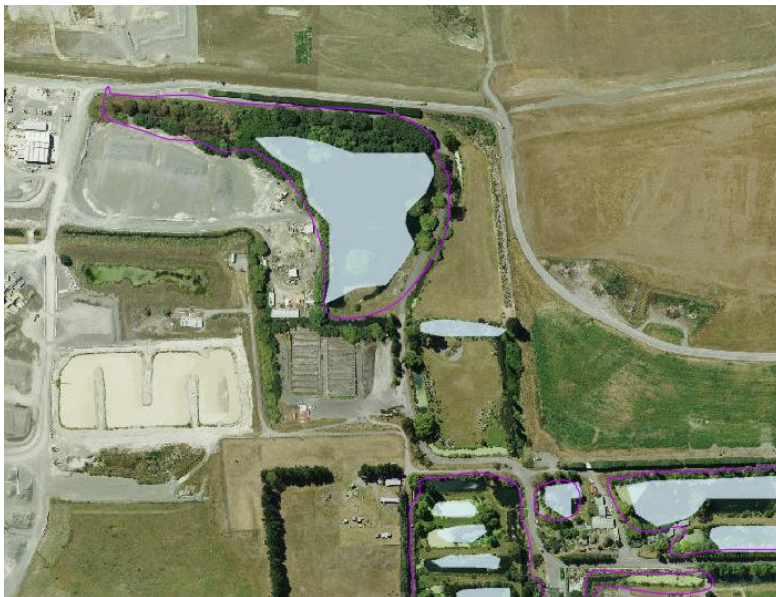
### Information Requested under Section 92 of the Resource Management Act 1991

Application Numbers: CRC233674 & CRC233675

---

#### 1. Assessment of potential adverse effects on potential natural inland wetlands

There are indicative wetlands located on the site of the proposal as shown in Figure 1 below (from aerial surveys). The wetland is only indicative, it has not been previously ground surveyed and confirmed.



*Figure 1 - Indicative wetlands (purple outline)*

In the absence of specific information regarding this indicative wetland, we must take a precautionary approach.

Given the above, please provide:

- a. an assessment of whether the indicative wetland meets the definition of wetland (LWRP) and/or natural wetland (NES-F 2020) OR whether the applicant is to take a precautionary approach and assume the area is a natural inland wetland.

If the applicant assumes the area meets the definition of a natural inland wetland or is surveyed and considered to meet the criteria, please provide:

- b. an assessment of the values associated with the wetland and the potential adverse effects of the proposed activity on potential wetland extent and values;
- c. An assessment of any relevant rules or regulations regarding the proposal within 100 metres of a natural inland wetland; and

- d. A consideration of any relevant provisions of the NPS-FM 2020 and LWRP in relation to wetland extent and values.

**Advice note:** *There are rules specific to wetlands within the Land and Water Regional Plan, as well as regulations within the National Environmental Standard for Freshwater 2020.*

**Advice note:** *The NPS-FM wetland delineation protocol means wetland delineations can only be done during the growing season (i.e. not during winter).*

## **2. Existing resource consents**

The application states that “some of the water supply is supplemented by bore water” and “the applicant does have a bore next to the raceways, and this will be used to fill the races from empty so that the stream is not temporarily depleted (during filling phases)”. The application does not adequately detail how the water source will work in conjunction with this proposal, specifically, how the groundwater take will be associated with the discharge sought under this application. Therefore, please provide:

- a. A clear description of the groundwater take, including location, depth of take, volume and rate of take;
- b. An assessment as to whether the groundwater take is consented or is a permitted activity;
- c. An assessment as to the reasonable need for the volume and rate sought under this consent application given the water to be taken from the groundwater take. Such an assessment should consider the reasonable and efficient use of water from all potential sources on site.
- d. An assessment as to whether the groundwater take will be included as part of the proposed discharge under this application and whether the rates and method of discharge have included this additional water.

