

**BEFORE THE INDEPENDENT HEARING COMISSIONERS ON BEHALF
OF THE NORTHLAND REGIONAL COUNCIL (NRC)**

IN THE MATTER

of the Resource Management Act 1991 (RMA)

AND

IN THE MATTER

of applications by members of the Motutangi-
Waiharara Water Users Group for new
groundwater takes from the aupouri aquifer
subzones: houhora, motutangi and waihara

**BRIEF OF EVIDENCE OF MARTELL LETICA
12 MARCH 2018**

1. INTRODUCTION

- 1.1. My full name is Martell Letica.
- 1.2. In this matter, I have been engaged by the Motutangi-Waiharara Water Users Group (MWWUG) to prepare and present planning evidence.

2. REASONS FOR APPLICATIONS FOR RESOURCE CONSENT

- 2.1. Section 14(2) of the RMA restricts the taking and use of water (other than coastal water), unless allowed under Section 14(3) of the RMA.
- 2.2. 'Water' is defined in s2 of the RMA as '*(a) means water in all its physical forms whether flowing or not and whether over or under the ground:...*'
- 2.3. Pursuant to s14(3) RMA, it is not prohibited to take and use groundwater where it is expressly allowed by a national environmental standard, a rule in a regional plan as well as a rule in a proposed regional plan for the same region (if there is one), or a resource consent. It is also not prohibited to take and use fresh water for an individual's reasonable domestic needs or the reasonable needs of a person's animals for drinking water, and the taking or use does not, or is not likely to, have an adverse effect on the environment.
- 2.4. The operative regional plan is the Regional Water and Soil Plan for Northland August 2004 (RWSP). The RWSP contains permitted activity rules for taking and using groundwater. However, the takes are not for domestic or stock watering use (Rule 25(A)) and exceed the daily volume of 10 m³/day and instantaneous rate of 5 L/s per bore (Rule 25.01.01).
- 2.5. Discretionary Activity Rule 25.03.01 of the RWSP states that the taking, use or diversion of groundwater from an aquifer, and any associated discharge of groundwater onto or into land or into water, which does not meet the requirements of the permitted, controlled or non-complying activity rules is a discretionary activity.
- 2.6. In this regard, resource consent for a Discretionary Activity consent is sought for all 17 applications under the RWSP.
- 2.7. NRC notified the Proposed Regional Plan for Northland in September 2017 (PRP). The PRP has immediate legal effect from notification. The initial submission period has closed with submissions summarised and publicly notification of the decisions requested by submitters made as well. Opportunity to make further submissions is now open until 26th March 2018.
- 2.8. Rule C.5.1.10 of the PRP states that the taking and use of freshwater that is not a permitted, controlled, non-complying or prohibited activity is a discretionary activity. The proposed applications to take and use exceed permitted activity thresholds.
- 2.9. Under the PRP, it is a non-complying activity to take and use freshwater which does not exceed a default allocation limit for an aquifer by more than five percent of the annual average recharge. A take which causes the default allocation to be exceeded by more than five percent of the annual average recharge is a prohibited activity.

- 2.10. Technical evidence demonstrates that these 17 proposals are Discretionary Activities under Rule C.5.10 of the PRP as no allocation limit for an aquifer will be exceeded. NRC have reached the same conclusion in their s42A report.
- 2.11. The 17 applicants require resource consent to take and use groundwater because they are not allowable activities under s 14(3) of the RMA.

3. APPLICATIONS & AMENDMENTS

- 3.1. I was not responsible for the preparation of the Applications nor the Assessment of Environmental Effects (AEE) prepared by Williamson Water Advisory Ltd (WWA) that forms part of the applications for resource consent submitted to the NRC.
- 3.2. In this matter, I present confirmed details of the applications as attached in Annexure 1 (Track-Changed 'Recommendations').
- 3.3. Application details which have been amended (track-changed) in this document ('Recommendations') since Northland Regional Council (NRC) issued their Section 42A report are;
- Names of applicants;
 - Weekly and annual volumes of proposed abstractions;
 - Area (size) over which water is sought to be used; and
 - Legal descriptions of land where water is sought to be used.

4. RELEVANT PLANNING DOCUMENTS

- 4.1. I agree with NRC's assessment of relevant planning documents in paragraph 64 of the s42A report.

5. EXISTING ENVIRONMENT

- 5.1. Existing environment at a technical level has been described by many parties already, including Williamson Water Advisory Ltd (WWA), Land, Water, People (LWP) and most recently NRC's s42A report.
- 5.2. I comment on the following matters which are fact when considering existing environment within the planning framework;

GROUNDWATER RESOURCE

- 5.3. Under the RWSP, the resource is not identified in any Schedules for the taking and use of groundwater. The Aupouri Aquifer is identified in Schedule F as an aquifer sensitive to bore construction however.

5.4. Under the PRP, the resource is identified as the Aupouri aquifer management unit. Sub-aquifer units have been identified within this aquifer management unit. The sub-aquifer relevant to these 17 applications are the Houhora, Motutangi and Waiharara sub-aquifer units.

SURFACE WATER RESOURCES

5.5. Mr Williamson describes surface water resources in his statement of evidence and I see no need to duplicate this here.

CURRENT CONSENTED ALLOCATION

5.6. The available allocation in accordance with Policy D.4.17 of the Proposed Regional Plan for Northland 2017 (PRP) as at the date these 17 applications were formally received under Section 88 of the RMA is presented in Table 1;

Table 1: Assessment of consented allocation (Source: WWA Expert Evidence).

Table Sub-aquifer	Allocation Limit		Current Allocation Status ¹		MWWUG Proposal
	m ³ /year	% ann. average recharge	m ³ /year	%	m ³ /year
Aupouri-Houhora	2,141,300	11	1,045,494	49	374,983
Aupouri-Motutangi	1,069,600	10	374,497	35	666,067
Aupouri-Waiparera	2,312,200	10	288,445	12	1,405,300
TOTAL	5,523,100		1,708,435		2,446,350

1. According to NRC's allocation maps at <http://gis.nrc.govt.nz/LocalMaps-Viewer/?map=895e0785f7054d47b10a72edc38022dc>

ACTUAL WATER USE

5.7. Neither myself nor our technical expert, Mr Williamson, has undertaken an assessment of the actual use of consented allocation within the sub-aquifer units. Mr Williamson simulated actual water use within the predictive modelling exercise. NRC has carried out an assessment of selected water use records for the purposes of rationalising application water volumes.

