Response ID ANON-URZ4-5FQ1-J

Submitted to Fast-track approval applications
Submitted on 2024-05-03 14:27:25

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
Mid Canterbury Water Storage Limited

2 Contact person

Contact person name:
Rebecca Whillans, Mel Brooks

3 What is your job title

Job title:
Chief Executives (joint)

4 What is your contact email address?

Email:
info@mcwsl.co.nz

5 What is your phone number?

Phone number:
s 9(2)(a)

6 What is your postal address?

Postal address:

326 Burnett Street, Ashburton 7770

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

Line 1: 917 & 986 Shepherds Bush Road
Line 2: RD5
Suburb/City: Ashburton
Region: Canterbury
Postcode: 7778
Country: New Zealand

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Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:
Klondyke Storage records of title.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Mid Canterbury Water Storage Limited

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

Legal owner

Section 2: Project details

What is the project name?

Please write your answer here:
Klondyke Storage

What is the project summary?

Please write your answer here:

Mid Canterbury Water Storage Limited (MCWS) is proposing to construct up to 53 million cubic metres of water storage in stages ('Klondyke Storage'). Klondyke Storage will store existing consented water able to be taken from the Rangitata and Ashburton Rivers via the Rangitata Diversion Race (RDR). Part of the RDR will be realigned to facilitate the diversion and take of water into storage.

MCWS is seeking to obtain either resource consents or a designation (or both) along with all other permissions for the Klondyke storage facility.

The two shareholders of MCWS are Ashburton Lyndhurst Irrigation Limited (ALIL) and MHV Water Limited (MHV). Both MHV and ALIL are existing requiring authorities under the Resource Management Act 1991.

What are the project details?

Please write your answer here:

Purpose: The Klondyke storage facility will assure irrigation reliability to the existing MHV and ALIL community irrigation schemes in mid Canterbury. The provision of regionally significant scheme-wide storage will also help facilitate a number of environmental initiatives across the mid Canterbury area aimed at improving and enhancing water quality.

More generally, the proposal is in line with the Canterbury Water Management Strategy and with the provision of Klondyke Storage there are possible further opportunities for further reliability enhancements outside of the scheme area.

In 2018, Rangitata Diversion Race Management Limited (RDRML) consented a large storage facility at the site after a lengthy and complicated consenting process that extended over 3 years.

Although existing consents are held for a storage facility, they are not fit for purpose.

A revised storage proposal is now proposed, with the amount of storage being staged over time. MCWS considers it will not be feasible to develop the entire consented facility (and implement all required mitigations) in the manner originally contemplated.

Instead, mitigations will be carefully implemented to mitigate the effects of each stage (rather than the approach taken in the 2018 consents which was to require extensive mitigations from the outset). The current proposal will also remove some mitigations that related to the previous proposal to take further from the Rangitata River (noting this application was ultimately withdrawn as a part of the original consenting process and is not proposed to be reinstated).

RDRML's shareholders include the two MCWS joint venture partners Ashburton Lyndhurst Irrigation Limited (ALIL) and MHV Water Limited (MHV). In 2023

MCWS was formed and purchased the site from RDRML.

Although there are some similarities to the 2018 consented proposal there are also some material differences (mainly around staging and a more focused approach to mitigation).

MCWS considers the fast-track consenting process is essential to ensure approvals can be obtained in a timely manner and construction commence as soon as possible – especially having regard to how lengthy and complicated the previous consenting process was.

A more general outline of the project's objectives and activities is set out below.

Objectives: Objectives of the project include:

• Providing water storage to increase irrigation reliability for mid-Canterbury farmers;
• Increasing resilience to climate change and adverse weather patterns in mid-Canterbury;
• Enabling adaptation and future-proofing of the primary sector;
• Facilitate future environmental flows;
• Ensuring construction and operation of the storage facility is affordable for MCWS shareholders.

