WILLIAMSON
WATER & LAND ADVISORY
Adding value through sustainable & efficient use of natural resources

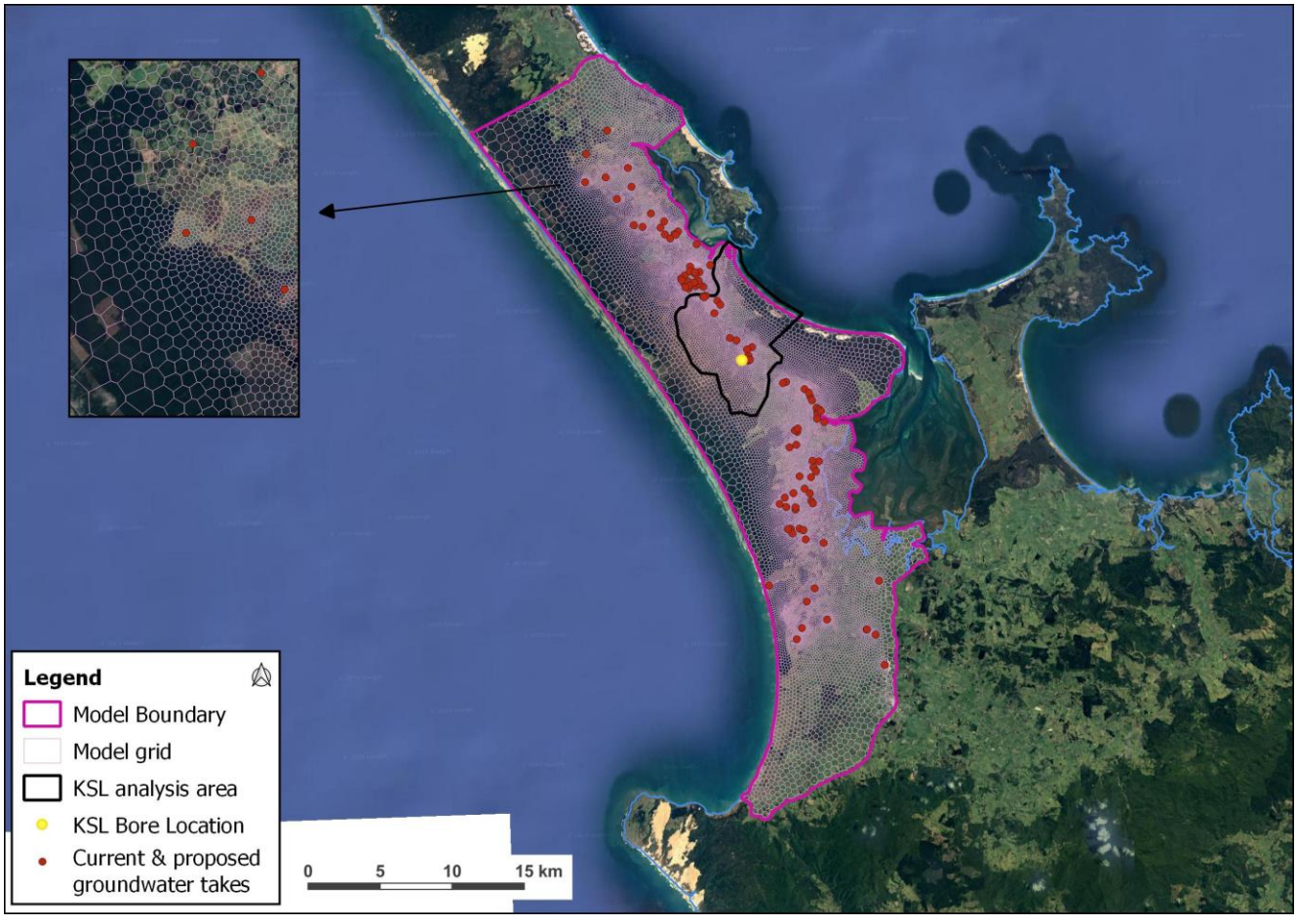
Irrigation Water Take Consent

Resource Consent Application & Assessment of Environmental Effects

KSL LIMITED

WWA0105| Rev. Final

29 March 2019



Irrigation Water Take Application

Project no:	WWA0105
Document title:	KSL Limited
Revision:	Final
Date:	29 March 2019
Client name:	KSL Limited
Project manager:	Jon Williamson
Author(s):	Jon Williamson, Jacob Scherberg and Jessie Loft
File name:	G:\Team Drives\Projects\KSL Limited\WWLA0105_Turk Vallery Road 90 m3\Deliverables\KSL AEE.docx

Williamson Water Advisory

PO Box 314,
Kumeu 0841,
Auckland
T +64 21 654422

Document history and status

Rev	Date	Description	By	Review	Approved
1	26 March 2019	Draft for Client Review	Jake Scherberg		Jon Williamson
2	29 March 2019	Final Draft	Jake Scherberg		Jon Williamson

Distribution of copies

Rev	Date issued	Issued to	Comments

Contents

1. Introduction

This document and attachments, prepared on behalf of KSL limited (KSL) comprise a Resource Consent Application and an Assessment of Environmental Effects associated with a water take permit for irrigation of a 10-hectare Orchard at 84 Turk Valley Rd, Motutangi.

The background details of this application using Northland Regional Council's (NRC) "Application for Resource Consent" form is provided in **Appendix A**. Further details of various items where marked on the form are provided in the **Section 2**.

1.1 Report Structure

The report comprises:

- **Section 2** – a description of the proposed activity and suggested consent conditions;
- **Section 3** - background details of the application;
- **Section 4** – an assessment of environmental effects;
- **Section 5** – an assessment of cultural effects;
- **Section 6** - an assessment of statutory considerations;
- **Section 7** – a discussion of the notification process;
- **Section 8** – a discussion on consideration of consultation; and
- **Section 9** – summary and conclusions.

2. Description of Proposed Activity

2.1 Location

Figure 1 provides a map of the project area. The subject bore is located at end of Turk Valley road, Motutangi (see **Appendix A**) and is registered in the NRC database as LOC.209585.

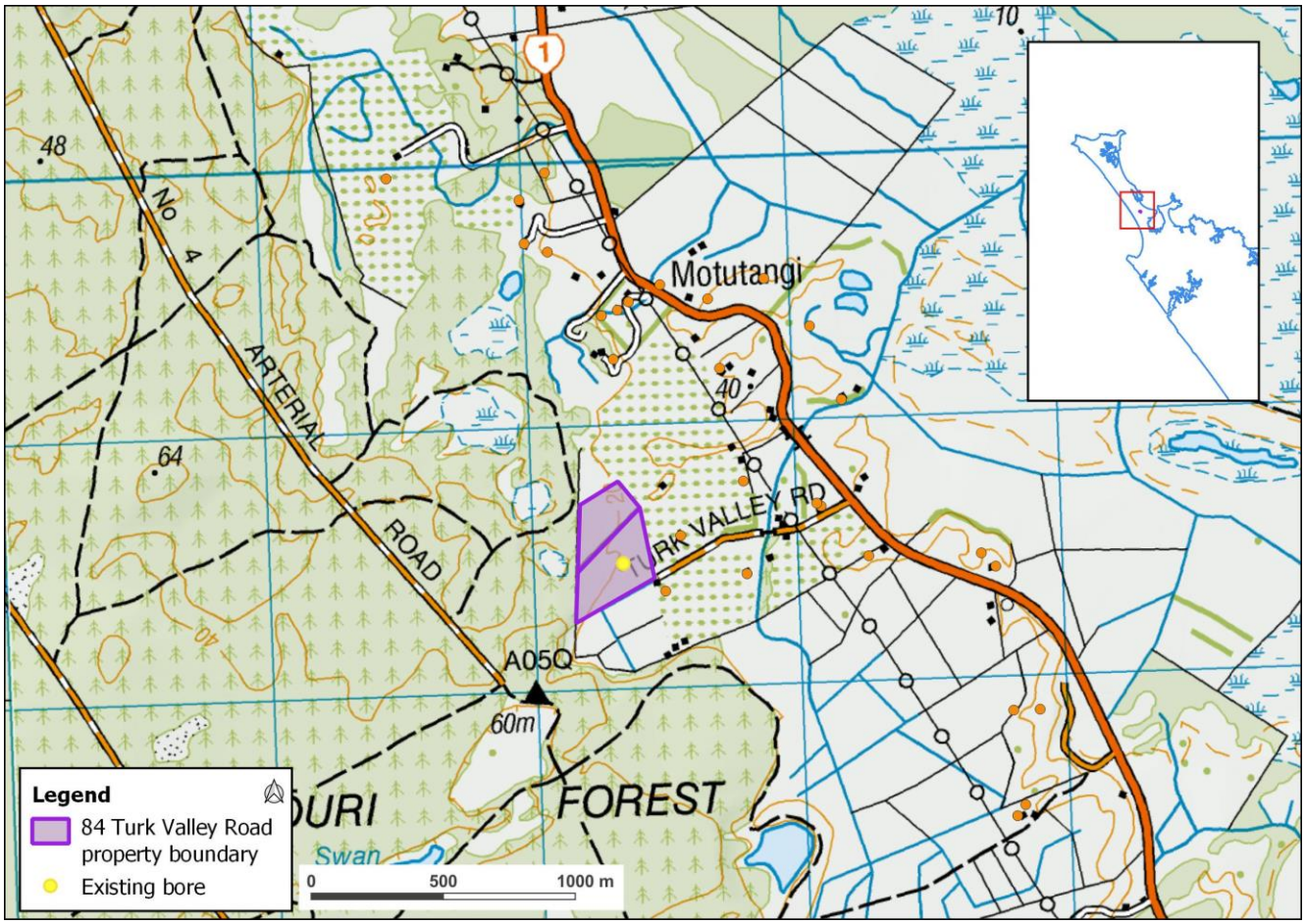


Figure 1. Project location map.

2.1 Description of Proposed Activity

The resource consent application for KSL Limited seeks to take and use groundwater from a current bore to develop and irrigate a new avocado orchard. The property, shown in **Figure 1**, has a Total Orchard Area of 10 ha. The existing bore on the property will be used as the irrigation bore for the new avocado orchard. Bore details are shown in **Table 1**.

The property owners already hold an existing consent to take and groundwater at a daily rate of up to 160 m^3/d and an annual amount of up to 26,400 m^3/year (AUT.039628.01.02). To reach the industry standard of 25 m^3/ha/day (total orchard area) and 400 mm/ha/year (total canopy area) the property owners are seeking to increase their groundwater take consent volumes to 250 m^3/d and 30,000 m^3/year, comprising an increase of 90 m^3/day and 3,600 m^3/year.

Table 1. Bore details of the proposed application.

IRISID	Easting	Northing	Depth (m)	Diameter (mm)	Cased Interval (m)	Screened Interval (m)	Static Water Level (mBGL)	Aquifer
LOC.209585	1614554	6138575	114	100	unknown	unknown	-6.6	Aupouri shellbed

The proposed groundwater take will be exercised from October to April, in accordance with the following total volumes:

- Maximum daily volume of 250 m^3/day, and increase of 90 m^3/day above the existing consent; and
- Maximum annual volume of 30,000 m^3/year, an increase of 3,600 m^3/year above the existing consent.

The maximum daily volume has been calculated at 25 m^3/ha/day over the Total Orchard Area, in accordance with the decision made in the Motutangi-Waiharara Water User Group (MWWUG) decision[1].