LAND USE

5.8. Land to the west of the applications is described as being dominated by exotic plantation forestry with pockets of low-producing grassland, gorse and broom, and dune lakes. Central and eastern areas are described as high-producing exotic grassland interspersed with indigenous kanuka/manuka shrubland. There are pockets of land described as orchard, vineyard or other perennial crop.¹

¹ Land Care Research land cover database, version 4.1.

6. LIMITED NOTIFICATION

- 6.1. I am in agreement with the summary of s 95A-95G RMA assessment provided by NRC in their s42A report regarding the decision to limited notify these applications. In particular the absence of any duty for applications to consult with affected persons within the RMA.
- 6.2. However, what went un-noted in the NRC's s42A report is that nine applicants sought out and received written approval from persons whom were identified as potentially affected by NRC. Furthermore, the eight applicants who did not obtain written approvals were alternatively instructed that their applications required further information before a decision on affected persons could be made.

7. SUBMISSIONS

- 7.1. A total of 57 submissions were received, 42 in opposition, 7 neutral and 8 in support of the applications.

SUBMITTER ISSUES

- 7.2. I have reviewed submissions and have come to the conclusion that they can be arranged by theme and that some issues can be considered within the scope for applications for discretionary activities to take and use groundwater while other issues cannot.
- 7.3. My brief of evidence concentrates on those matters which require planning expertise and includes the application of relevant case authority, plan integrity and precedent. This brief also discusses points which are in contention that we have subsequently addressed through changes to the NRC's 'Recommendations' in Annexure 1.
- 7.4. Although some of my evidence is of a legal nature, my evidence does not constitute a legal opinion, I merely reference case authority where it exists on a certain matter;

Procedural Matters

- Consultation by applicants – there is no statutory duty to consult (Clause 6(1)(f) Schedule 4 RMA, and s36A(1)(a) RMA); the applicants aren't resource management practitioners, they immediately acted upon NRC instructions regarding written approvals and affected parties when asked to obtain these.
 - Regional Council consultation practices and process – NRC has not commented on this issue in contention for submitters within their s42A report. My evidence does address this and concludes that there are no statutory obligations requiring that a consenting authority consults with affected parties with regard to applications for resource consent.
 - Decision to limited notify – I am in agreement with the NRC's summary details of their methodology and decision-making criteria regarding the decision to limited notify these applications.
- 7.5. In concluding, there is no basis for the panel to re-visit procedural matters and that submissions seeking to refuse consent on these matters should be disregarded.

Effects Assessment

- Sustainability of allocation framework – The total volume of the proposed allocation combined with the current allocation does not exceed any of the allocation volumes for the relevant sub-aquifer units specified in the PRP. The PRP is still in the submission process, although the scope has now narrowed as to who can make further submission. I conclude that the weight which the PRP allocation limits are given must be considered against the technical evidence presented. Between NRC's s42A report and Mr Williamson's evidence, I find no basis that the activities require further scrutiny as to their potential sustainability within the proposed allocation framework.
- Cross-boundary effects – I am in agreement and rely on Mr Williamson's evidence regarding assessment of the scale and nature of the effect on this matter. This is a purely technical issue seeing as the consents held by the submitter (Mr Susich) have not lapsed but rather have just not reached full production capacity. Mr Williamson concludes that exercise of consent by applicants in conjunction with full abstraction would not exacerbate effects from manifesting in the Sweetwater zone.
- Efficient use of the water (volumes) – I am in agreement and rely on Mr Williamson's evidence regarding assessment of the scale and nature of the effect on this matter. We have confirmed final volumes in Annexure 1 which we conclude as being an efficient and sustainable use of the groundwater resource.
- Saline intrusion – I am in agreement and rely on Mr Williamson's evidence regarding assessment of the scale and nature of effect on this matter. We support the Recommendations of NRC as relate to saline intrusion monitoring and response to potential adverse effects. However, the applicants do have concerns regarding the establishment and ongoing operational logistics that would be necessary to carry-out such a monitoring programme. There is mutual benefit gained through monitoring between the MWWUG and NRC and therefore a mutual stewardship responsibility. I elaborate more on this in Section 8.4.
- Groundwater level drawdowns (interference effects) – I do not elaborate further on this point as Mr Williamson has provided sufficient technical and planning evidence on this point. However, I have made suggested changes to the 'Recommendations' and included reasoning in this document (Annexure 1).
- Water quality effects (discharges and surface waterbody/wetland levels) – see Mr Williamson's evidence. Regarding discharges associated with horticultural landuse, I conclude these are outside of the scope of the matter being heard. However, I discuss the option of educating consent holders of regulatory responsibilities through an Advice Note in the 'Recommendations' attached in Annexure 1.
- Ecology – I am in agreement with NRC's Consultants that effects on ecological values will be less than minor under their current recommendations. While I propose to present alternative monitoring conditions, these alternatives do not seek to minimise the information required to address remaining residual uncertainty.

- Cultural – The NRC determined that there may potentially be adverse cultural effects from these applications on Maori and their relationship, culture and traditions with the area. Five Iwi Authorities and four Marae were deemed affected and served notice of these applications. The subsequent transactions with these entities is documented in paragraphs 34-36 and 130-136 of the s42A report. There has been some disagreement about the adequacy of this consultation noted in paragraphs 37 and 137 of the s42A report. In such cases, it is appropriate to put the issue of consultation aside and to deal with the evidence at hand (*Genesis Power Limited v Manawatu-Wanganui Regional Council* [2006] NZRMA 536 HC and [2009] NZRMA 312 CA). Regarding cultural effects relating to water quantity and quality, jurisprudence has established that there must first be biophysical adverse effects, established on evidence, before metaphysical effects might be taken into account under s6(e) of the RMA. The technical analysis conducted by both Mr Williamson and Mr Hughes disproves the likelihood of adverse effects on cultural aspects of the affected environment to the degree that resource consents should be refused. Where uncertainty has been identified in technical analysis, monitoring is supported by the applicants provided it is fair and reasonable in the context of the overall sustainable management of the resource. In this respect, there is a duty for NRC to gather information and undertake or commission such research as is necessary to carry out its functions under the RMA or regulations under the RMA s35 of the RMA. NRC has considered that the principles of whanaungatanga and kaitiakitanga may be encouraged through the recommended conditions 20 and 21 to establish a Water User Liaison Group. I seek changes to proposed Conditions 20 and 21 of NRC's 'Recommendations' and I give reasoning in Annexure 1 and Paragraph 10.5.
- Inadequacy of assessment and monitoring – technically, the assessment and proposed monitoring programme was comprehensive and was accepted by NRC as being adequate to continue to consider the applications under s104 of the RMA.
- Socio-economic effects – I do not dispute the findings in Section 4.9 (paragraphs 126-128) of the s42A report.
- Competing demand for water/appropriate use for water – Firstly, the nature of the environment has been addressed, as was its future component as recognised in case authority. Mr Williamson and NRC have come to similar conclusion that the activities do not cause an existing or proposed allocation limit framework to be exceeded. As such, these applications do not cause others to be restricted from seeking resource consent to take water noting that they should equally be subject to the same high-level of information provision as the MWWUG was should they make such application (i.e., that significant assessment of environment effects is carried out). As to the distribution of allocation, NRC has rightly described *Central Plains Water Trust v Synlait Ltd* [2010] NZRMA 237 (CA) as the case authority that establishes the procedure for consenting authorities receiving applications for a common resource. This is oft referred to as the 'first in first served' criteria. However, the Council is charged with a duty to monitor the exercise of resource consents that have effect in its region (s35(2)(d) of the RMA) and to take appropriate action having regard to the methods available to it under the RMA where it is shown that action is necessary (s35(2) RMA). In this case, if action is required to review the allocation of the resource, this is made possible within Condition 23(b) contained in NRC's Recommendations.