Activities:

• The construction and operation of substantial water storage in stages, which includes realignment of part of the existing RDRML canal and a new spillway / sluicing channel back to the Rangitata River. All stages will be consented together on the basis that certainty is required for the wider project;
• As a part of the first stage (likely up to 15 million m3 of storage) mitigation planting is proposed. Later stages will implement other mitigations as are required to mitigate the relevant effects;
• Although the sites are existing farmland (with limited existing ecological values) consideration will also be given (especially as a part of subsequent stages) as to wider ecological enhancements.

No changes to the existing consents to take or use water from the Rangitata and Ashburton Rivers are required, and no additional water over existing consented limits is proposed to be taken.

The water is also being used for reliability purposes. It is not directly tied to any expanded irrigation area(s). Any expansion in irrigation is in effect separate to the proposal and would also need to address other effects (such as water quality).

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

The project is proposed to be developed in three stages.

In practice these stages may overlap and/or the exact volumes may be varied to accommodate scheme requirements at the relevant time. It is still intended that the relevant mitigation would be closely tied to the effects of the relevant stage(s). The stages for the purpose of the application should be regarded as being:

• Stage 1: (intention to commence as soon as consent is granted): construction of up to 15 million cubic metres of storage , spillway, with RDR canal modifications and mitigation planting commensurate to stage 1 (noting the main effects of relevance to stage 1 are amenity related thus the focus on planting);

• Stage 2 (for the purposes of planning this is being foreshadowed as commencing in 2033 but the actual date may vary depending on scheme demand): construction of 30 million cubic metres of storage (inclusive of stage 1). Mitigation is focused on planting with some consideration being given to ecological enhancement; and

• Stage 3: (date TBA but likely mid 2030's) completion of the overall storage facility with a total of 53 million cubic metres of storage (inclusive of stages 2 and 3). Mitigations will include further planting, possible further specific wildlife interventions/ecological enhancement. Stage 3 is also likely to require stopping an existing road (Shepherds Bush Road) with alternative access possibly being provided.

All three stages will be supported by other conditions that appropriately manage effects including construction and associated traffic (during construction). Operational conditions will also address water management within and around the facility and dam safety.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Management Act 1991 resource consents and possible designation

Other possible requirements include:
Wildlife Act 1953 disturbing/removing lizard habitat, capturing and relocating lizards
Heritage New Zealand Pouhere Taonga Act 2014 archaeological authority
Public Works Act 1981 to stop part of Shepherds Bush Road

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Canterbury Regional Council
Ashburton District Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

Consents are held by MCWSL to dam up to 53 million cubic metres of water in this location.

The resource consents for the previous water storage facility consented on the site were lodged in 2016 and publicly notified in 2017. Resource consents were required from the Canterbury Regional Council and Ashburton District Council. Following public hearings before independent commissioners engaged by the Council's, and subsequent appeals to the Environment Court (settled by way of mediation) resource consents were approved in 2018 that include (as is relevant to the current project):

LUC16/0067: The construction and operation of a substantial water storage facility of no greater than 53Mm3 capacity, including a new spillway/sluicing channel back to the Rangitata River. The Proposal will result in the localised widening and raising of the canal embankments. The area of the existing RDR affected by the proposed works is, in broad terms, from the Klondyke intake to the proposed water storage facility.
CRC170652 – a land use consent for earthworks to construct the 53 million cubic metre storage pond; to upgrade part of the Rangitata Diversion Race (RDR) Canal; and to construct a 460 metre long fish bypass channel
CRC170655 – a water permit to take and use surface water at a rate not exceeding 0.5 cumecs from the Rangitata Diversion Race canals for construction purposes (i.e. dust suppression)
CRC170656 – a water permit to take groundwater for dewatering purposes.
CRC170659 – a discharge permit to discharge contaminants to air from the combustion of diesel from a generator during construction
CRC170660 – a discharge permit to discharge construction-phase stormwater and dewatering water to land via sediment retention ponds and soakage pits.
CRC170657 – a water permit to dam up to 53 million cubic metres of water outside of the riverbed
CRC182541 – a discharge permit for the emergency discharge of water to the Rangitata River

MCWS has since purchased the land from RDRML and although the long-term overall storage volume is the same (53 million cubic metres), the project will now have a much greater focus on staging (and mitigation that is focused on mitigating the effects of each stage).