The maximum annual volume has been calculated from the canopy area, which for this orchard (given the topographic and existing building constraints) is 75% of the Total Orchard Area or 7.5 ha[2]. The maximum annual volume has been calculated on the basis of 400 mm/annum, which is consistent with the Council Officers' recommendation in the MWWUG Hearing. This irrigation requirement is adequate to meet up to a 1 in 10 years drought requirement (**3.1.4**).

2.1.1 Pump Specification

The current bore is outfitted with a Franklin Electric Submersible D-54516 Typ 224 5633301 5.OHP 2823639010. The maximum pumping rate is 4 l/s. The pump is fitted with a meter to measure the amount of water that is taken.

2.1.2 Consent Duration, Lapse and Review

A consent duration of 30 years is sought subject to a lapse period of 5 years from commencement of consent, and review conditions have been proposed for the purposes laid out in **Section 2.2**.

2.2 Proposed Consent Conditions

This section contains the proposed conditions for the water permit sought by the Applicant.

Water Extraction Volumes

1. The rate of take shall not exceed the limits set out as follows:
   (a) Maximum daily volume of 250 m^3/day (being any 24 consecutive hours); and
   (b) Maximum annual volume of 30,000 m^3/annum (being 1 July to 30 June).

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.

[1] The maximum daily volume can also be calculated on the basis of 41.6 m^3/day per canopy hectare (4.16 mm irrigation system capacity) on the basis of a peak daily soil requirement of 3.74 mm/day per canopy hectare and allowing for 10% system losses in delivery and application.
[2] The maximum annual volume can also be calculated on the basis of approximately 96 days at full daily volume, which is equivalent to approximately 400 mm/year. In practice the maximum daily rate will only be required on consecutive days during the peak of summer and when this coincides with drought.

Metering and Abstraction Reporting

3. The Consent Holder shall install a meter to measure the volume of water taken, in cubic metres, from each production bore. Each meter shall:

   (a) Be able to provide data in a form suitable for electronic storage;

   (b) Be sealed and as tamper-proof as practicable;

   (c) Be installed at the location from which the water is taken; and

   (d) 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.

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.

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 have an electronic datalogger for automatic logging of meter data. A copy of the electronic data records shall be forwarded to Council's assigned Monitoring Officer by the 7th of the following month, and immediately on written request from the assigned monitoring officer.

7. 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 eight hours after cessation of pumping. The Consent Holder shall also monitor electrical conductivity at least once a month during any irrigation season when the bore is in use.

8. A copy of the records required to be kept by Conditions 5, 6 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 Compliance Manager 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.

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

Water Use Efficiency

10. The Consent Holder shall prepare an Irrigation Scheduling Plan (ISP) that 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.

11. The Consent Holder shall not exercise this consent until the ISP required by Condition 10 has been certified by the Council's Compliance Manager.

12. The ISP certified 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.

13. The Consent Holder shall, within six months of the first exercise of this consent, undertake an audit of the irrigation system and the ISP described in Condition 10 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. A follow-up audit shall occur at five yearly intervals throughout the term of this consent, with a focus on the efficiency of water use.

14. 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.

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

16. here 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 this consent.

Review Condition

17. 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

18. This consent shall lapse on the **30 June 2024**, 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: 30 June 2049

3. Background Information

3.1 Site Conditions

3.1.1 Soils

There is no Landcare Research S-map soil data available for this site, however there is Fundamental Soil Layer information, pre-dating S-Map, which describes the soil around the property as having slow permeability densipan podzol[3],weakly developed sandy recent soils[4], brown soils[5] which occur in places where summer drought is uncommon, and Mesic organic soils[6] which is moderate decomposed peat. These soils display the following properties:

- ***Physical properties*** – Densipan podzol are commonly cemented or compacted B horizons which relates to the slow permeability of the soil and its limited root depth, there is extreme limitations for arable use. Sandy recent soils occur on young land surfaces generally having deep rooting and high plant – available water capacity. Brown soils are relatively stable topsoils with a well-developed structure. Mesic organic soils occur in areas of wetlands or under forests which produce acidic litter, with low bulk density, bearing strength and thermal conductivity but high total available – water capacity.
- ***Chemical properties*** - Densipan podzol are highly acidic which secondary clays and minerals strongly differentiate with depth. Densipan podzol have generally low natural fertility while sandy recent soils have high natural saturation with high base saturation. Brown soils have low to moderate base saturation. Part of Mesic organic soils have mineral material but is dominated by organic matter.
- ***Biological properties*** – Densipan podzol have generally low biological activity while sandy recent soils have a continuous cover of vascular plants. Brown soils are associated with high biological activity (earthworms are prominent). Organic soils have restricted biological activity of organisms due to the anaerobic conditions, leading to a slow decomposition rate.

3.1.2 Geology

KSL Limited bore is underlain by the Aupouri Aquifer, comprising an extensive sequence of fine-grained sands, interspersed with sporadic iron pan, peat, and silt near the surface and shellbed in the deep layer. This consists of Pleistocene and Holocene unconsolidated sedimentary materials deposited in beach and dune (abandoned shorelines and marine terraces) and associated alluvial, intertidal estuarine, shallow marine, lakebed and wetland environments.

With distance inland from the coast, the sand deposits become progressively older and have a higher degree of compaction and weathering compared to the younger foredune sands located at the coast.

With increasing depth, the occurrence of shellbed layers increases. The shellbeds comprise layers that typically range in composition from 30-90% medium to coarse shell and 10-70% fine sand. The shellbed aquifer typically resides from approximately 70 to 120 mBGL. Underlying the shellbed aquifer are basement rocks of the Mount Camel Terrain, which typically comprise hard grey to dark green / black igneous rocks described in Isaac (1996) as intercalated basalt and basaltic andesite lava, pillow lava, rhyolitic tuff, tuff-breccia, conglomerate, sandstone and mudstone.

3.1.3 Hydrogeological Interpretation

The sands deposited on the east and west coast are generally younger and more permeable than the weathered sand in the central area. The shell content in the sand increases with depth, and the shell-rich sand layer is the most prolific water yielding aquifer in the region and hence the target for irrigation bores.

[3] https://soils.landcareresearch.co.nz/describing-soils/nzsc/soil-order/podzol-soils/
[4] https://soils.landcareresearch.co.nz/describing-soils/nzsc/soil-order/recent-soils/
[5] https://soils.landcareresearch.co.nz/describing-soils/nzsc/soil-order/brown-soils/
[6] https://soils.landcareresearch.co.nz/describing-soils/nzsc/soil-order/organic-soils/

The aquifer system is unconfined at the surface but behaves in a manner that suggests a progressive degree of confinement with depth (leaky confinement). There is no well-defined regionally extensive confining layer but there are numerous low-permeability layers (e.g. iron pan, brown (organic) sand, silt, peat) that vary in depth and thickness, which over multiple occurrences collectively provide a degree of confinement that leads to the development of vertical pressure gradients

All the basement rocks in the area are known to be low permeability.

3.1.4 Irrigation Requirements

The peak water requirement is 25 m^3/day per canopy hectare, which is equivalent to 2.5 mm per day. The irrigation requirement was simulated on a daily basis with the Soil Moisture Water Balance Model (SMWBM) using historical rainfall and evaporation data from 1960 to 2018. The simulation results are portrayed statistically on a monthly basis in **Figure 2**, which is a box and whisker plot showing the monthly median, lower quartile (25th percentile), upper quartile (75th percentile) and minimum and maximum recorded monthly values. The graph shows the seasonal irrigation profile and likelihood of water requirements each month.

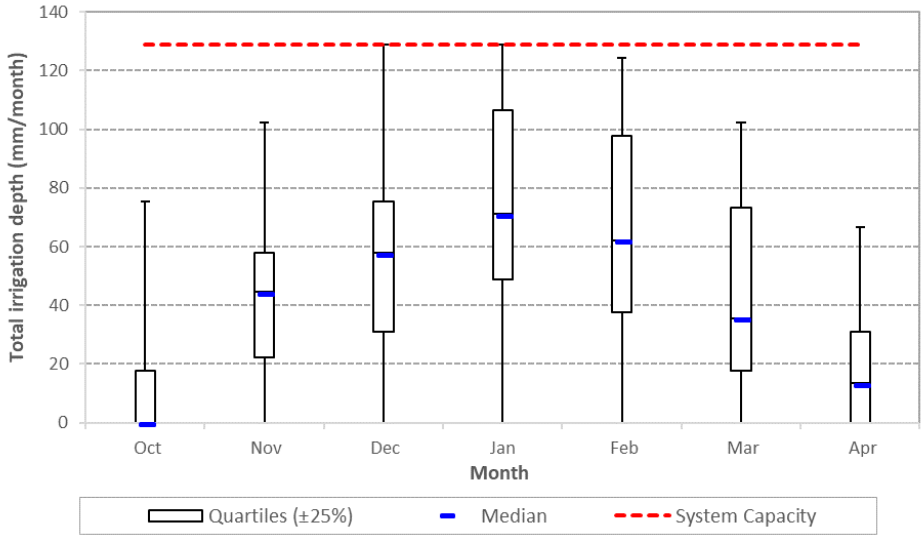


Figure 2. Simulated monthly statistical irrigation profile.

During the irrigation season, the rate of application will remain the same, but the number of days between irrigation events will increase during the shoulders of the season (i.e. typically in spring and autumn), which is exemplified in the monthly statistics shown in **Figure 2**.

Table 3 provides information on the frequency of monthly irrigation requirements and the number of days irrigation is likely required. The 1-year recurrence interval represents the typical monthly requirements and indicates that on average irrigation will not be required in October and April, and between November and March will vary from 18 mm to 47 mm per month.

In a 10-year drought year, the irrigation requirement for the season is likely to be approximately 400 mm, with peak monthly totals up to approximately 120 mm, hence the amount of water being applied for is adequate to fully meet the requirements up to the 10-year drought.

Table 2. Frequency of monthly and annual irrigation requirements (mm) and days of irrigation [days].

Average Recurrence Interval	Oct	Nov	Dec	Jan	Feb	Mar	Apr	Annual
1 yr	0 [0]	23 [6]	31 [7]	47 [11]	40 [10]	18 [4]	0 [0]	250 [60]
2 yr	0 [0]	44 [11]	58 [14]	69 [17]	62 [15]	36 [9]	16 [4]	307 [74]
4 yr	18 [4]	58 [14]	76 [18]	107 [26]	98 [24]	74 [18]	31 [7]	369 [89]
5 yr	18 [4]	62 [15]	76 [18]	107 [26]	98 [24]	80 [19]	40 [10]	382 [92]
10 yr	31 [7]	76 [18]	104 [25]	117 [28]	116 [28]	84 [20]	50 [12]	401 [96]
100 yr	53 [13]	102 [25]	124 [30]	129 [31]	124 [30]	100 [24]	64 [15]	545 [131]

Table 3 provides the orchard water balance under dryland and irrigated conditions and **Figure 3** shows the mean monthly seasonal breakdown of this data. The data represents the mean annual water balance components from the 59-year simulation. It is evident that under the irrigated orchard profile, soil moisture content typically resides at a higher status (which is the intention) during summer, and surface runoff, sub-soil drainage, soil evaporation and canopy interception all increase.