- Effects of climate change – the proposed allocation limits in the PRP have allowed for the effects of climate change. Mr Williamson provides further technical expert advice regarding the conservatism that exists within the proposed allocation framework as was notified.

7.6. Decline of consent as sought by submitters whom raised concerns around these matters must be disregarded as there is adequate information to determine grant of these applications.

Outside of Scope

7.7. An issue specifically raised by seven submitters (S Simpkin, H Exley, D.E Woodcock, Te Runanga Nui o Te Aupouri Trust, R.L Dension, J Wright and G.J Stanisich) that I consider to be outside of the scope of applications for a discretionary activity to take and use groundwater was in relation to the use of agrichemicals. The Regional Air Quality Plan for Northland (RAQPN), RWSP and PRPN currently regulate discharges to air, land and water in relation to agricultural practices including the use of agrichemicals. I consider that the abovementioned planning instruments contain policies, rules and standards for the use of agrichemicals which achieve the sustainable management of these resources, which includes people and the communities. However, I have amended the 'Recommendations' to include an Advice Note which informs consent holders about their overall responsibilities should other approvals be required.

8. MEASURES SEEKING TO REMEDY AND/OR MITIGATE

PRECAUTIONARY PRINCIPLE AND ADAPTIVE MANAGEMENT

8.1. There are no policies in either the RWSP or PRP which require the adoption of a precautionary approach towards the activity of taking and using groundwater. However, Policy D.2.8 of the PRP states that where there is scientific uncertainty about the adverse effects of activities on significant ecological areas (i.e., the Kaimaumu Wetland) the greatest extent of an adverse effect reasonably predicted by science must be given the most weight. Mr Williamson has explained the science behind the actual or potential effect on the Kaimaumu wetland and has provided assessment conclusion under the most conservative of model scenarios (Scenario 2 – leaky aquifer). Furthermore, Mr Williamson conducts similar precautionary assessment across the potentially affected environment in the absence of a policy direction in either regional plans.

8.2. Section 104(6) RMA gives the panel the power that they may decline on the basis of inadequate information. However, it is widely accepted that the consent authority may grant consent even if it lacks sufficient information to do so particularly if adaptive management is proposed to respond to uncertainties (i.e. the *Sustain Our Sounds v New Zealand King Salmon Company Ltd* criteria are met).

MONITORING (APPLYING ADAPTIVE MANAGEMENT)

8.3. I agree with the NRC's conclusions in Section 6.2 of their s42A report which identifies a number of monitoring conditions that seek to address residual scientific uncertainty around a number of matters, including the effect on the Kaimaumu wetland.

8.4. However, I find that if all the cost and management of the monitoring programme is to be borne by the applicants, that this would not be fair and reasonable as such monitoring will provide for the benefit of others as well as the applicants. Instead, I propose alternative considerations for the Panel, including;

- A monitoring programme that seeks to distribute responsibility to the MWWUG where monitoring is directly related to the exercise of the consents and cannot be used by others while other monitoring that can be utilised by others is to be carried out by NRC within the gambit of their functions under the RMA (i.e., s35 RMA); or
- A condition requiring financial contribution to be made by consent holders commensurate to the scale of their activities and which recognises an equitable distribution with SoE monitoring. This is supported by Objective 38.2.2 and Policy 38.2.3(2) of the RWSP and Administrative Matter G.3 of the PRP; or
- An offered condition of financial contribution that NRC may not otherwise be able to impose. Contribution is to be made by consent holders commensurate to the scale of their activities and which recognises an equitable distribution with SoE monitoring.

8.5. The alternative to this is that the monitoring and reporting conducted by MWWUG remains the intellectual property of the MWWUG where NRC may be invited to view information but does not hold the information. Unfortunately, s6 and s7 of the Local Government Official Information and Meetings Act 1987 are not robust enough protections for information of a highly commercial nature to be withheld should a challenge be made under this Act.

9. STATUTORY CONSIDERATIONS

9.1. The provisions of the National Policy Statement for Freshwater Management 2014 (amended 2017), Regional Policy Statement for Northland 2016 (operative except GE provisions), RWSP and Far North District Plan have to be given full weight, as they are operative documents. Some weight can be afforded to the provisions of the PRP, but this is tempered by the fact that the entire document is subject to significant challenge through submissions.

9.2. I am in agreement with the NRC's approach to establishing relationships between relevant objectives and policies of statutory documentation within their overall assessment. However, I don't believe this approach is a wide enough application to enable an overall judgement to be made.

9.3. My evidence will present a full set of relevant provisions of the statutory documentation that must be had regard to. My conclusion after assessment is that the applications are not contrary to the relevant provisions of those statutory documents highlighted in paragraph 64 of NRC's s42A report.

10. PART 2 OF THE RMA

10.1. This brief identifies my opinion on the overall circumstance regarding Part 2 of the RMA. My evidence is much more robust and attends to all matters specifically.