There are no current applications relating to the project.

For completeness it is noted that the 2015-18 proposal originally included a 10 cubic metre take of additional 'high flow' water from the Rangitata River. This was withdrawn as a part of the original application process and is not proposed to be reinstated. Despite its withdrawal, a number of proposed conditions in the existing 2018 consents appear to relate to the effects of a further take from the Rangitata River.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

MCWS is the landowner and developer of the project.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Intention is to commence Stage 1 as soon as possible once approvals are obtained and detailed design, project finance and other matters relevant to construction are complete. MCWS anticipates this will be 18 months from the initial obtaining of approvals.

Other stages will be progressed in the timeframes set out elsewhere in this application.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Ashburton District Council, Canterbury Regional Council, Te Rūnanga o Ngāi Tahu and Te Rūnanga o Arowhenua.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

RDRML undertook an extensive process of consultation to inform the original consents and discussions continued through the hearing and appeal process.

The parties that were consulted with and participated in that hearing process included, for example, the Department of Conservation, Central South Island Fish & Game, Royal Forest & Bird and Jet Boating New Zealand. Various other fishing and irrigation interests were also involved.

However, the original consented proposal initially included the take of further water from the Rangitata River and associated fish screening infrastructure. The water take application was ultimately withdrawn and it does not form part of the current proposal, and the fishscreen project has been completed separately. On this basis (and with no further water being taken from the Rangitata River), the applicants consider there is likely to be only limited interest in the current Klondyke Storage project.

To the extent relevant, the outcomes of previous consultation have still been carefully considered in relation to the current Klondyke Storage project.

MCWS has consulted further with the Canterbury Regional Council, Ashburton District Council and Te Rūnanga o Arowhenua making them aware of the current project and dialogue with these stakeholders will be ongoing.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

Not applicable.

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The Ngāi Tahu Claims Settlement Act is the relevant treaty settlement in this area.

Under the Act, the Rangitata River is listed as a Statutory Acknowledgement area in Schedule 55.

The Statutory Acknowledgement recognises Ngāi Tahu's cultural, spiritual, historic, and traditional association to the Rangitata River, as summarised below:

• major mahinga kai for Canterbury;
• knowledge of trails, places for gathering kai and other taonga and tikanga for the proper and sustainable utilization of resources;
• mauri as a critical element of the spiritual relationship of Ngaī Tahu Whānui with the river.

The purposes of the Statutory acknowledgement relevant to this application are:

• consent authorities forward summaries of resource consent applications to Te Rūnanga o Ngāi Tahu;
• consent authorities have regard to the Statutory Acknowledgement when making a notification decision on a resource consent, interests in Environment Court proceedings or a determination under the Heritage New Zealand Pouhere Taonga Act 2014.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:
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Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

Although there are differences in the proposal, effects were considered in significant detail as a part of the 2015-18 consenting process. The below has in part relied on those previous assessments (but it needs to be recognised that the now staged proposal without a take from the Rangitata River is likely to have materially lower adverse environmental effects).

Landscape, Visual and Natural Character:
The Klondyke Facility (when all three stages are constructed) would generate a low level of impact on local landscape values and sensitivities on less elevated parts of Peel Forest, Mount Peel Station, the rest of the Ashburton District Plan Outstanding Natural Landscape, with a moderate impact in some higher elevations. There could also be a low to moderate level of impact on landscape values east of the Rangitata River.

Mitigation planting will mitigate the effects on landscape.