However, avoidable losses due to surface runoff have not change appreciably, and the additional runoff that has occurred is due to rainfall excess rather than too much irrigation, demonstrating that the irrigation applications of 3 mm/day are efficient.

Table 3. Summary of average annual water balance components under irrigated and unirrigated profiles (mm/yr unless specified otherwise).

Annual Average	Dryland	Irrigated
Average Soil Moisture Content (mm)	92	104
Sub-Soil Drainage	452	522
Surface Runoff	93	105
Soil ET	467	547
Canopy Interception	179	284
TOTAL	1,191	1,458

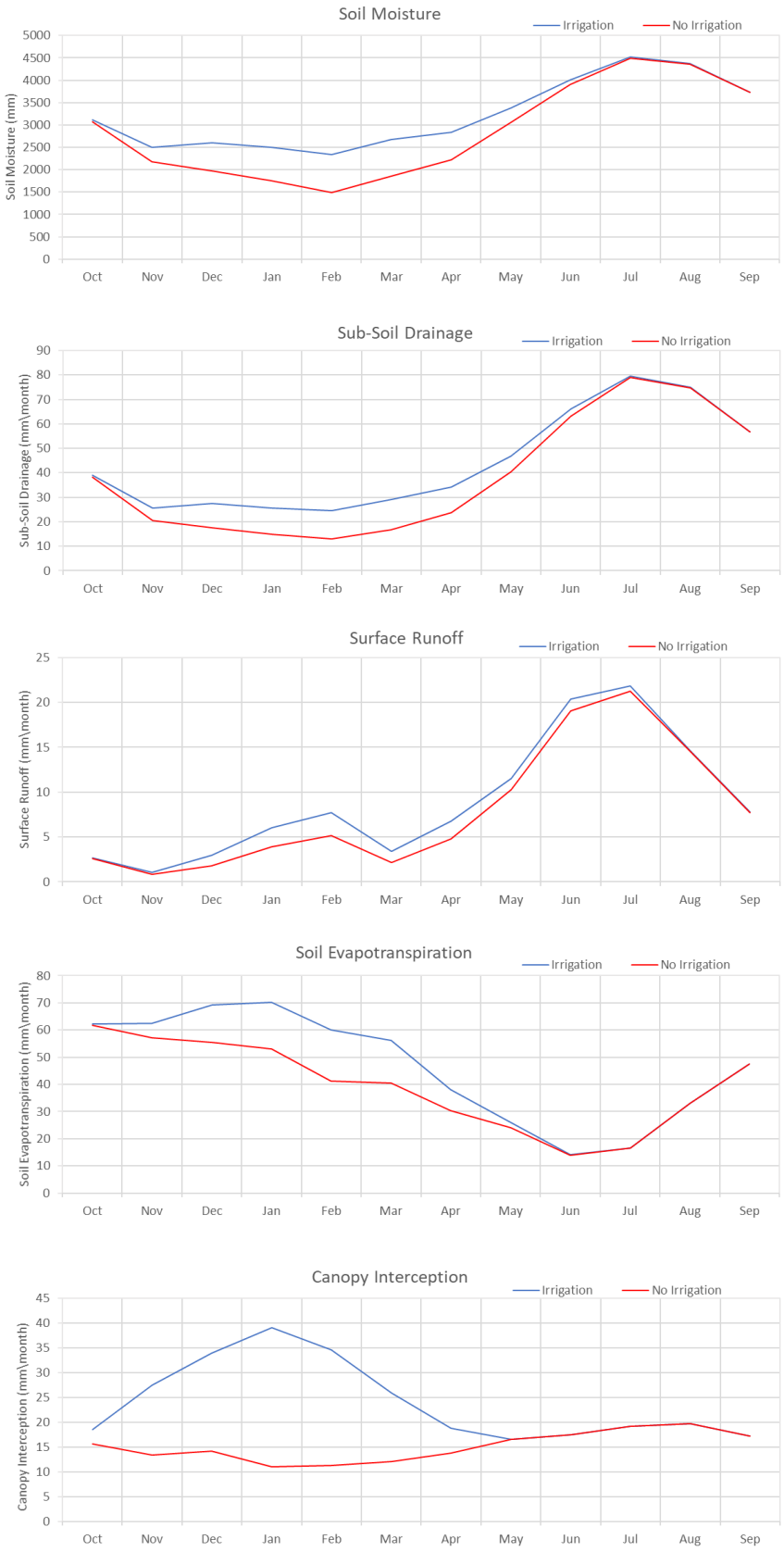


Figure 3. Comparison of water balance components.

3.2 Neighbouring Bore Information

There are 28 bores registered within the NRC database within a 2 km radius of the KSL Limited site (**Figure 4**). Statistics on the 28 bores are as follows:

- 27 are active and one is pending;
- Bore depth is provided for 27 bores and ranges from 6 m to 120 m with an average of 83 m;
- 22 bores have information attached in terms of the purpose of the bores; among these bores:
    - Seven are for irrigation;
    - Five are for stock;
    - Four are for domestic and stock use;
    - Two are for domestic;
    - Two are for domestic use and irrigation;
    - Two are for stock use and irrigation.

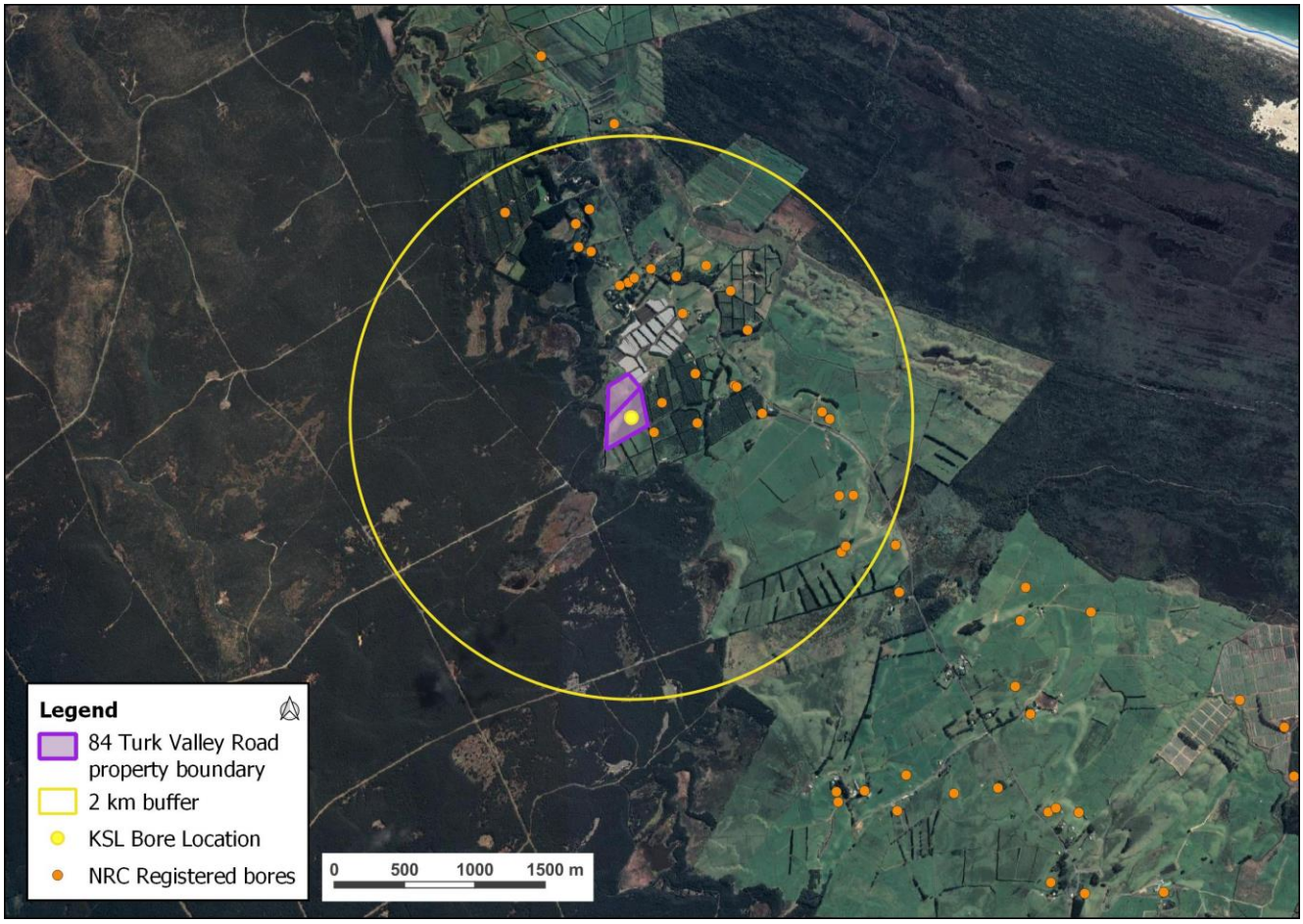


Figure 4. Neighbouring bores within 2 km radius.

3.3 Relevant Statutory Documents

3.3.1 Section 104(1)(b) of the RMA

Schedule 4 of the RMA requires that when applying for a resource consent for any activity an assessment of activities against the matters in any relevant provisions of a statutory document referred to in s104(1)(b) of the RMA must be provided. These matters are described below and **Section 6** provides an assessment against the relevant documents.

The documents referred to in Section 104(1)(b) of the RMA are:

- a national environmental standard;
- other regulations;
- a national policy statement;
- a New Zealand coastal policy statement;
- a regional policy statement or proposed regional policy statement;
- a plan or proposed plan;

The following section provides details of the relevant Regional Planning provisions, while assessment of which documents listed is above are relevant is provided in **Table 4.**

Table 4. Summary of relevance of Section 104 statutes.

Statute	Relevance	Requirement of Statue
National Environmental Standards	There are no national environmental standards that are applicable to the proposed activity.	None
Resource Management (Measurement and Reporting of Water Takes) Regulations 2010	This regulation applies to a water permit that allows fresh water to be taken at a rate of 5 litres/second or more and is consumptive. Therefore, this regulation is relevant for this water take consent.	In summary, the regulations require permit holders to keep records that provide continuous measurement of the water taken under a water permit, including water taken in excess of what the permit allows. These records are to comprise measurements of the volume of water taken each day (in cubic metres) or each week (if approved by the Regional Council), and must be in an appropriate format for auditing, and in a form suitable for electronic storage. The regulations also specify the required accuracy of any metering device (to within ±5% of the actual volume taken if from a full pipe (e.g. bore)).
National Policy Statement for Freshwater Management 2014	The following objectives and policies of the NPS are relevant to this proposal: *Water Quality* • Objectives A1, A2, andA4. • Policies A2, A3, and A7. *Water Quantity* • Objective B2, B3 and B5. • Policies B2 to B6. *Integrated Management* • Objective C1. • Policies C1 and C2.	*Water Quality* • Objective A1 seeks to safeguard the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems of fresh water, in sustainably managing the use and development of land, and of discharges of contaminants. • Objective A2 required that the overall quality of fresh water within a region is maintained or improved while improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated.