- 10.2. The proposed activities are consistent with the purpose of the RMA, as outlined in Section 5. The proposals will not affect the ability for the community and its people to provide for their social, economic and cultural well-being and for their health and safety. The reasonably foreseeable needs of future generations, or on the life-supporting capacity of water at this location or any ecosystems associated with it will be avoided, remedied or mitigated.
- 10.3. Matters of national importance under s6 of the RMA are clearly recognised in the relevant planning documents as the dune lakes and wetlands. Scientific assessment demonstrates that there is unlikely to be an adverse effect on these dune lakes and wetlands, therefore natural character will be preserved and significant indigenous vegetation and habitats of indigenous fauna will be protected (s6(a) and s6(c) RMA).
- 10.4. The activity is consistent with the relevant provisions of s7 of the RMA. In making this conclusion in my larger body of evidence, I give particular regard to kaitiakitanga, the ethic of stewardship, the efficient use and development of natural and physical resources, the maintenance and enhancement of amenity of values, the intrinsic values of ecosystems, maintenance and enhancement of the quality of the environment, any finite characteristics of the natural and physical resources, and the effects of climate change.
- 10.5. With regard to the requirement to take into account the principles of Te Tiriti o Waitangi, I address the three articles in my core evidence however only note the core principles emphasised through the Courts in this brief. The principle of active protection has been taken into account by WWA in the original AEE and this is agreed by NRC in paragraph 188 of the s42A report. I do find that I am at odds with NRC's conclusion that the core principle of partnership will be encouraged through a water liaison group however. This principle of partnership can only be delivered at the authority level, not at a consent holder level.

11. RECOMMENDATIONS

- 11.1. Annexure 1 is a track-changed version of the NRC's Recommendations. It contains both administrative and technical changes. I have added reasoning under each change of a technical nature but have omitted this from this brief for administrative changes. However, I do elaborate on all changes in my full set of evidence.

12. CONCLUSIONS

- 12.1. There is a general consensus on effects and corresponding conditions between the representatives of the MWWUG, being Mr Williamson and myself, and the NRC's Consultant experts.
- 12.2. I also see general consensus is achieved between myself and NRC's Consultant Planner that the proposals achieve the purpose of the RMA and would not be contrary to relevant statutory provisions.
- 12.3. Where we have not achieved consensus is the implementation of the monitoring plan and I have supplied brief of evidence in this regard in the Sections above.

Annexure 1

<u>Consent</u>	<u>Holder</u>	<u>Annual Limit</u>	<u>Weekly volume of taking</u>
-	-	(m ³) being 1 July to 30 June:	(m ³ /week)
-	-	-	being any 7 consecutive days:
APP.038328.01.01	Bernard Kim & Sheryl Dianne Shine	50,184	1,879
APP.039332.01.01	LJ King Limited	80,000	3,758
APP.038471.01.01	Honeytree Farms Limited	372,000	24,500
APP.038589.01.01	Neil & Alma Violet Thompson and Steven & Josephine Suzanne Thompson	39,350	2,240
APP.039345.01.01	Ongare23 Trust	24,000	1,400
APP.038610.01.01	Mapua Avocados Ltd	745,000	35,000
APP.038591.01.01	Cypress Hills Ltd	41,720	1,960
APP.038650.01.01	Tony and Diane Hewitt	40,230	1,890
APP.027391.01.02	Ivan Anthony Stanisich	64,070	3,010
APP.038454.01.01	Elbury Holdings Limited	113,700	5,342
APP.038380.01.01	Daimen & Katherine Holloway	14,900	700
APP.039381.01.01	Johno and Carol Brien (Lamb Road)	14,900	700
APP.039244.01.01	Kevin and Dani Thomas	59,600	2,800
APP.038420.01.01	Largus Orchard Ltd Partnership	193,700	9,100
APP.038513.01.01	Te Rūnanga o Ngai Takoto	193,700	9,100
APP.038410.01.01	Georgina Tui and Mate Nickolas Covich	223,500	10,500
APP.038732.01.01	Kathy Valadares	48,000	1,050

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Notification of Irrigation

- 2 The Consent Holder shall advise the council's assigned Monitoring Officer in writing when irrigation is to commence for the first time each season, at least five days beforehand.

Metering and Abstraction Reporting

- 3 Excluding a take below 5 litres per second, the Consent Holder shall install a meter to measure the volume of water taken, in cubic metres, from each production bore. Each meter shall:
- Be able to provide data in a form suitable for electronic storage;
 - Be sealed and as tamper-proof as practicable;
 - Be installed at the location from which the water is taken; and
 - Have an accuracy of +/-5%.

The Consent Holder shall, at all times, provide safe and easy access to each meter installed for the purposes of undertaking visual inspections and water take measurements.

Reason for insertion:
Paragraph 65 of the s42A report only provides comment that takes be monitored in accordance with the Regulations. A requirement to install meters for takes equal to or greater than 5 litres per second would be consistent with this recommendation. That is unless the NRC has initiated Regulation 12(2). Suggest NRC clarifies this.

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4 The Consent Holder shall verify that the meter required by Condition 3 is accurate. This verification shall be undertaken prior to 30 June:

- (a) following the first taking of water from each production bore; and
- (b) at least once in every five years thereafter.

Each verification shall be undertaken by a person, who in the opinion of the council's Compliance Manager, is suitably qualified. Written verification of the accuracy shall be provided to the council's Assigned Monitoring Officer by 31 July following the date of each verification.

5 The Consent Holder shall, using the meter required by Condition 3, keep a record of the daily volume of water taken from each production bore in cubic metres, including all nil abstractions.

Reason for deletion:
See Mr Williamson's evidence.

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~~6 If the instantaneous rate of taking is equal to or greater than 10 litres per second, then the water meter required by Condition 3 shall be telemetered so that council can freely access the information at any point in time. The telemetry connection shall be agreed to by the council's Hydrology Manager.~~

Commented [ML1]: (see Mr Williamson's evidence on this matter).

~~76~~ The Consent Holder shall measure, and keep a record of, the static water level in each production bore at least once each month. This measurement shall be taken at least 12 hours after cessation of pumping.

~~87~~ A copy of the records required to be kept by Conditions 5 and 7 for the period 1 July to 30 June (inclusive) shall be forwarded each year to the council's assigned Monitoring Officer by the following 31 July. In addition, a copy of these records shall be forwarded immediately to the council's assigned Monitoring Officer on written request. The records shall be in an electronic format that has been agreed to by the council.

Advice Note: *If no water is taken during the period 1 July to 30 June (inclusive) then the Consent Holder is still required to notify the council's Monitoring Manager in writing of the nil abstraction. Water use record sheets in an electronic format are available from the council's website at www.nrc.govt.nz/wur.*

~~98~~ Easy access for a water level probe shall be provided and maintained at the production bore well head to enable the measurement of static water levels in the bore.