Hydrology:
The potential for adverse effects on existing users, sediment transport and river morphology, river mouth behaviour and local drainage arising from the proposal will be less than minor. No additional water (i.e. over and above existing consented levels) is proposed to be taken.

Water Quantity and Quality:
The proposal will not result in unacceptable adverse effects on water quality and freshwater ecology. Ecological assessments (to the extent they are relevant to the staged proposal) have concluded that:

• The construction of the reservoir will not impinge upon any moderate or significant existing surface water features or aquatic biota; and

• Within the Klondyke facility itself, a model of inflows and irrigation flows indicates that the pond would be drawn down most summers reducing the risk of thermal stratification and de-oxygenation of the bottom layer of water. Residence time is also expected to be limited with frequent turnover of water occurring. This means that water discharged from the pond will be of an acceptable quality.

Terrestrial Ecology:
The Klondyke Facility is located on existing farm land with limited ecological values.
The proposal is highly unlikely to affect river birds. Mitigation associated with future stages may result in a net benefit to native vegetation and lizards by providing native vegetation interspersed with rocky lizard habitat.

Economic:
The economic effects that could arise as a consequence of the proposal were assessed in 2016. Overall, it was concluded that the provision of a consistent secure water supply provided by the proposal will result in direct economic benefits to the local, regional and national economies. Some of these effects will be, or have to potential to be, significantly positive.

It needs to recognised that this assessment is now dated (and therefore likely to be conservative) but also needs to be considered against the now staged proposal.

The 2016 assessment (focused on the full 53 million cubic metres of storage) concluded that:

• The potential value of increasing the reliability of supply to existing RDR irrigators was the order of $33.5 million at the farm-gate, in the average season. The total (direct, indirect and induced) impact on Canterbury Regional GDP was estimated to be $52.3 million per annum.

• At an individual farm scale, the average season cash flow surplus on the average dairy farm would increase in the order of 19 to 35% as a direct result of

being able to consistently irrigate the land. The flow on effects of this increased profitability results in economic benefits beyond the District and Regional context.

• The construction of the pond is likely to be over a 3 to 5 year period and at its peak, result in a significant onsite construction workforce.

Economic effects are also discussed in the eligibility section below.

Cultural
The previous applicant, RDRML worked with Te Rūnanga o Arowhenua to respond to them in a meaningful and comprehensive manner. It was concluded that it will be possible to advance the proposal in a manner that ensures any residual adverse cultural effects (following the adoption of the avoidance, remediation (restoration) and mitigation measures) are acceptable. There may also be opportunities identified by Te Rūnanga o Arowhenua for the proposal to result in positive cultural effects.

Discussions with Te Rūnanga o Arowhenua are ongoing

Historic Heritage
The proposal is unlikely to generate any adverse archaeological effects as the site is located in an area that does not contain any recorded archaeological sites, nor are there any historic heritage sites listed within the Ashburton District Plan relevant to the proposal.

The site also has no known archaeological value or significance.

An accidental discovery protocol is till proposed.

Civil Safety and Design
The Klondyke Storage Facility (and RDR canal modifications) are being carefully designed to comply with all dam safety requirements.

Social
The proposal will likely generate impacts that benefit the individuals, families and communities of interest. For example, the proposal is expected to enable further enterprise in Canterbury and contribute to the social infrastructure of mid and south Canterbury.

Other effects
There are a number of effects associated (mainly) with construction that can be managed through the imposition of what are relatively routine conditions for a project of this type. This includes traffic and parking, noise and air quality (dust).

Positive
Many of the positive effects and benefits have already been identified in the preceding summaries. To summarise:

• Improved access to water for existing ALIL and MHV shareholders (and potentially other irrigators in the future who may directly or indirectly benefit from water storage within the District). Access to more reliable water enables farmers to provide their product more consistently to the markets they serve, with the associated benefits for their businesses.

• Less reliance on groundwater as a water source within the District, supporting a decrease in Nitrate concentration.