## **3. Potential adverse effects associated with the proposed discharge**

The AEE does not provide adequate information regarding what inputs and contaminants will be used within the salmon raceway. To determine the potential effects resulting from the proposal, the potential contaminants need to be addressed. Therefore, please:

- a. Outline the contaminants that will be used (or potential to be picked up) within the raceways including quantities and regularity (e.g., food source, anti-fungal or other pharmaceutical solutions, etc.);
- b. provide an assessment as to the potential effects the resulting contaminants may have on water quality and ecological values within the stream;
- c. Describe how the contaminants will be prevented from entering the stream and any proposed methods to prevent them from impacting the ecological and water quality values in the stream;
- d. Please detail the proposed methods (including any specialist equipment and/or chemicals) to clean the raceways, frequency of cleaning and fish stocking rates;

- e. Outline any proposed further mitigation given the assessments required from (a)-(d).

#### **4. Water quality monitoring**

The application is lacking detail on how the stream will be monitored to ensure that the proposal is not having an adverse effect on stream health:

- a. Please describe the methods proposed by the applicant to monitor for contaminants entering the stream;
- b. Please clearly provide conditions that will ensure the proposed monitoring is installed and can be complied with (both upstream and downstream) including any trigger levels and the actions required by the consent holder.

#### **5. Potential adverse effects of the take of water on fish passage and screening**

The application seeks to take 300L/s from a stream. The application refers to a winter baseline of 460L/s, but the fish will be growing for 10 months of the year, as this time long surpasses the winter months there could be substantial differences in baseline flows in the stream. This could result in varying effects given the proposed take especially on flow and providing for fish passage for a sufficient bypass for fish.

The application proposes “No more than 80% of the available flow shall be diverted through the fish raceways”. Under this proposed mitigation the applicant would be able to take water no matter what the flow in the stream is (but only 80% of it). This means that if flows drop, and the applicant continues to pump water into the raceway, fish may get trapped in the 35m stretch of the stream, or there may be water quality effects from a reduction in flow and water levels.

Given the above, please provide:

- a. An assessment as to how fish passage will be maintained at all times through the intake and across the 35 metres of stream;
- b. An assessment as to the effects on water quality and fish passage if the take continues based on the proposed 80% of available flow especially after periods of low flow;
- c. An assessment as to whether any further mitigation is to be provided as to a minimum water level or minimum flow to ensure fish passage (and fish stranded) are avoided and water levels are maintained;
- d. Section 7.1.1 of the AEE states that “This intake will be removed and replaced with new fish screen with 3mm apertures” but later describes the use of mesh. Please clarify what material the proposed fish screen will be constructed with.

#### **6. Potential adverse effects on aquatic values**



The application provides the above design plan for the pumps and fish screens. However, it is not clear the total number of pumps and fish screens to be installed, how they will be positioned (e.g., above or below the jetty pictured), and how the fish screen(s) will be maintained over time. Therefore, please provide:

- a. Detailed design plans including the position of the pumps and proposed screen(s) including clear photos of the screen and pump;
- b. Information on the total number of pumps and screens proposed, and how much water may be taken/discharged through each;
- c. Information regarding how the fish screen(s) will be maintained over time (e.g., maintenance);
- d. An assessment as to how the fish screen meets the approach velocity fish passage requirements under Schedule 2 of the Land and Water Regional Plan

## 7. Assessment in accordance with the National Policy Statement for Freshwater Management 2020

- a. Please demonstrate how the application gives effect to the National Policy Statement for Freshwater Management 2020, specifically taking into account Te Mana o Te wai and the hierarchy of obligations

## 8. Ecological assessment

The ecological assessment attached to the application does not specify the methodology used to conduct the fish survey and location. Therefore, please provide:

- a. Specific detail on the methodology and location the fish survey was conducted including reach length and duration of survey.

## 9. Tangata Whenua values and Iwi Management Plan assessment

The application has not adequately considered the effects of the proposal on Tangata Whenua Values. Water is a significant cultural resource that connects Ngāi Tahu to the landscape and the culture and tradition of the tūpuna. Additionally, tuna (eel), which were identified in the ecological assessment, are a mahinga kai resource for Ngāi Tahu. Therefore, it is not adequate to say that the proposal is not relevant to Tangata Whenua. Given the above, please provide:

- a. An assessment of the potential effects of the proposal on cultural values;
- b. An assessment of the proposal against the relevant Ngāi Tahu Plans and Policies including, but not limited to, the Mahaanui Iwi Management Plan (2013) and the Te Rūnanga o Ngāi Tahu Fresh Water Policy.