Water Use Efficiency

~~409~~ The Consent Holder shall prepare an Irrigation Scheduling Plan (ISP) which outlines how irrigation decisions will be made. The ISP shall be prepared by a suitably qualified and experienced person and submitted to the council's Compliance Manager for written approval. The ISP shall, as a minimum, address:

- water balance and crop water requirements;
- subsurface drainage; and
- overall irrigation strategy.

For each irrigation area, the ISP should include:

- (a) a description of how water requirement for each irrigation cycle is calculated;
- (b) method(s) for assessing current soil moisture levels;
- (c) method(s) for assessing potential evapotranspiration (PET) and rainfall to date;
- (d) assessment of other inputs such as effluent irrigation and effect on irrigation requirement;
- (e) soil moisture target to be maintained in each zone by irrigation;
- (f) how measured data will be used to assess irrigation requirements over the next irrigation cycle; and
- (g) a description of proposed method(s) for remaining within consent limits at each borehole or group of boreholes.

Advice Note: *The ISP seeks to ensure that an irrigation efficiency of a minimum 80% is achieved.*

~~410~~ The Consent Holder shall not exercise this consent until approval for the ISP required to be prepared in accordance with Condition 10 has been approved by the council's Compliance Manager.

~~4211~~ The ISP approved in accordance with Condition 11 shall be implemented prior to the first irrigation season, unless a later date has been approved in writing by the council's Compliance Manager.

~~4312~~ The Consent Holder shall, within six months of the first exercise of this consent, undertake an audit of the irrigation system using a suitably qualified and experienced person. The irrigation system audit shall be prepared in accordance with Irrigation New Zealand's "Irrigation Evaluation Code of Practice" (dated 12 April 2010), including recommendations on any improvements that should be made to the system to increase water efficiencies. The results of the audit and its recommendations shall be submitted in writing to the council's assigned Monitoring Officer within one month of the audit being undertaken.

~~4413~~ The Consent Holder shall, within three months of notification in writing by the council's Compliance Manager, implement any recommendations of the audit referred to in Condition 13.

~~4514~~ The reticulation system and components shall be maintained in good working order to minimise leakage and wastage of water.

~~4615~~ There shall be no significant ponding of irrigated water within any irrigated area, or significant runoff from either surface or subsurface drainage to a water body, as a result of the exercise of these consents.

Monitoring and Contingency Measures

~~4716~~ Prior to first exercise of this Consent, the Consent Holder shall submit a Groundwater Monitoring and Contingency Plan (GMCP) to the Northland Regional Council. The GCMP shall be prepared by a suitably qualified and experienced person and submitted to the council's Compliance Manager for ~~written approval review~~. The GCMP shall be generally in accordance with Schedule 1 of this consent and address the following matters:

- The location and physical details of individual monitoring sites.
- Specific details of monitoring to be undertaken at each site including the parameters to be measured and the frequency (and/or duration) of monitoring.
- Methods/procedures/standards to be adopted for the collection, management, archiving and reporting of monitoring results.
- Details of any arrangements in place for the collection, analysis and reporting of monitoring results by third parties.
- The form, content and frequency at which monitoring results will be reported to the council.
- Specific triggers for groundwater level and/or groundwater quality at each individual monitoring site. Multiple triggers may be specified for individual sites, each linked to a specific set of mitigation actions.
- Requirements for the reporting of trigger level exceedances to the council.
- Specific details of mitigation to be initiated in the event of a trigger level exceedance including:
 - Review/evaluation of monitoring data (particularly with respect to the magnitude of anticipated environmental effects).
 - Increases in the frequency and location of monitoring.
 - Changes to parameters being monitored.
 - Further hydrogeological, hydrological or water quality investigations to identify the potential causes of the trigger level exceedance.
 - Specific reductions in the rate/volume of groundwater abstraction.
- Development of strategies to avoid future trigger level exceedances.
- A process for reviewing and summarising monitoring results to support the staged development approach.
- A timeline and procedure for periodic review and updating of the GCMP to account for future water use, variations to prevailing environmental conditions and changes in access to monitoring sites.

Advice Note: *It is anticipated that a single GCMP will be prepared and submitted on behalf of all consent holders within the Motutangi-Waiharara Water Users Group.*

~~4817~~ The exercise of this consent shall not ~~prevent any other person who has consent to take groundwater, which was issued prior to 26 October 2017, from fully exercising~~

~~that consent lower the groundwater table below existing efficient bore takes whether a consented or permitted activity.~~

Reason for insertion:

~~Proposed condition does not distinguish in accordance with Policy 10.5.1(b) RWSP. Paragraphs 103-105 of s42A report support this change.~~

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Advice Note: *The date specified in Condition 18 is the date that the application for this consent was notified.*

~~18 To prevent saline contamination, the council may require the Consent Holder to cease the exercise of this consent at all such times as the trigger levels specified in the approved GCMP are exceeded.~~

~~19~~

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Community Liaison Group and Meetings

~~20 The Consent Holder shall, for the purpose of discussing matters relating to this consent, including the results of monitoring and input into any review of conditions, form and maintain (including providing all administrative support) a water user group (hereafter referred to as the Aupōuri Water User Liaison Group (AWULG)). The AWULG shall invite representatives of consent holders/groundwater users; mandated representatives from Te Aupōuri, Ngai Takoto, Ngāti Kuri, Te Rarawa, Ngāti Kahu, Te Potahi Marae, Kaimaumau Marae, Paparore Marae and Waioira Marae; the Department of Conservation; Far North District Council; and the Northland Regional Council.~~

~~21 The Consent Holder shall hold a meeting of the AWULG not less than once every year in August. Prior to the meeting, the Consent Holder shall provide a copy of the Annual Monitoring Report required to be prepared in accordance with Condition 22 and a summary of the water use records and static water level monitoring result for the same period as the report to each representative of the group. The meeting shall be held at a time and venue convenient for the majority of the AWULG members.~~

Reasoning for deletion:

- ~~(1) A requirement to form a liaison group and to meet to discuss consents is impractical and the need is not evident given that whatever information is submitted to NRC in relation to consent activity reporting is discoverable by the public, including these particular parties.~~
- ~~(2) Aside from Te Aupouri and DoC, none of these other parties submitted on the applications so how can a third party be included in a consent condition that hasn't considered themselves affected?~~
- ~~(3) There are no supporting policies or methods in the relevant plans that would require this type of condition to be carried through consistently on ALL activities of this nature in the area. There is a need to have a robust framework in place so that new applications are required to address this upfront in their applications to be considered complete under s88 RMA. Furthermore, there is a stronger case for NRC should conditions be objected or appealed both for current and future proposals or if they wish to review existing consents to incorporate this as a condition on their consents seeing as the effect of abstraction is cumulative.~~
- ~~(4) NRC have reserved their ability to review consent to deal with any adverse effects on the environment that may arise from the exercise of the consent and which it is appropriate to deal with at a later stage: or to review the allocation of the resource. This is sufficient. I also disagree that such a condition encourages whanaungatanga or kaitiakitanga unless tangata whenua have asked for this to occur.~~

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Reporting

2219 The Consent Holder shall prepare an Annual Monitoring Report (AMR) for the period 1 July to 30 June (inclusive) and forwarded a copy to the council's assigned monitoring officer and mandated representatives from Te Aupōuri, Ngai Takoto, Ngāti Kuri, Te Rarawa, Ngāti Kahu, Te Potahi Marae, Kaimaumu Marae, Paparore Marae and Waiora Marae; the Department of Conservation; Far North District Council by the following 31 July. The AMR shall include, but not be limited to, the results, update and summary report of the monitoring undertaken as required by the GCMP.