• There is also an opportunity for some other positive ecological outcomes including more efficient water application resulting in reduced nitrogen leaching (at least up to a certain point).

• Significant benefits to the local, regional and national economies (outlined above).

Overall, when view collectively, the proposal will generate an array of significant positive effects to the environment.

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Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

Given the particulars of the land and the project, the following NPS are not relevant: the New Zealand Coastal Policy Statement, NPS for Electricity Transmission 2008, The National Policy Statement on Urban Development 2020, NPS for Greenhouse Gases from Industrial Process Heat 2023. The land

is not classified as highly productive land and therefore the project is consistent with the NPS for Highly Productive Land, to the extent that it is relevant.

National Policy Statement for Freshwater (NPSFM) 2020:
The NPSFM recognises the national significance of fresh water and sets the national policy framework for its use, management and protection. The NPSFM directs policy and standards to be implemented by Regional Council's, with regard to freshwater management. Further, it identifies national values that need to be achieved through subsequent planning documents.

Regional councils are required to give effect to the NPS-FM in developing freshwater policy. In a large part, this will be through the development of regional plans that address Freshwater Management Units (FMU). At the outset it is identified that it is not possible to fully implement the NPS-FM through a resource consent process before the completion of the required FMU process to implement the National Objectives Framework. This is because implementation of the NPSFM requires set processes to be followed to identify values, attributes, and outcomes, take limits, and freshwater flows and levels for Freshwater Management Units.

Having considered the provisions we note:
a. The proposal is seeking to store water in a manner that will provide for its more efficient and effective end use. The efficiencies are gained through the security of supply that is achieved by having the resource available for use when it is needed. As such, water from the Rangitata River is able to be managed to provide for greater consistency of flow, ensuring the management of water being abstracted, and as a result limiting the impacts for end users of water restrictions. The proposal will enable greater efficiency and use of water without increasing the volume of water that is abstracted from the river. As such, it is considered that the proposal will improve and maximise the efficient allocation and use of water.

b. Similarly, the design of the proposal has been undertaken to ensure that it does not result in a significant impact on the environment, or the cultural, social and economic values of the area. The construction methodology is such that discharges are controlled and managed to appropriate levels and interactions with the river environment are avoided. The works include extensive use of erosion and sediment control devices to ensure that the exposed areas are controlled and adverse off-site effects are minimised.

c. The existing RDR is identified as a significant piece of regional infrastructure. The proposal will add to the viability of it, including the ongoing operations of the renewable electricity generation, by providing the security of supply that is needed to ensure it is managed in an integrated manner. The storage enables the full utilisation of the existing infrastructure throughout the year, ensuring that the existing limitations due to restrictions in supply are able to be avoided.

Overall, it is considered that the Proposal is consistent with the NPSFM.

National Policy Statement for Indigenous Biodiversity 2023 (NPSIB):
The NPSIB came into force on 4 August 2023 and sets out a regime for the identification and protection of significant indigenous biodiversity and for managing the adverse effects of subdivision, use and development. The NPSIB must be given effect to "as soon as reasonably practicable".
There are some provisions that came into effect on commencement, although the NPS contemplates and provides for phased implementation in some respects, including the assessment and identification of significant natural areas (SNAs). Ashburton District Council is at a very early stage in identifying SNAs, and it is highly unlikely that the site itself contains any SNAs. The requirements of clauses 3.10 to 3.15 and 3.17 of the NPSIB only apply to SNAs. Clause 3.16 applies to indigenous biodiversity outside SNAs and requires that:

• any significant adverse effects of development on indigenous biodiversity be managed by applying the effects management hierarchy; and

• any other adverse effects be managed to give effect to the objectives and policies of the NPSIB.
It is anticipated that there are negligible effects on existing terrestrial values with the opportunity for positive ecological effects to arise.

In practice it is also anticipated that the government's proposed RMA Amendments will give effect to previously announced changes to suspend the direction to councils to identify new significant natural areas in accordance with the NPS-IB for a period of three years.