Statute	Relevance	Requirement of Statue
		• Objective A4 seeks to enable communities to provide for their economic well-being, including productive economic opportunities. • Policies A2, A3, and A7 are considered relevant to this application and give effect to Objectives A1, A2, A4. *Water Quantity* • Objective B2 seeks to avoid any further over-allocation of fresh water and phase out existing over-allocation. • Objective B3 seeks to improve and maximise the efficient allocation and efficient use of water. • Objective B5 seeks to provide for communities' economic wellbeing within freshwater quantity limits. • Policies B2 to B6 are considered relevant to this proposal. *Integrated Management* • Objective C1 seeks to improve integrated management of fresh water and the use and development of land in whole catchments, including the interactions between fresh water, land, associated ecosystems and the coastal environment. • Policies C1 and C2 are relevant to this application and give effect to Objective C1.
Regional Policy Statement for Northland	The Regional Policy Statement (RPS) was made operative on 9 May 2016. The RPS provides a broad direction and framework for managing Northland's natural and physical resources. These include land, water, air, soil, minerals, plants, animals and all built structures. The following Objectives are considered relevant to this proposal: • Objective 3.2, 3.3, 3.5, and 3.10. The following Policies give effect to the above Objectives, and therefore are considered relevant to this application: • Policy 4.3.2, 4.3.3.	• Objective 3.2 seeks to maintain and improve water quality for human use and ecological health. • Objective 3.3 seeks to safeguard the flows and flow variability required to maintain water's life-supporting capacity, for ecological processes, and to support indigenous species. • Objective 3.5 requires that the region's resources are sustainable managed in a way that is attractive for business and investment that will improve the economic wellbeing of the region and its communities. • Objective 3.10 requires efficient use and allocation of common natural resources with a particular focus on maximising the security and reliability of supple for users. • Policy 4.3.2 requires regulatory methods to avoid over-allocation of region-wide ecological flows and water levels. • Policy 4.3.3 requires the allocation and use of water efficiently within allocation limits.
Regional Plans	The Proposed Regional Plan for Northland (pRPN) sets out policies and rules for how Northland's water, soil, air and coast are used and was publicly notified on 6 September 2017 and closed for submissions on 26 March 2018. The pRPN will replace the Regional	From the pRPN: • Objective F.0.1 seeks to manage the use, development, and protection of Northland's natural and physical resources which enables people and communities to provide for their social, economic and cultural well-being while

Statute	Relevance	Requirement of Statue
	Water and Soil Plan for Northland (RWSPN), which has been operative since 28 August 2004. At present, the rules in both these plans have legal effect, with weight given to whichever plan has the more restrictive rule for the same activity if there is a conflict between the two plans, or the later plan if no submissions were received on certain aspects. Both plans address groundwater abstractions that have the potential to adversely affect the environment. However, there are no specific aquifer allocation limits set in the RWSP. The following objectives and policies of the pRPN are considered relevant to this proposal: • Objective F.0.1. • Policy D.2.2. • Policy D.2.5. • Policy D.4.5. • Policy D.4.13. • Policy D.4.17. • Policy D.4.18. • Policy D.4.20. • Policy D.4.23. The following objectives and policies of the RWSPN are considered relevant to this proposal: • Objective 7.4. • Objective 10.4.1. • Policy 10.5.1. • Policy 10.5.2. • Policy 10.5.4. • Policy 10.5.7. • Policy 10.5.9	1. sustaining the natural resources to meet the reasonable foreseeable needs of future generations, 2. safeguarding life-supporting capacities of water, and 3. avoiding, remedying, or mitigating adverse effects on the environment. • Policy D.2.2 requires that regard is had to the social, cultural, and economic benefits of the proposed activity when considering resource consents. • Policy D.2.5 requires an authority to have regard to community and tangata whenua values • Policy D.4.5 seeks to maintain overall water quality. • Policy D.4.13 seeks to achieving freshwater quantity related outcomes and inn particular manage the taking, use, damming, and diversion of fresh water so that (with relevance to this application) saline intrusion in, and land subsidence above, aquifers is avoided (amongst other things). • Policy D.4.17 considers allocation limits for aquifers and requires rules and applications to meet allocation limits • Policy D.4.18 concerns conjunctive surface water and groundwater management. • Policy D.4.20 requires the reasonable and efficient use of water for irrigation and sets requirements for a resource consent application to take water for irrigation purposes. • Policy D.4.23 From the RWSPN: • Objective 7.4 requires the maintenance or enhancement of water quality of natural water bodies. • Objective 10.4.1 maintains the sustainable use and development of the region's groundwater resources while avoiding, remedying, or mitigating actual and potential adverse effects on groundwater quantity and quality. • Policy 10.5.1 seeks to ensure the sustainable use of resources by avoiding takes that exceed recharge. Saltwater intrusion, reduced groundwater quality, significant drawdown, and adverse effects on surface water resources can arise where takes exceed recharge. • Policy 10.5.2 recognises that aquifers are at risk in certain circumstances and that adverse effects on water quality should be avoided.

Statute	Relevance	Requirement of Statue
		• Policy 10.5.4 seeks that groundwater allocations take into account reduction in recharge that may occur in time. • Policy 10.5.7 requires the Northland Regional Council to consider effects of a groundwater take and use on surface water bodies. • Policy 10.5.9 seeks to avoid, remedy or mitigate any ground subsidence as a result of groundwater takes, use or diversion, where this is likely to cause adverse flooding, drainage problems, or building damage.

3.3.2 Activity Status

The activity status of the proposed activity under both the RWSPN and pRPN is considered a discretionary activity – details of this conclusion are summarised in **Table 5.**

Table 5. Summary of activity status against Regional Plan Provisions.

Plan	Relevant Rules	Comment
RWSPN	Rule 25.03.01 of the plan 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." In essence, the discretionary activity rule is for takes that are not for domestic or stock watering purposes (Rule 25(A)) and exceed the permitted activity thresholds (Rule 25.01.01) of a daily volume of 10 m3/d and instantaneous rate of 5 L/s per bore.	Under this plan and until such time as the equivalent provisions within the Proposed Regional Plan for Northland (pRPN) are no longer contested, the proposed activity would be considered Discretionary Activity.
pRPN	Rule C.5.1.10 states that the taking and use of fresh water is a discretionary activity unless it is one of the following: 1) a permitted activity under C.5.1.1 'Minor takes – permitted activity', or 2) a permitted activity under C.5.1.2 'Temporary take for road construction or maintenance – permitted activity', or 3) a permitted activity under C.5.1.3 'Water take from an off-stream dam – permitted activity', or 4) a permitted activity under C.5.1.4 'Water take from an artificial watercourse – permitted activity', or 5) a permitted activity underC.5.1.5'Water take associated with bore development, bore testing or dewatering – permitted activity', or 6) a controlled activity under C.5.1.6 'Replacement water permits for registered drinking water supplies - controlled activity', or 7) a controlled activity under C.5.1.7 'Takes existing at the notification date of the plan - controlled activity', or 8) a restricted discretionary activity under C.5.1.8 'Supplementary allocation – restricted discretionary activity', or 9) a discretionary activity under C.5.1.9 'Takes existing at the notification date of this plan – discretionary activity', or	The proposed groundwater take does not conform to any of the activities in listed in 1) to 10) above, and as indicated in the following **Section 3.3.3** does not exceed an allocation limit, therefore the proposed activity constitutes a Discretionary Activity under the pRPN.

	10) a non-complying activity under C.5.1.11 'Water take below a minimum flow or water level-non-complying activity', or 11) a non-complying activity under C.5.1.12 'Water take that will exceed an allocation limit - non-complying activity', or 12) a prohibited activity under C.5.1.13 'Water takes that will exceed an allocation limit - prohibited activity'.	

3.3.3 Allocation Zones

The Aupouri Peninsula Aquifer is divided into different allocation zones for management purposes. The KSL Limited property sits within the Aupouri-Motutangi allocation zone. The allocation limit, current level of allocation and the level of allocation should this consent (along with other pending consents) be granted, are shown in **Table 6.**

Currently there is one pending application for a new groundwater take, Tuscany Avocados (36,000 m^3/year).

The allocation limit is calculated as 15% of mean annual recharge, as recommended by the Northland Regional Council in paragraphs 111 to 118 of the Section 42 Hearing Report (Tait, 2018).

For the purposes of this section of the AEE we have only analysed the water take increase i.e. the increase of 90 m^3/d and 3,600 m^3/year.

Table 6 shows that the Aupouri-Motutangi zone is currently 59% allocated and granting the proposed KSL Limited groundwater take (an increase of 3,600 m^3/year) will account for an additional 0.2% of the allocation limit. If the other current proposal is granted (Tuscany Avocados) the total allocation status for the Aupouri-Motutangi zone will increase to 61%.

Table 6. Aupouri Aquifer Limits[7] and Allocation Status.

Sub-aquifer	Allocation Limit [A.]		Allocation Status (Current)[B.]		Allocation Status Including Proposed Groundwater Takes: KSL Limited (3,600), Tuscany Avocados (36,000),	
	m^3/year	% mean annual recharge	m^3/year	%	m^3/year	%
Aupouri - Motutangi	1,604,487	15	941,457	59%	981,057	61%

Notes:

A. Recalculated from Lincoln AgriTech (2015).

B. Includes the recently granted (June 2018) MWWUG consents, which equated to 566,960 m3/year in the Motutangi zone. Also the already consented KSL take (26,400 m3/yr)

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

4. Assessment of Environmental Effects

The proposed 3,600 m^3/year groundwater take for the KSL Limited property was evaluated using the Aupouri Aquifer Groundwater Model (AAGWM), which is a numerical model covering the Aupouri shellbed aquifer from Ahipara to Ngataki. The model applied the MODFLOW Unstructured Grid (MODFLOW-USG) developed by the United States Geological Survey (USGS) applied within the GMS10.3 modelling platform to simulate regional groundwater flow. The development and calibration of the AAGWM is detailed in a standalone report on model development and calibration (WWA 2019). The model domain and locations of consented and proposed groundwater take are shown in **Figure 5.**