Reasoning for insertion:
Monitoring reports supplied to Iwi, hapu and marae gives effect to the requirements of the RMA in relation to Maori. Te Tiriti principles are best addressed at the consent authority level rather than at the consent holder level.

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Advice Note: *It is anticipated that a single Annual Monitoring Report will be prepared and submitted on behalf of all consent holders within the Motutangi-Waiharara Water Users Group.*

Review Condition

2320 The council may, in accordance with Section 128 of the Resource Management Act 1991, serve notice on the Consent Holder of its intention to review the conditions annually during the month of June for any one or more of the following purposes:

- (a) To deal with any adverse effects on the environment that may arise from the exercise of the consent and which it is appropriate to deal with at a later stage; or
- (b) To review the allocation of the resource.

The Consent Holder shall meet all reasonable costs of any such review.

Lapsing Condition

2421 This consent shall lapse on the **30 April 2023**, unless before this date the consent has been given effect to.

Advice Note: *An application can be made to the council in accordance with Section 125 of the Act to extend the date after which the consent lapses. Such an application must be made before the consent lapses.*

EXPIRY DATE: ALL EXCEPT STANISICH 30 NOVEMBER 2033

EXPIRY DATE: STANISICH 30 NOVEMBER 2025

General Advice Notes

- I. The parcels of land identified on this consent where water may be used for the purpose of irrigation of horticultural and/or agricultural land may be added or changed by providing Council with Computer Freehold Register title confirming ownership of land by the consent holder or written approval from the landowner for the consent holder to use water for irrigation of horticultural and/or agricultural crop on their land. This

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change does not give express permission or a right to increase consented allocation amounts on this consent.

Reasons for insertion:

This advice note supports the addition of wording allowing for more flexibility to identify and use other land areas (see Appendix 1) whilst ensuring that it is clear to consent holders that any increase in amounts of consented allocation would require an application for either a change to the current consent or a new consent, depending on the scale and nature of the changes to allocation sought.

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- II. Increases to consented allocated amounts will require an application for resource consent to be lodged with the Council to assess the sustainability of the changes sought. Dependent on the scale and nature of the effects of the changes sought, Council may receive and consider the application as a change of conditions or as a new consent application. Pre-application discussions with Council are recommended in this situation.

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Reasons for insertion:

Supports consent holders by outlining their obligations in relation to any change to increase consented allocation amounts and also provides an educational pathway to best approach a potential change of consent.

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- III. It is the responsibility of the consent holder to assess whether any other resource consents may be necessary for activities associated with the exercise of this consent and to obtain resource consent if necessary.

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Reason for insertion:

Helps consent holders by pointing out that there may be other resource consents necessary to exercise this consent, such as the use of pesticides and herbicides.

Commented [ML2]: Remove the pesticide WQ monitoring but include advice note.

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SCHEDULE 1: REQUIREMENTS FOR GROUNDWATER MANAGEMENT AND CONTINGENCY PLAN (CONDITION 17)

NOTE: Alternative conditions will be tabled at the hearing.

1. INTRODUCTION

Extensive environmental monitoring is required to ensure the effects on the environment are no greater than those anticipated to support the proposed 'adaptive management' approach involving a staged increase of extraction. The purpose of the GCMP is to formalise specific monitoring requirements, establish groundwater level and groundwater quality monitoring triggers and outline a process for implementation of appropriate mitigation measures in the event that nominated trigger values are exceeded.

The GCMP is intended to allow the early detection of any impact to the Motutangi-Waiharara groundwater system associated with the exercise of groundwater take consent(s), by:

- Ensuring regular monitoring of the groundwater system both on and off-site;
- Setting monitoring criteria to indicate potential impact on the groundwater system;
- Informing the Northland Regional Council when changes in the pumping regime are required;
- Reviewing monitoring data after a step level increase in pumping rate;
- Ensuring that the monitoring data is available for regular review by the Northland Regional Council; and
- Detailing a Contingency Plan to be implemented if an unanticipated impact(s) is identified.

The Groundwater Management Plan will also provide information as to the actual effects of the abstraction on the groundwater resource and enable validation of the numerical model by the Consent Holders for any replacement application of the consent to take groundwater.

This schedule sets out the requirements to be addressed in the GCMP required by Condition 17. Any deviation from this schedule must be in response to additional technical information provided to NRC by the consent holder, including baseline monitoring results. Additional information supporting any change to the recommendations in this schedule must be provided with the GCMP for approval by NRC under Condition 17 prior to the commencement of groundwater abstraction.

2. SENTINEL BORES

Sentinel bores will be utilised as the primary reference sites for regional groundwater levels and quality.

Sentinel bores will be continuously monitored for water levels and electrical conductivity in individual piezometers to provide an indication that water groundwater levels are approaching a threshold where the risk of saline intrusion is increased and identify any variation in water quality that could indicate the landward migration of the saline interface.

Commented [ML3]: A summary of the environmental effects which the monitoring in this Schedule addresses would be useful. Currently I interpret this Schedule seeks to monitor and respond to the effects of saline intrusion, aquifer water level change, land use effects on water quality and bore interference effects.

Details of the location of the new sentinel bores as set out in Table 1 below will be required as part of the GCMP.