National Policy Statement for Renewable Electricity Generation (NPSREG) (2011):
The RDR Diversion Race also provides water for hydro-electricity generation. Hydro-electricity does not for a direct part of the project.

The NPSREG provides high-level direction to the importance of renewable electricity generation.The filling of the pond is a temporary activity and is able to be managed so that minimal disruptions to the generation activities occur. Manawa, the operator of the stations on the network, is a shareholder in the RDR and has been consulted with regard to the wider storage proposal. It has not raised any concerns regarding the construction or ongoing operations of the pond.

Once operational, the Pond will provide for the increased security of supply for the hydrogeneration activities by ensuring that a consistent water supply is available. The added capacity that is created by the storage of water provides flexibility in the operation of the two hydroelectric power stations that are located on the RDR. As such, it effectively increases the generation capacity of the existing infrastructure, directly giving effect to the NPSREG without increasing the amount of water that is abstracted from the river.

Overall, it is considered that the Proposal is consistent with the NPSREG.

National Environmental Standards for Freshwater (NESF):
The NES-F introduces regulations for a number of activities related to freshwater. The NESF has been considered to determine whether there are any

relevant matters in the regulations that would apply to activities associated with the proposed water storage. The NESF is not considered to apply as there are no natural wetlands that will be affected by the storage ponds, and no works proposed that would affect the passage of fish, with the fish screen originally proposed by RDRML having already been constructed.

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Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

MCWS has determined that certain aspects of the consented pond are not financially viable and additional staging of both the pond construction and mitigation is required in order for the project to go ahead.

The previous consenting process took over three years and included a large number of interested parties, with further permissions still required. The fast-track process will enable MCWS to obtain new permissions to enable the project to proceed in a financially viable and time-effective manner.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

Referring this project, which is well-informed by past reports for the previously gained consents, will enable a streamlined process for a project that is well-aligned with the intent of the fast-track objectives, community objectives and regional objectives of the Canterbury Water Management Strategy (CWMS).

Has the project been identified as a priority project in a:

Local government plan or strategy

Please explain your answer here:

The Proposal sits within the CWMS as a key component to unlocking the potential economic, social, and environmental benefits of optimising water use in the Canterbury Region.

Will the project deliver regionally or nationally significant infrastructure?

Regional significant infrastructure

Please explain your answer here:

This project will deliver regionally significant infrastructure with significant economic, social, and environmental benefits of optimising water use in the Canterbury Region.

Will the project:

Please explain your answer here:

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

Irrigation is of significant value and importance to the Canterbury economy, given the relatively low rainfall, high temperatures, strong winds and, consequently, the region experiencing the highest potential evaporation deficit in the country. The RDR is the backbone for distributed irrigation in mid-Canterbury, playing a significant role in providing for the social and economic well being of the Canterbury community. The potential value of increasing the reliability of supply to existing RDR irrigators through water storage has been assessed in 2016 as being in the order of $33.5 million at the farm-gate, in the average season. The total (direct, indirect and induced) impact on Canterbury Regional GDP was estimated to be $52.3 million per annum.

Prior economic analysis indicates that, if irrigation was restricted by 50% or more, the reduction in daily production is approximately 85% of average daily production. Restrictions of 0 to 50% result in pasture production losses of approximately 25%. Irrigation and storage of water is vitally important to the district and region.

The RDR supplies two community irrigation schemes (MHV and ALIL) and through a water swap arrangement also supplies a further irrigation scheme (the Barrhill-Chertsey Irrigation Scheme). The community irrigation schemes have the necessary resource consents to irrigate over well 100,000 hectares of land (with an existing irrigation area of approximately 116,000 hectares). This makes the combined schemes the largest irrigation area in New Zealand.