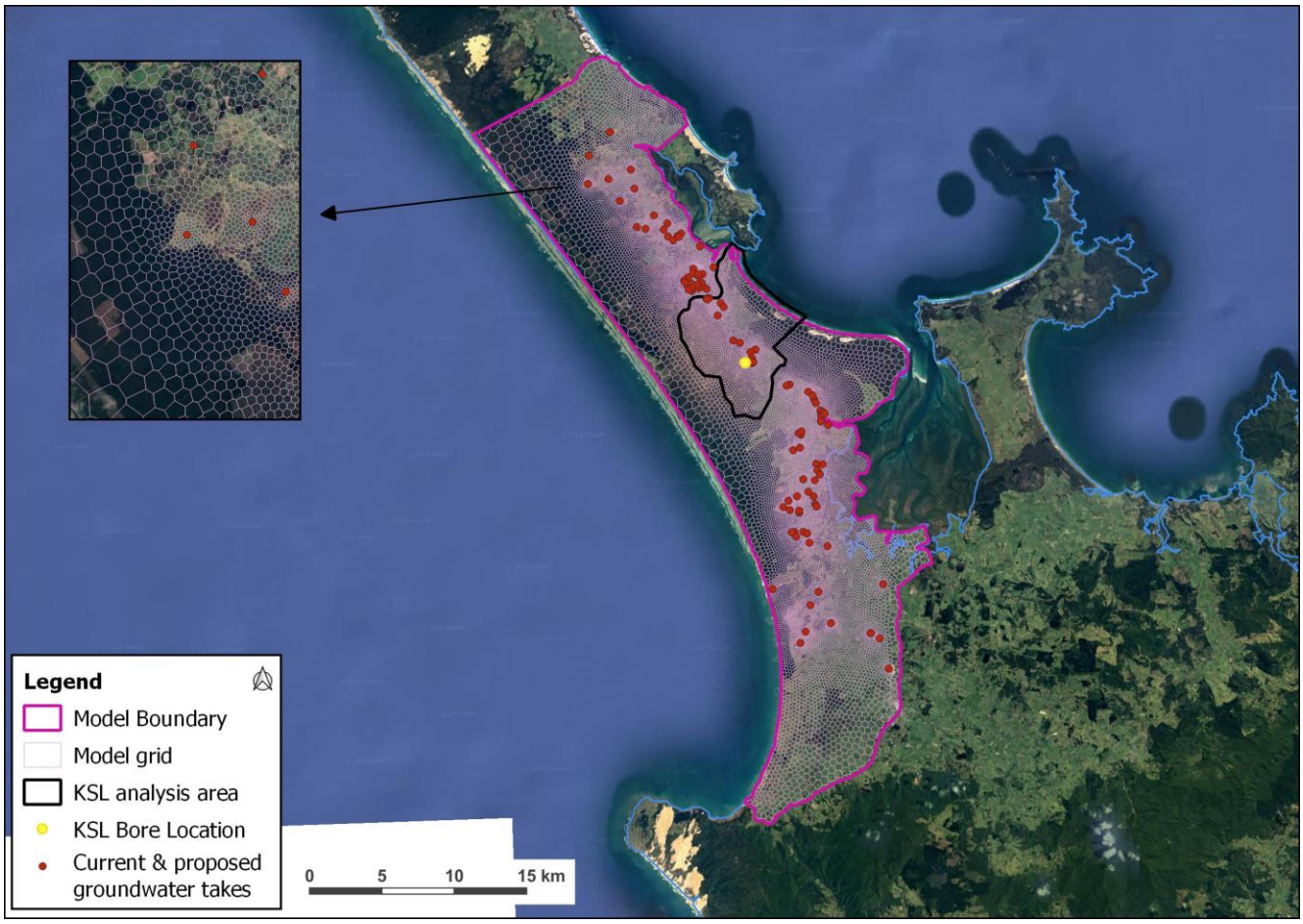


Figure 5. Aupouri Aquifer Groundwater Model domain

The Motutangi-Waiharara Groundwater Model (MWGWM), detailed in WWA (2017) is a previous numerical model that includes the area occupied by the proposed groundwater take.

The Base Case Scenario (Scenario 1) for evaluating the proposed groundwater take at the KSL bore applied the AAGWM with all currently consented groundwater takes and pending applications included. The Proposed Extraction Scenario (Scenario 2) was then developed by adding the proposed KSL groundwater take to the Base Case Scenario. The results of the two scenarios were compared to assess cumulative effect of the proposed groundwater take with regard to the AEE criteria. Simulation results were evaluated for the drainages within and around the KSL property in order to assess potential effects from proposed pumping in the area most likely to be impacted. This area is referred to in this report as the KSL Analysis Area and is shown in **Figure 5**.

This assessment also included a sensitivity analysis (Scenario 3) using the methods described in WWA (2017). In the sensitivity analysis connectivity between the surface conditions and the deep aquifer was significantly reduced while boundary and source/sink conditions remained the same as in the baseline model. The model was not calibrated to the conditions applied in Scenarios 3, therefore Scenario 3 results are only referenced to illustrate relative (rather than absolute) changes in simulated groundwater levels.

The sensitivity analysis was undertaken because the calibrated groundwater model errs on the side of over simulation of vertical leakage. This was deliberately built into the model in the absence of a single well-defined low permeability horizon in the field, but rather a series of multi-layered and discontinuous iron pans and other low permeability horizons within the sedimentary sequence that in combination act as a flow barrier between the deeper groundwater system and the surface drains and wetlands. As a result, the model exaggerates the effects of the proposed abstraction on the groundwater levels in the shallow aquifer and at the surface. Conversely, the model under-predicts the local-scale drawdown in the deeper aquifer.

The numerical simulation was run for a 58-year time period using historic climate records and groundwater pumping data. In effect, the climatic conditions of the last 58-years have been utilised to simulate conditions that may occur in the next 58-years.

The three predictive model scenarios can be summarised as follows:

- ***Scenario 1: Base Case*** – the calibration model which includes all currently consented groundwater takes at a total peak annual abstraction rate of 12,382,251 m^3/year.
- ***Scenario 2: Proposed Extraction*** – includes current and proposed groundwater extraction totalling a combined peak annual rate of 12,385,851 m^3/year.
- ***Scenario 3: Low Permeability-Proposed Extraction*** – Groundwater extraction is the same as in Scenario 2 with horizontal hydraulic conductivity of Layer 2 was decreased to $1x10^{-7}$ m/s in both the coastal sands and weathered sand regions to simulate a hard pan extending over the model area.

From an assessment of effects perspective, it is important to focus on annual volumes. However, simulated pumping in the model is premised on peak daily rates (consented or proposed) pumped until the annual volume is reached (cap). Due to variable stress period length ranging from a minimum of 13 days to a maximum of 185 days, the average pumping rate reported from the model is always less than the peak rate due to days within the stress period where pumping was not required. Historical dates where the maximum annual volume (consented or proposed) was simulated included 1974, 1991, and 2010.

4.1 Surface Water Effects

An analysis of the impact on flows including discharge to both farm drains and wetlands was undertaken for low-flow situations. Scenario 2 was selected for this assessment because it represents a greater potential impact on surface drains compared to Scenario 3. The annual minima in daily flow was determined from the global flow budget for all combined drain cells within the potential area of impact. Annual minima flows were used to calculate annual recurrence intervals for each scenario, and the resulting data is presented in **Table 7** and **Figure 6.**

A comparison of the proposed groundwater extraction (Scenario 2) against the Base Case scenario indicates that the mean annual (1-year) low flow as a result of the combined groundwater extraction at the KSL bore is likely to be virtually unchanged as a result of the proposed activities. However, as stated in WWA (2017) the model errs on the side of exaggerating groundwater level reduction in the shallow aquifer and at the surface because of the lack of hard pans in the model. In this regard, this can be considered a conservative estimate.

Results also indicate that the variation in annual minimum discharge from groundwater to surface water over a range of drought severities (i.e. annual to 100-year recurrence interval) is likely to be, at most, a 0.03% reduction with the proposed groundwater extraction. The relative flow reduction increases slightly for the more infrequent events, e.g. the 0.03% reduction in annual low flow with proposed groundwater extraction relative the

Base Case Scenario is predicted in the event of a 50 or 100-year drought. These predictions for reduced flow on the order of millilitres per second are below the resolution of the numerical model and can be taken to indicate that no measurable change in seasonal low flow will occur as a result of the prosed groundwater extraction at the KSL bore. Therefore, the impact on surface water resources due to proposed take will therefore be less than minor.

Table 7. Surface water low-flow reduction analysis. Total drain flows in the KSL analysis area.

Recurrence Interval	Scenario 1: Base Case	Scenario 2: Proposed GW Extraction	Relative Difference
(years)	(L/s)	(L/s)	(%)
1	177.33	177.31	-0.01%
2	114.73	114.71	-0.02%
5	89.28	89.26	-0.02%
10	79.93	79.91	-0.03%
25	78.00	77.98	-0.03%
50	77.01	76.98	-0.03%
100	70.62	70.60	-0.03%

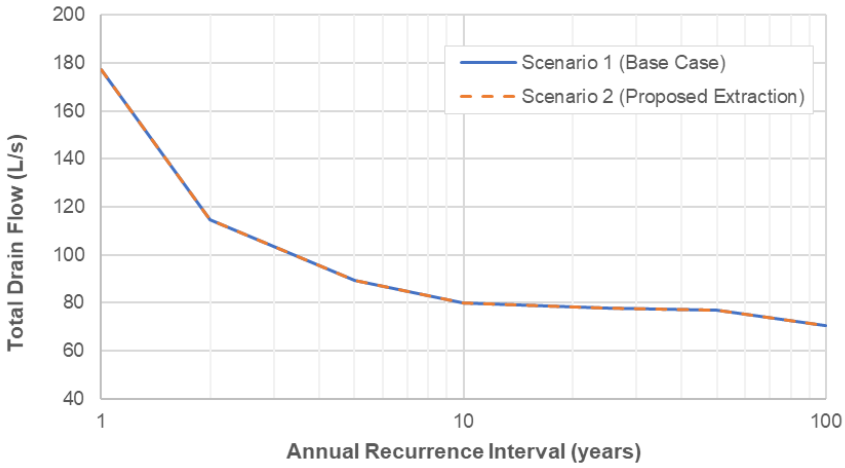


Figure 6. Surface drainage low flow analysis for model predictive scenarios.

4.2 Pumping Interference Effects

The end of the 2010 irrigation season (30 April 2010) was selected for impact analysis as this date represents the end time of the driest period within the historical record, and the greatest simulated seasonal irrigation pumping requirement. Simulation results were evaluated within and around the KSL property in order to assess potential effects from proposed pumping in the area most likely to be impacted.

Drawdown Effects

The simulated groundwater level for the end of 2010 irrigation season for Scenarios 2 and 3 were subtracted from the head simulated at the corresponding time from the Baseline Model in the case of Scenario 2, and a revised version of the Baseline Model with low permeability in Layer 2 for Scenario 3, to produce regional drawdown maps (**Figure 7** and **Figure 8**). The resulting drawdown predictions are used to evaluate the magnitude and extent of potential impacts resulting from the proposed pumping on both the shallow and deep aquifers both scenario conditions.

Deep aquifer

The predicted drawdown in the deep aquifer for Scenario 2 is shown in **Figure 7**. In Scenario 2 the maximum predicted drawdown was 0.020 m at the proposed KSL bore location. Significant drawdown is typically considered to be the 0.6 m therefore no significant drawdown was predicted as result of the proposed groundwater take under scenario 2 conditions.

In Scenario 3, the low permeability of model Layer 2 limited leakage from the overlying layers thereby magnifying the impact of pumping on groundwater levels. The maximum drawdown predicted in Scenario 3 was 0.022 m at the pumping location (**Figure 9**). As was the case with Scenario 2, no significant drawdown was predicted with the proposed ground water take under Scenario 3 conditions.

Figure 7. Simulated drawdown of deep aquifer (Scenario 2).