TABLE 1: Sentinel Monitoring Bores

Monitoring Bore/ Bore Number	Indicative Depth/ Piezometer ID	Parameter	Indicative Trigger level ³
NRC Waterfront 200210	1	Water Level	2.0 m asl
	2	Water Level	2.0 m asl
	3	Water Level	1.5 m asl
	4	Water Level	1.5 m asl
NRC Kaimaumau	Shallow (<10 m) (LOC.315766)	Water Level Electrical Conductivity	1.0 m asl 60 mS/cm >x departure from baseline
	Deep (LOC.316222)	Water Level Electrical Conductivity	2.0 m asl 60 mS/cm >x departure from baseline
Motutangi ¹	Shallow (<10m)	Water Level Electrical Conductivity	1.0 m asl 60 mS/cm >x departure from baseline
	Deep (shellbed)	Water Level Electrical Conductivity	2.0 m asl 60 mS/cm >x departure from baseline
Norton Road ²	Shallow (<10m)	Water Level Electrical Conductivity	1.5 m asl 60 mS/cm >x departure from baseline
	Deep (shellbed)	Water Level Electrical Conductivity	2.0 m asl 70 mS/cm >x departure from baseline

¹ New sentinel monitoring bore comprising shallow (<10 metres) and deep (shellbed) piezometers, constructed in the Motutangi sub-area. The bore will be located:

- east of Far North Road
- as close to the margin of Kaimaumau wetland as practicable
- >1 kilometre from any existing/proposed groundwater abstraction

² New sentinel monitoring bore comprising shallow (<10m) and deep (shellbed) piezometers, constructed in the Norton Road area:

- within 500 m of the coastal marine area
- as far as practicable from any existing/proposed abstraction

³ Groundwater level and electrical conductivity triggers for individual monitoring bores/piezometers will be established on the basis of an analysis of background values at each site and agreed with the NRC. Triggers may include numerical triggers for individual parameters as well as thresholds for departure from a reference baseline (expressed in terms of numerical values or % of the baseline).

3. SALINE INTRUSION MONITORING

Quarterly monitoring of key salinity indicators in new or existing bores at key locations around the northern margin of Rangaunu Harbour is required. This area is adjacent to the largest concentration of proposed abstraction, in an area where the potential for saline intrusion is elevated due to a flat hydraulic gradient (particularly toward Kaimaumuau settlement where groundwater is used for potable and farm water supply). Reference to the existing NRC state of the environment monitoring sites at Houhora and Kaimaumuau which are monitored quarterly is also required.

Proposed monitoring sites include:

- the existing Fishing Club bore at Houhora (monitored quarterly by NRC).
- the existing shallow and deep Kaimaumuau sentinel bores (monitored quarterly by NRC).
- a new or existing bore in or near the Kaimaumuau settlement accessing the shallow sand aquifer (<20 metres).
- a new or existing bore in or near the Kaimaumuau settlement accessing the shellbed aquifer (>50 metres).
- proposed production bores in the Norton Road area located within 1 km of the coastal marine area.

Salinity indicators monitored shall include:

- Electrical conductivity.
- Chloride.
- Sodium.
- Total Dissolved Solids.

The GCMP shall specify additional monitoring and contingency measures to be undertaken in the event that any nominated trigger is exceeded in an individual monitoring bore/piezometer.

A recommended monitoring schedule is set out in Table 2 below. Any deviation from this schedule must be in response to additional technical information including baseline monitoring results, and provided with the GCMP for approval by NRC under Condition 17 prior to the commencement of groundwater abstraction.

TABLE 2: Proposed Monitoring Schedule – Saline Intrusion

Monitoring Bore	Area	Parameter	Frequency	Indicative Trigger Level ¹
Fishing Club (NRC)	Houhora	Salinity Indicators + major ions	Quarterly	<ul style="list-style-type: none"> ▪ EC > 60 mS/cm ▪ Chloride >100 mg/L ▪ Departure of any individual parameter >x from baseline
NRC Kaimaumuau sentinel (shallow)	Kaimaumuau	Salinity Indicators + major ions	Quarterly	
NRC Kaimaumuau sentinel (shallow)	Kaimaumuau	Salinity Indicators + major ions	Quarterly	
Kaimaumuau Settlement - shallow (<20 metres)	Kaimaumuau	Salinity Indicators	Quarterly	
Kaimaumuau Settlement - deep (>50 metres)	Kaimaumuau	Salinity Indicators	Quarterly	

Monitoring Bore	Area	Parameter	Frequency	Indicative Trigger Level ¹
APP.038328.01.01	Norton Road	Salinity Indicators	Quarterly	
APP.038380.01.01	Norton Road	Salinity Indicators	Quarterly	
APP.038454.01.01	Norton Road	Salinity Indicators	Quarterly	

¹ Specific triggers for individual monitoring bores will be agreed with the NRC once baseline data is available to characterise water quality at each monitoring site

4. WATER LEVEL MONITORING

Monthly water level monitoring is required in all MWWUG production bores during the winter months (nominally May to September) to provide information to identify any inter-annual variations in aquifer storage which may be anomalous compared to regional trends. No specific triggers will be established for this monitoring.

Water level monitoring is also required in a shallow observation bore adjacent to the APP.038471.01.01 production bore to quantify any localised drawdown effects in the shallow sand aquifer in the vicinity of a relatively large abstraction proximal to Kaimaumu Wetland. This monitoring information will enable comparison of shallow water levels in the vicinity of a significant concentration of abstraction (within the area of maximum in the shallow aquifer modelled in the AEE), with those recorded in the shallow piezometers in the four sentinel bores distributed across the wider Aupōuri Aquifer.

TABLE 3: Proposed Monitoring Schedule – Water Levels

Monitoring Bore	Area	Parameter	Frequency
All MWWUG production bores	Houhora, Motutangi, Waiparera	Water Level	Monthly
APP.038471.01.01 shallow observation bore	Motutangi	Water Level	Continuous

5. WATER QUALITY MONITORING

Water quality monitoring shall be established in shallow piezometers located down-gradient of representative orchard areas in the Motutangi and Waiparera sub-areas. Piezometers shall be sampled on a six-monthly basis for major ions and nutrient concentrations.

Reason for deletion:

~~Outside of scope as addressed through RWSP, RAQPN and PRPN as permitted activities. Included advice note above.~~

~~It is also recommended that annual sampling is undertaken for any pesticides identified in the GCMP which exhibit characteristics which increase the potential to leach to groundwater (e.g. persistent, soluble, mobile).~~

It is recommended the GCMP include provision for periodic review of groundwater quality monitoring results as well as the nature and scope of continued monitoring.

TABLE 5: Proposed Monitoring Schedule – Water Quality

Commented [ML4]: Unsure about how these results will be used as usually there is a comparative site or background condition site as the baseline?

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Commented [ML5]: Outside of scope as addressed through RWSP, RAQPN and PRPN as permitted activities. Included advice note above.