Further, two hydroelectric power generation stations and the Ashburton District Council stock water network are also supplied by the RDR.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

Water storage leading to increase irrigation reliability allows for a greater degree of certainty for agricultural uses and as a result provides consistency in managing activities and incomes. The impacts of water restrictions and inconsistencies in water supply result in negative effects on the economic viability of agricultural operations.

The applicant sees the Klondyke storage as a critical part of mitigating the effects of climate change (that is likely to result in increased water demand). The proposal is also in line with the Canterbury Water Management Strategy that contemplates storage and reliability in the area.

At an individual farm scale, the estimated economic impact resulting from certainty of water supply for irrigation on the profitability of the individual farm from water storage, based on the Ministry of Primary Industries farm monitoring data, suggested the average season cash flow surplus on the average dairy farm would increase in the order of 19 to 35% as a direct result of being able to consistently irrigate the land. The flow on effects of this increased profitability results in economic benefits beyond the District and Regional context.

Will the project support development of natural resources, including minerals and petroleum?

Yes

Please explain your answer here:

The project will enable the continued operation of irrigation in the Ashburton District.

Although the proposal is not to directly increase water availability for new irrigation areas, it is possible that the Klondyke Facility may for example support conversion from sensitive groundwater takes to surface water.

The original 2015-18 consenting process contemplated a relatively small area of new irrigation (1900 hectares) which was assessed (in 2016) as resulting in an additional direct contribution to regional GDP of $43.3 million and total impact $64 million. Again, expanded irrigation areas are not part of the current proposal but the above assessment does further demonstrate the value of continuing to enable existing irrigaton.

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

The proposal will be aid in mid-Canterbury's response to the effects of climate change. The storage of water will allow for efficiencies to be gained in its distribution and use. In addition, as the existing canal network is integrated with two hydroelectric power stations, the proposal will result in efficiencies with their ongoing operation and provide for security of supply into the future

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The proposed water storage will improve the efficient use of water by storing water for irrigation when demand is increased, including during periods of dry climatic conditions or when water levels are low in the Rangitata River.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

The proposal will facilitate other opportunities, with water available as a physical tool to assist in achieving the water targets and outcomes.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The Canterbury Regional Council, in association with the City and District Council's of the region, Ngai Tahu and key stakeholders, have developed the Canterbury Water Management Strategy (CWMS). The CWMS sets the direction targets for sustainable water management in Canterbury, based on community led decision-making. The strategy document, published in 2009, sets out both a shared vision and a collaborative process for gaining the greatest benefits from water, while at the same time protecting and restoring the environment.

The Strategy identifies 10 key target areas, being:
• Ecosystem health/biodiversity;
• Braided rivers – natural character, processes and ecological health;
• Kaitiakitanga;
• Drinking water;
• Recreational and amenity opportunities;
• Water use efficiency;
• Irrigated land area;
• Energy security and efficiency;
• Indicators of regional and national economies; and
• Environmental limits.

Within the target areas, the CWMS identifies methods and timeframes to achieve the objectives.

The proposal will provide support for the CWMS in a number of ways. This includes environmental benefits from the creation of the habitat, as well as the availability of water for future potential environmental mitigation. The storage of water will allow for efficiencies to be gained in its distribution and use, to ensure that the environmental and economic benefits are realised. In addition to this and as identified in the assessment of the NPSREG, as the existing canal network is integrated with two hydroelectric power stations, the Proposal will result in efficiencies with their ongoing operation and provide for security of supply into the future.

Particular regard has been given to the natural character of the area, the ecological health of the Rangitata River and the principle of kaitiakitanga. The proposal will ensure that these key areas are supported and as a result assist in achieving the targets identified in the CWMS.

Anything else?

Please write your answer here:

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

Yes

If yes, please explain:

Water storage is an important means by which the Scheme will mitigate the future effects of climate change (which is predicted to result in increased irrigation demand).

No natural hazards are known that will materially impact on the project (with the storage being designed in accordance with all relevant dam safety guidelines).

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

There has been no compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill.

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:
Rebecca Whillans

Important notes