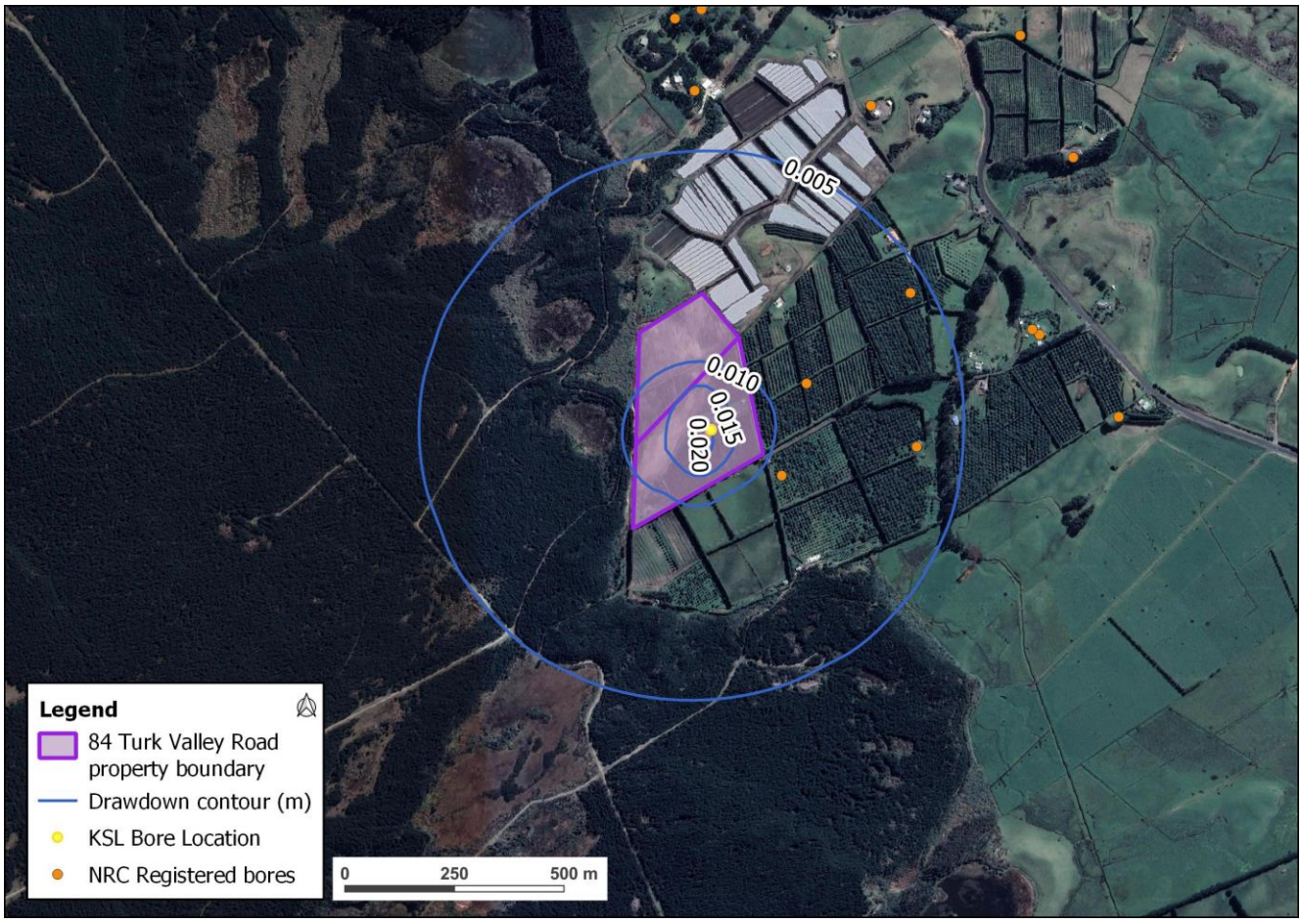


Figure 8. Simulated drawdown of deep aquifer (Scenario 3)

Shallow aquifer

The proposed groundwater take was predicted to cause negligible drawdown (0.002 m) in the shallow aquifer under Scenario 2 conditions (**Figure 9**). In Scenario 3, no shallow aquifer drawdown was predicted due to increased groundwater pumping because of the disconnection of the upper and lower portions of the aquifer.

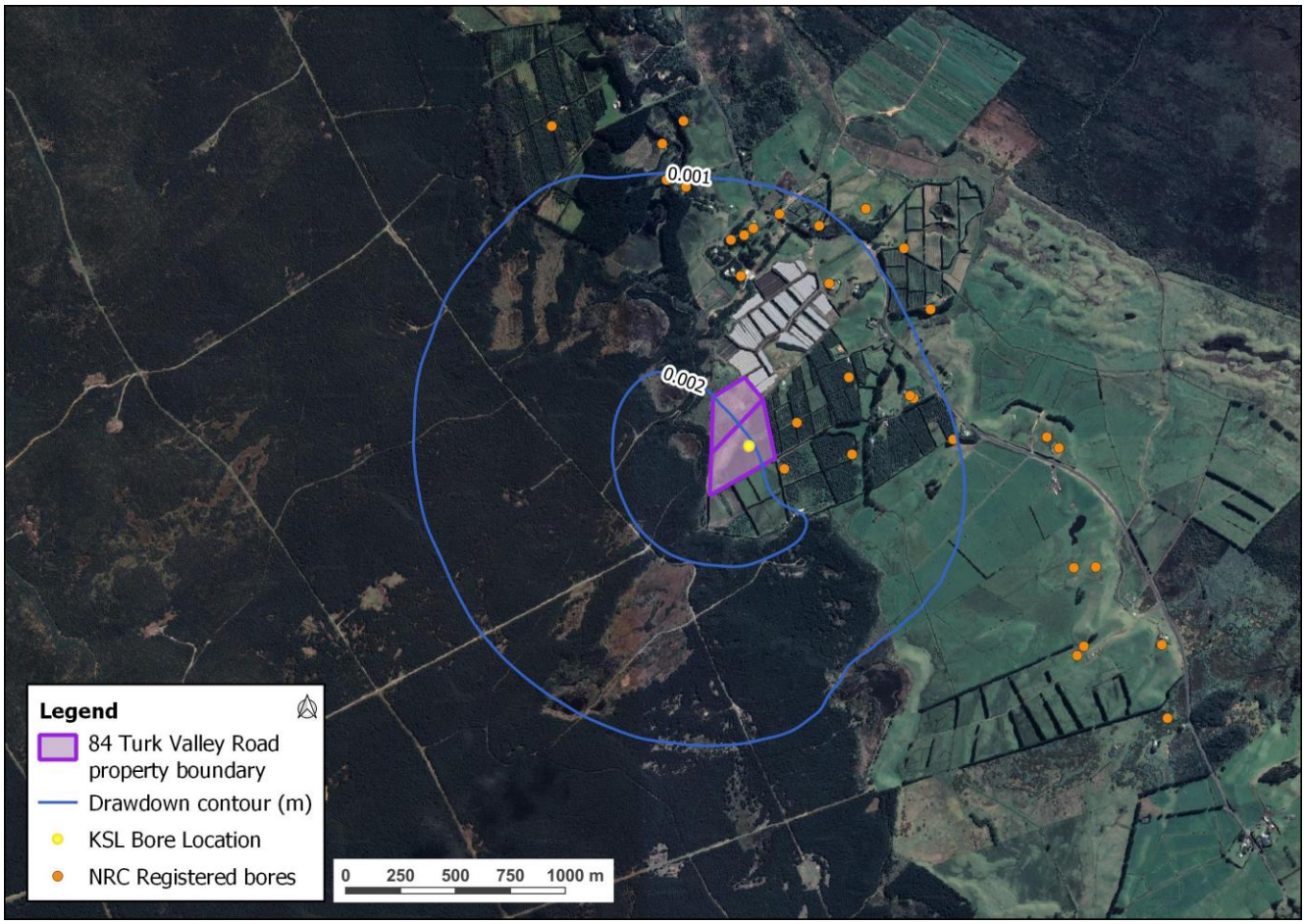


Figure 9. Simulated drawdown of shallow aquifer (Scenario 2).

Neighbouring Bores

The predicted groundwater drawdown for 30 April 2010 was used as the basis for predicting potential interference on existing groundwater users resulting from pumping at the proposed KSL bore. **Appendix B** provides a summary of predicted drawdown in Scenario 2 and Scenario 3 for bores within 2 km of the KSL bore. Scenario 3 drawdown is the greater of the two scenarios.

There are no registered bores within the area where Scenario 3 predicted drawdown is 0.6 m or greater (**Figure 8**). The maximum drawdown at a neighbouring bore predicted in Scenario 3 was 0.009 m, predicted to occur at a bore registered as LOC.200326 located approximately 250 m northeast of the KSL bore.

In all cases, predicted drawdown was insignificant in the context of available drawdown in this aquifer, which is between 70 – 100 m in most shellbed aquifer bores. Based on this assessment and the available drawdown in the aquifer the interference effects on existing groundwater users is considered less than minor.

4.3 Saline Intrusion

Model results from the Base Case (Scenario 1) and Proposed Extraction (Scenario 2) scenarios were used to evaluate the risk of the proposed groundwater takes inducing saltwater intrusion into the Aupouri aquifer. The Low Permeability Scenario (Scenario 3) was not considered for this analysis because it is not based on a

calibrated version of the model, and therefore can only be used to assess relative drawdown rather absolute water levels as required for analysis of potential saline intrusion.

The most likely mechanism for saline intrusion under the hydrogeological conditions of the study area is lateral migration. The potential for lateral migration was evaluated using the Ghyben-Herzberg relation that states that for every meter of head above sea level in the freshwater aquifer there will be 40 m of freshwater in the aquifer below sea level.

The KSL property is situated approximately 4.5 km from the east coast and approximately 6.0 from the west coast. The analysis for saline intrusion was performed for the east coast because it is closer to the KSL property and well beyond the extent of any predicted drawdown.

The bottom of the Aupouri aquifer along portion of the east coast adjacent to the KSL property is approximately -89 m AMSL. Therefore 2.2 m of head are required to prevent inland migration of the saltwater interface. In the Base Case Scenario, the predicted head along this section of coastline at the time of maximum irrigation is 2.8 m, exceeding the required head to avert saline intrusion by 0.6 m.

The maximum predicted drawdown along the east coast, adjacent to the KSL property, is less than 1 mm in the Proposed Extraction Scenario. Based on the Ghyben-Herzberg principal and the elevation of the saltwater interface this level of drawdown will not cause lateral migration of seawater into the Aupouri aquifer.

The impact on saltwater intrusion due to proposed take will therefore be less than minor.

4.4 Ground Settlement

Land subsidence due to groundwater extraction was calculated using the Bouwer (1977)[8] equation:

$$S_u = (P_{i2} - P_{i1})\frac{Z_1}{E}$$

where S_u = vertical subsidence (m)
$P_{i2} - P_{i1}$ = Increase in intergranular pressure due to drop of the water table
Z_1 = layer thickness
E = modulus of elasticity of the soil

The following characteristics were assumed for the aquifer:

- Porosity = 0.30
- Unsaturated water content = 0.08
- Specific weight of aquifer material (consolidated silty sand) = 20 kN/m^3 (Silty sand density ranges between 1,410 kg/m^3 and 2,275 kg/m^3 (http://structx.com/Soil_Properties_002.html), corresponding to specific weight of 14 kN/m^3 and 22 kN/m^3)
- Specific weight of water = 9.81 kN/m^3.

The deep shellbed material is denser and less compressible compared to the mixture of sand, silt and peat overlying above. The subsidence analysis was conducted using three separate layers representing the conceptual hydrogeological units of the sub-surface environment, and the parameter values used were based on Bouwer (1977).

The potential maximum ground settlement was estimated at the proposed bore on the KSL property based on the maximum simulated drawdown in the Base Case Scenario and low permeability scenarios. Predicted

settlement at the bore location was less than 1 mm in both Scenario 2 (Base Case) and Scenario 3 (Low Permeability). These values would be impossible to measure under existing field conditions and can therefore be considered negligible.

In summary, the potential settlement effects are considered less than minor.

4.5 Water Quality

The potential risk to water quality from the leaching of fertilisers and pesticides that may be associated with horticulture is not a relevant consideration for a water take application under the current Northland Regional planning framework. With reference to the effects from horticultural sprays the Commissioners for the MWWUG water take applications stated in their Hearing Decision Report (June 2018) that:

> "such are not matters that are directly engaged by the present applications for water abstraction. Accordingly, we have no present jurisdiction to consider those putative effects. If resource (or other) consent is subsequently required, then such will need to be applied for and considered at the appropriate time".