Sub-area	Location	Parameter	Frequency
Motutangi	Shallow piezometers down-gradient of two representative planted areas	<ul style="list-style-type: none"> - Electrical Conductivity - Major ions - Dissolved reactive phosphorus - Nitrate - Ammoniacal Nitrogen - Total Nitrogen - Annual pesticide screen (targeting any persistent, leachable compounds identified in the GCMP which are identified as being in widespread use) 	Six monthly, with a review of monitoring results after five years (to assess value of continued monitoring)
Waiparera			

Reason for deletion

~~This condition did not distinguish whether it applies to an efficient bore take only. All assessment concludes that efficient bore takes would not be affected in a more than minor manner yet there are extensive conditions requiring:~~

- ~~(a) Staff time to investigate a complaint~~
- ~~(b) Staff time to review monitoring and SoE~~
- ~~(c) Staff time to come to an opinion~~
- ~~(d) Staff time to inform consent holder (and complainant?) of their opinion~~

~~This does not conform to Policy D.2.1(6) as it does not focus on the effects and it is unclear how Policy D.2.1(4) of the PRP would be achieved as NRC were unable to provide me with a range of potential compliance monitoring costs for such a condition.~~

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6. IMPACT ON EXISTING USERS

~~In the event that there is a query or complaint as to potential effects of exercise of the consent, the Consent Holder and the council's Monitoring Manager shall be notified of the receipt of the complaint/query.~~

Commented [JW6]: Potential effects is broad and covers anything, but I think the potential effects are broader than just potential lowering of the groundwater table in relation to existing and permitted bores.

~~The complaint/query will be registered on the Northland Regional Council Incident Database and processed in accordance with the procedures set out in the "Northland Regional Council Incident Procedure Manual".~~

I think you could leave the text as is, but just attack the whole condition on the points raised above.

~~Staff of the Northland Regional Council will carry out an investigation as soon as is practicably possible to assess if the water level decline is likely to be attributable to the exercise of the consent.~~

~~This investigation will review the Consent Holder's monitoring records and the SOE monitoring results. If, in the opinion of the council's Monitoring Manager the water level decline may be attributable to the exercise of the consent, the Consent Holder will immediately initiate the Mitigation Plan as detailed in Section 7.~~

~~In accordance with Northland Regional Council policy, in the event that an investigation determines that the effects are attributable to the exercise of one or more of the consents held by members of the Water Users Group, the relevant Consent Holder(s) shall meet the actual and reasonable costs of the investigation.~~

7.6. MITIGATION PLAN

The GCMP shall set out a Mitigation Plan to be initiated immediately upon the relevant Consent Holder(s) receiving notification from the council's Monitoring Manager, and/or any of the trigger levels set out in the GCMP being exceeded.

Mitigation measures shall include:

- Review/evaluation of monitoring data (particularly with respect the magnitude of anticipated environmental effects).
- Increases in the frequency and location of monitoring.
- Changes to parameters being monitored.
- Further hydrogeological, hydrological or water quality investigations to identify the potential causes of the trigger level exceedance.
- Specific reductions in the rate/volume of groundwater abstraction.
- Development of strategies to avoid future trigger level exceedances.

Appendix 1 – Legal Descriptions of Use Areas.

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<u>Application No.</u>	<u>Applicant Name</u>	<u>Legal descriptions of use areas</u>
<u>APP.038610.01.01</u>	<u>Mapua Avocados Ltd</u>	<u>Lot 1 Deposited Plan 349598, Lot 2 Deposited Plan 373078, Section 47-48, 53, 66-67, 79, 87, 89-91 Block XV Houhora East Survey District, Part Section 13 & 51 Block XV Houhora East Survey District and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.038471.01.01</u>	<u>Honeytree Farms Ltd</u>	<u>Lot 2 Deposited Plan 497050 & Section 53-55 Block IV Opoe Survey District and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.038410.01.01</u>	<u>Georgina Tui Covich & Mate Nicholas Covich</u>	<u>Section 5, 9-10, 16, 19, 27, 30-32, 34, 39-40 Block IV Opoe Survey District and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.038420.01.01</u>	<u>Largus Orchard Ltd Partnership</u>	<u>Part Section 38, Sections 52-53, 60, 118 & 129^a Block V Opoe Survey District and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.039332.01.01</u>	<u>Logan King Trustee Ltd</u>	<u>Lot 2 Deposited Plan 452703 and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.038454.01.01</u>	<u>Elbury Holdings Ltd</u>	<u>Lot 2 Deposited Plan 13971, Lot 1 & 4 Deposited Plan 22761 and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.038328.01.01</u>	<u>Bernard Kim Shine & Sheryl Dianne Shine</u>	<u>Part Lot 1 Deposited Plan 13971 and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.0327391.01.02^b</u>	<u>Ivan Anthony Stanisich</u>	<u>Sections 47, 50, 55 & 61 Block V Opoe Survey District, Part Sections 101 & 41 Block V Opoe Survey District, Lot 1 Deposited Plan 129554, Lot 1 Deposited Plan 322899 and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.038589.01.01</u>	<u>Alma Violet Thompson, Josephine Suzanne Thompson, Neil Thompson, Steven Thompson</u>	<u>Lot 2 Deposited Plan 178824 and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.038650.01.01</u>	<u>Anthony William Hewitt & Diane Eleanor Hewitt</u>	<u>Lot 1 & 2 Deposited Plan 194160 and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.0338591.01.01</u>	<u>Cypress Hills Ltd</u>	<u>Lots 8 & 10 Deposited Plan 178824, Lot 1 Deposited Plan 336507 and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.039345.01.01</u>	<u>Ongare Trust</u>	<u>Lot 1 Deposited Plan 101943 and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.038732.01.01</u>	<u>Katherine Yvonne Bryan Valadares</u>	<u>Lot 3 Deposited Plan 477138 and other parcels to be approved by Council upon receipt of Computer</u>

		<u>Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.038380.01.01</u>	<u>Katherine Holloway & Damien Holloway</u>	<u>Lot 1 Deposited Plan 193935 and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.038513.01.01</u>	<u>Caroline Nadine Carr & Jonathan Charles Brien</u>	<u>Lot 3 Deposited Plan 425051 and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.038513.01.01</u>	<u>Te Runanga o Ngai Takoto</u>	<u>Lot 6 Deposited Plan 405064 and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>
<u>APP.039244.01.01</u>	<u>Danielle O'Connor & Kevin Wayne Thomas</u>	<u>Lot 1 Deposited Plan 505956 and other parcels to be approved by Council upon receipt of Computer Freehold Register title or landowner written evidence confirming interest in the land.</u>