Nevertheless, there are a range of factors that make the leaching of fertiliser and pesticides unlikely to impact water quality:

- In practice orchardists in this area tend to apply fertiliser efficiently via fertigation as part of their irrigation water using a small dosage regularly, which is driven by both the soil conditions (i.e. high permeability and lacking in nutrients) and economic considerations.
- Inefficient irrigation practice will lead to root rot, thus because orchardists will actively avoid this, excessive leaching of nutrients is unlikely.
- Both fertiliser and approved pesticides are applied in accordance with permitted activity rules within the pRPN and rules needing to be met to become certified under the AvoGreen Assured program by the Avocado Industry Council Ltd. One of the key aims is "environmental sustainability by only using sprays when required".
- Due to the presence of significant amounts of organic matter within the shallow sand deposits, shallow groundwater is likely to be reducing. Under such conditions, nitrate concentrations are likely to be low in groundwater (consistent with available groundwater quality data) due to denitrification within the aquifer system. The presence of organic matter is also likely to substantially decrease the mobility of any pesticide compounds prone to leaching.

4.6 Consideration of Alternatives

An AEE must include a description of alternative locations or methods for undertaking an activity, if it is likely that the activity will result in any significant adverse effect on the environment.

The effects of the proposed taking and using of groundwater were assessed above as being no more than minor on the environment and less than minor on other groundwater users. As such, no alternatives have been considered for this proposal.

5. Assessment of Cultural Effects

Northland Regional Council have an internal procedure where they circulate all applications to local Iwi and Maori Groups that have registered with the Council as having an interest in the area. Therefore, regardless of whether the local Iwi or Maori Groups are considered to be affected by the effects of the proposed activity, the Group must will be notified by the Regional Council and therefore can be considered as part of the consultation process.

The applicant has not undertaken any personal consultation with Iwi or Maori Groups based on the understanding that physical effects of this application are less than minor, therefore any meta-physical (cultural and spiritual) effects would commensurately be less than minor (acknowledging cultural values are complex and effects upon them may manifest in unanticipated ways).

6. Assessment Of Statutory Considerations

Table 8 to **Table 11** provide assessments of the relevant statutory documents as were identified in **Section 0**.

Overall, this resource consent application is consistent with the objectives and policies of the National Policy Statement for Freshwater Management 2014, incumbent regional plan (RWSPN) and proposed regional plan (pRPN).

Table 8. Assessment against relevant objectives and policies for the National Policy Statement for Freshwater Management 2014.

No.	Objective / Policy	Assessment
Water Quality		
Objective A1	• Seeks to safeguard the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems of fresh water, in sustainably managing the use and development of land, and of discharges of contaminants.	This proposal is consistent with these objectives and policies and either supports them or at the least maintains them.
Objective A2	• Required that the overall quality of fresh water within a region is maintained or improved while improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated.	
Objective A4	• Seeks to enable communities to provide for their economic well-being, including productive economic opportunities.	
Policies A2, A3, and A7	• Give effect to Objectives A1, A2, A4	
Water Quality		
Objective B2	• Seeks to avoid any further over-allocation of fresh water and phase out existing over-allocation.	This proposal is consistent with these objectives and policies.
Objective B3	• Seeks to improve and maximise the efficient allocation and efficient use of water.	
Objective B5	• Seeks to provide for communities' economic wellbeing within freshwater quantity limits.	
Policies B2 to B6	• Give effect to Objectives B2 to B5.	
Integrated Management		

No.	Objective / Policy	Assessment
Objective C1	• Seeks to improve integrated management of fresh water and the use and development of land in whole catchments, including the interactions between fresh water, land, associated ecosystems and the coastal environment.	This proposal is consistent with these objective and policies.
Policies C1 and C2	• Give effect to Objective C1.	

Table 9. Assessment against relevant objectives and policies for the Regional Policy Statement for Northland.

No.	Objective / Policy	Comment
Objective 3.2	• Seeks to maintain and improve water quality for human use and ecological health.	This proposal is consistent with this objective as it will at the least maintain water quality.
Objective 3.3	• Seeks to safeguard the flows and flow variability required to maintain water's life-supporting capacity, for ecological processes, and to support indigenous species.	The proposal is consistent with this objective as it will have a no more than minor impact on surface water resources.
Objective 3.5	• Requires that the region's resources are sustainable managed in a way that is attractive for business and investment that will improve the economic wellbeing of the region and its communities.	The proposal is consistent with this objective as it will efficiently utilise a natural resource to facilitate development of economic wellbeing.
Objective 3.10	• Requires efficient use and allocation of common natural resources with a particular focus on maximising the security and reliability of supple for users.	The proposal is consistent with this objective.
Policy 4.3.2	• Requires regulatory methods to avoid over-allocation of region-wide ecological flows and water levels.	The proposal does not exceed allocation limits, hence is consistent with this policy.
Policy 4.3.3	• Requires the allocation and use of water efficiently within allocation limits.	The proposal will use water efficiently and will not exceed allocation limits, hence is consistent with this policy.

Table 10. Assessment against relevant objectives and policies for the Proposed Regional Plan for Northland.

No.	Objective / Policy	Comment
Objective F.0.1	• Seeks to manage the use, development, and protection of Northland's natural and physical resources which enables people and communities to provide for their social, economic and cultural well-being while	The proposal is consistent with this objective.

No.	Objective / Policy	Comment
	1. sustaining the natural resources to meet the reasonable foreseeable needs of future generations, 2. safeguarding life-supporting capacities of water, and 3. avoiding, remedying, or mitigating adverse effects on the environment.	
Policy D.2.2	• Requires that regard is had to the social, cultural, and economic benefits of the proposed activity when considering resource consents.	As discussed in Section 6, proposal will facilitate the economic and social benefits of both the landowner, their employees and the wider community through flow on effects of purchases made to operate and maintain the orchard.
Policy D.2.5	• Requires an authority to have regard to community and tangata whenua values	The proposal is not inconsistent with either community values, as there has been conversion to market gardening and horticulture in the area that has benefitted the community and tangata whenua through employment opportunities.
Policies D.4.5	• Seeks to maintain overall water quality	This proposal is consistent with this policy as it will not impact water quality.
Policy D.4.13	• Seeks to achieve freshwater quantity related outcomes and in particular manage the taking, use, damming, and diversion of fresh water so that (with relevance to this application) saline intrusion in, and land subsidence above, aquifers is avoided (amongst other things).	This proposal is consistent with this policy as it will avoid the saline intrusion and subsidence impacts, as discussed in **Section 4.3** and **4.4.**
Policy D.4.17	• Considers allocation limits for aquifers and requires rules and applications to meet allocation limits.	This proposal is consistent with this policy as the proposed take will not exceed allocation limits within the Aupouri-Motutangi zone.
Policy D.4.18	• Concerns conjunctive surface water and groundwater management.	This application is not inconsistent with this policy, in that the groundwater take will not adversely impact on surface water through stream depletion.
Policy D.4.20	• Requires the reasonable and efficient use of water for irrigation and sets requirements for a resource consent application to take water for irrigation purposes.	This proposal is consistent with this policy as the daily irrigation rate and annual volume are considered efficient and just meet 10-year drought requirements, but provide reduced reliability for more severe droughts.
Policy D.4.23	• Requires conditions on water permits that 1) clearly define the take amount in instantaneous take rates and total volumes, including by reference to the temporal aspects of the take and use, and	The proposal is only partially consistent with this policy, as the applicants are arguing that so long as pumping data is recorded electronically and available for the council upon

No.	Objective / Policy	Comment
	2) require that the water take is metered and information on rates and total volume of the take is provided electronically to the regional council, and 3) for water permits for takes equal to or greater than 10 litres per second, require the water meter to be telemetered to the regional council, and 4) clearly define when any restrictions and cessation of the water take must occur to ensure compliance with freshwater water quantity limits set in this plan, and 5) require the use of a backflow prevention system to prevent the backflow of contaminants to surface water or ground water from irrigation systems used to apply animal effluent, agrichemical or nutrients, and 6) specify when and under what circumstances the permit will be reviewed pursuant to Section 128(1) of the RMA, including by way of a common review date with other water permits in a catchment.	request, telemetry is not required. All other provisions will be met.

Table 11. Assessment against relevant objectives and policies for the Regional Water and Soil Plan for Northland.

No.	Objective / Policy	Comment
Objective 7.4	• Requires the maintenance or enhancement of water quality of natural water bodies.	This proposal is consistent with this objective as the effects of the take and use of the water will have no more than minor impacts on the shallow aquifer and other surface water bodies, as discussed in **Sections 4.1** and **4.2**
Objective 10.4.1	• Seeks to maintain the sustainable use and development of the region's groundwater resources while avoiding, remedying, or mitigating actual and potential adverse effects on groundwater quantity and quality.	Ditto above.
Policy 10.5.1	• Seeks to ensure the sustainable use of resources by avoiding takes that exceed recharge. Saltwater intrusion, reduced groundwater quality, significant drawdown, and adverse effects on surface water resources can arise where takes exceed recharge.	This proposal is consistent with this policy as the cumulative allocation in this aquifer management zone is only 11% of mean annual recharge, which is a low limit on a national scale.
Policy 10.5.2	• Recognises that aquifers are at risk in certain circumstances and that adverse effects on water quality should be avoided.	This proposal is consistent with this policy in that current water quality will be maintained.
Policy 10.5.4	• Seeks that groundwater allocations take into account reduction in recharge that may occur in time.	This proposal is consistent with this policy in that the analysis assumed no rainfall for the entire 96 days of pumping.

No.	Objective / Policy	Comment
Policy 10.5.7	• Requires the Northland Regional Council to consider effects of a groundwater take and use on surface water bodies.	This proposal is consistent with this policy as the effects of the take and use of the water will have no more than minor impacts on the shallow aquifer and other surface water bodies, as discussed in **Section** Error! Reference source not found..
Policy 10.5.9	• Seeks to avoid, remedy or mitigate any ground subsidence as a result of groundwater takes, use or diversion, where this is likely to cause adverse flooding, drainage problems, or building damage.	This proposal is consistent with this policy as subsidence effects will be no more than minor in the context of a rural setting, as discussed in **Section 4.4**.

7. Notification

Section 95 sets out the decision-making steps for the determining of public notification and limited notification of applications and the timeframe Councils have for making the notification decision.

A notification assessment has been carried out in accordance with the stepped process as documented in **Table 12**.

Table 12. RMA Section 95A public notification of consent applications assessment.

Step	Question	Assessment
Step 1: mandatory public notification in certain circumstances	a) The applicant has requested that the application be publicly notified	NO
	b) Public notification is required under section 95C	NO
	c) The application is made jointly with an application to exchange recreation reserve land under section 15AA of the Reserves Act 1977	NO
Step 2: if not required by step 1, public notification precluded in certain circumstances	a) The application is for a resource consent for 1 or more activities, and each activity is subject to a rule or national environmental standard that precludes public notification.	NO
	b) The application is for a resource consent for 1 or more of the following, but no other, activities: (i) a controlled activity; (ii) a restricted discretionary or discretionary activity, but only if the activity is a subdivision of land or a residential activity; (iii) a restricted discretionary, discretionary, or non-complying activity, but only if the activity is a boundary activity; (iv) a prescribed activity (see section 360H(1)(a)(i)).	NO
Step 3: if not precluded by step 2, public notification required in certain circumstances	a) The application is for a resource consent for 1 or more activities, and any of those activities is subject to a rule or national environmental standard that requires public notification.	NO
	b) The consent authority decides, in accordance with section 95D, that the activity will have or is likely to have adverse effects on the environment that are more than minor.	NO
Step 4: public notification in special circumstances	Determine whether special circumstances exist in relation to the application that warrant the application being publicly notified.	NO

Therefore, in accordance with s95A(9)(b) RMA, the consent authority should not publicly notify this application but may determine whether to give limited notification under s95B.

8. Consultation

Schedule 4 of the RMA requires that an AEE should identify (amongst other things) the persons affected by the activity, any consultation undertaken, and any response to the views of any person consulted.

Potentially affected parties in relation to this application could include other groundwater users and occupiers of the land within the pumping induced groundwater cone of depression.

However, it should also be noted that while it is considered good practice and “neighbourly” to undertake consultation, under Section 36A of the RMA there is no requirement for an applicant or council to undertake any consultation with any person in regard to an application.

Written approval has been obtained from seven land owners adjacent to the KSL property. Copies of these documents are provided in **Appendix C**. Additional consultation has not been undertaken with other water users and landowners because the assessment of effects and in particular the bore interference assessment provided in **Section 4.2** concludes that no other groundwater users are considered to be adversely affected by the granting of this application.

9. Summary and Conclusions

KSL Limited are seeking to increase an existing groundwater take to facilitate the development of a 10-ha orchard on a property located at 84 Turk Valley Road, Motutangi. The current groundwater take, AUT.039628.01.02, is for 26,400 m^3/year and 160 m^3/day. The increased volume being sought is intended to bring the irrigation capacity for the property up to the industry standard of 25 m^3/ha/day of total orchard area and 400 mm/ha/year of total canopy area. The new groundwater take being sought in this application will be exercised from October to April, in accordance with the following volumes:

- Maximum daily volume of 90 m^3/day; and
- Maximum annual volume of 3,600 m^3/yr.

A consent duration of 30 years is sought, subject to a lapse period of 5 years.

If granted, this consent taken with another application we are aware of, will take the allocation status for the Aupouri-Motutangi allocation zone to just approximately 61% of full allocation. The activity status thus remains Discretionary.

The AEE has demonstrated that the potential adverse effects of the proposed water take and use on the environment will be less than minor, and the effects on persons will also be less than minor.

The proposal is also considered to be consistent with the relevant objectives and policies of the NPS, the RPS, the PRP, the RWSPN, and Part 2 of the RMA. The applicant considers that in light of the less than minor effects of the application, the decision made following the recent hearing for the MWWUG consent applications, the consent should proceed without public notification and be granted on a non-notified basis.

10. References

Lincoln AgriTech, 2015. Aupouri Aquifer Groundwater Model. Consultancy report prepared for Northland Regional Council.

Tait, B., 2018. Allocation and use of water. Recommendations in response to submissions on the Proposed Regional Plan for Northland - Section 42A hearing report. Date: 3/07/2018. Author: Ben Tait. Version: Final.

Williamson Water Advisory, 2017. Motutangi-Waiharara Groundwater Model Factual Technical Report – Modelling. Consultancy report prepared for Motutangi-Waiharara Water Users Group.

Williamson Water & Land Advisory (2019). Aupouri Aquifer Groundwater Model-Factual Technical Report. Consultancy report prepared for interested parties and the public.

Appendix A. Form A - Application for Resource Consent

APPLICATION FORM FOR RESOURCE CONSENT

NORTHLAND REGIONAL COUNCIL

Putting Northland first

Whāngārei Office	Phone:	(09) 470 1200
	Fax:	(09) 470 1202
Kaitāia Office	Phone:	(09) 408 6600
Ōpua Office	Phone:	(09) 402 7516
Dargaville Office	Phone:	(09) 439 3300
Free Phone		0800 002 004
E-mail		mailroom@nrc.govt.nz
Website		www.nrc.govt.nz

This application is made under Section 88/127 of the Resource Management Act 1991

To: Consents Department
Northland Regional Council
Private Bag 9021
Whāngārei Mail Centre
Whāngārei 0148

IMPORTANT NOTES TO APPLICANTS

(a) Please read fully the notes below and the Information Brochures and Explanatory Notes available from the Council, before preparing your application and any supporting information.

(b) The Resource Management Act 1991 sets out the information you must provide with your application for a resource consent. If you do not provide adequate information, your application cannot be received nor processed by the Council and will be returned to you. If you are unsure of what information should be included with your application, please contact the Council before submitting the application.

(c) Applications require notification (public advertising calling for submissions) unless the Council is satisfied that the adverse effects on the environment of the activity for which consent is sought will be minor; and written approval has been obtained from every person who the Council is satisfied may be adversely affected by the granting of the consent. The Council also has available a form "Form 8A – Affected Person's Written Approval", to help you record such approvals for applications that may be processed without public notification.

PART A – GENERAL

APPLICANT	Full Names	
(1) Full Name of Applicant(s): (in full e.g. Albert William Jones and Mary Anne Jones. For Companies, Trusts and other Organisations, commonly used name)	KSL Limited	
Phone Number – Business:	Fax:	
Home:	09 406 8867	Mobile: 027 574 0114
E-mail:	sherylshine63@gmail.com	

For applications by a company, private trusts or other entity/organisations, the Directors; Trustees and Officers' full names must be supplied and Section (12) completed and signed.

(2) Postal Address: (in full)	231 Kaimaumau Road
	RD1
	Awanui
	0486

(3) Residential Address: (if different from postal address)	231 Kaimaumau Road
	Waiharara
	Far North

Application Form continued on next page

(4) Address for Service of Documents: (if different from postal address e.g. Consultant)	Jon Williamson (jon.williamson@wwa.kiwi) c/o Williamson Water & Land Advisory PO Box 314 Kumeu, 0812 Auckland

(5) Owner/Occupier of Land/ Water Body: (if different from the Applicant)	N/a

(6) Type(s) of Resource Consent sought from the Regional Council:

You will need to fill in a separate Assessment of Environmental Effects Form for each activity.
These forms can be obtained from the Northland Regional Council.

Coastal Permit

☐ Mooring ☐ Marine Farm ☐ Structure ☐ Pipeline/Cable

☐ Other (specify)_____

Land Use Consent

☐ Vegetation Clearance ☐ Quarry ☐ Structure in/over Watercourse

☐ Earthworks ☐ Construct/Alter a Bore ☐ Dam Structure

☐ Other (specify)_____

Water Permit

☐ Stream/Surface Take ☐ Damming ☒ Groundwater Take ☐ Diverting Water

☐ Other (specify)_____

Discharge Permit

☐ Domestic Effluent to Land ☐ General Discharge to Land ☐ Farm Dairy Effluent to Land/Water

☐ Air ☐ Water

☐ Other (specify)_____

(7) Other Resource Consents required from the District Council:

Where other Resource Consents are required for the same activity, they must be applied for at the same time.
Not doing so will delay the processing of this application.

What other Resource Consents are required from the District Council?

☐ None ☐ Land Use Consent ☐ Subdivision Consent

Have the applications been made? ☐ Yes ☐ No

(8) Description of the Activity:

Please briefly describe the activities and duration for which Consent(s) are being sought. It is important you fill this out correctly, as the Council cannot grant Consent for any activity you do not apply for.

The resource consent application for KSL is to take and use groundwater for a 10 ha orchard, using an existing bore registered in the NRC database as LOC.209585. This will comprise an increase of an existing consent for 160 m³/d and 26,400 m³/yr (AUT.039628.01.02).

The additional groundwater take will be exercised from October to April, in accordance with the following volumes:

- Maximum daily volume of 90 m³/day; and
- Maximum annual volume of 3,600 m³/yr.

The increased water take will bring the irrigation capacity for the orchard up to the industry standard as described in the accompanying AEE

Application Form continued on next page

(9) Location of Property/Waterbody to which Application relates:

Describe the location in a manner which will allow it to be readily identified, e.g. street address, legal description, harbour, bay, map reference etc. Attach appropriate plans and/or diagrams.

Property Address: (see rate demand) 84 Turk Valley Rd, Motutangi 0484 Locality: Motutangi 1614333E 6138477N

Legal Description: Lot 1 DP 344086 and Lot 4 DP 178824 Blk: SD:

Other Location Information:

PART B – ASSESSMENT OF EFFECTS ON THE ENVIRONMENT

You must include an assessment of the effects of your activity on the environment as part of your application.

The Resource Management Act 1991 requires that each application include an assessment of the actual and potential effects of the activity on the environment in accordance with the Fourth Schedule.

To assist you to supply this assessment of effects, the Council has prepared specific forms for various consent activities. For minor activities, all that will be required is for you to complete the specific form. Where the potential effects of the activity are more significant, we recommend you undertake a full assessment of effects, with professional assistance if necessary.

If you are unsure of what information to include with you application and the assessment of effects, please contact the Council before submitting your application. A pre-lodgement meeting with relevant Consent Staff is recommended.

PART C – GENERAL

(10) Renewal of an Existing Resource Consent:

☐ Yes ☐ No ☒ A change in conditions of a current Resource Consent

(11) Fee/Deposit Enclosed with Application(s):

Application to be processed as: ☐ Notified ☐ Limited Notified ☒ Non-notified

☐ Coastal Permit: $ ☐ Land Use Consent: $

☒ Water Permit: $ 896.50 ☐ Discharge Permit: $

☐ Bore Permit: $ ☐ Change Conditions: $

(12) Signature of Applicant(s) or Persons authorised to sign on behalf of Applicant(s):

IMPORTANT NOTES TO APPLICANTS

(a) Your application must be accompanied by the minimum fee (deposit) as determined by the Council. A schedule of the fee/deposits for different consent applications is annexed. Please note that applications by private trusts and other group entities require the personal guarantees of the Trustees and/or Officers for the payment of costs to be submitted with the application.

- For complex applications, the Council may require an additional deposit pursuant to Section 36(3) of the Act, based on the estimated costs for processing such complex applications and may require progressive monthly payments during consent processing.
- The final fee is based on actual and reasonable costs including disbursements and where this fee exceeds the fee/deposit, the additional fee is subject to objection and appeal.

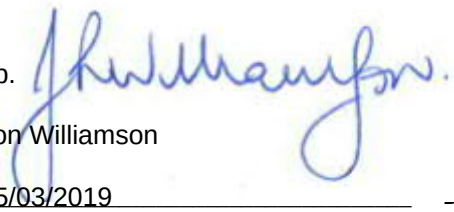
(b) All accounts are payable by the 20th of the month following the date of invoice. Any actual and reasonable costs, including but not limited to legal costs, debt collection fees or disbursements incurred as a result of any default in payment, shall be recoverable from the Applicant and is so notified in compliance with the Credit Contracts and Finance Act 2003. Submitting this Application authorises the Council to, if necessary, provide your personal information to a Credit Reporter in order to employ in its debt collection services in compliance with the Credit Reporting Privacy Code 2004, should payment default occur.

(c) Resource Consents usually attract an annual fee to recover the reasonable costs of the Council's monitoring, supervision and administration of the Consent during its term.

(d) The information you provide is official information. It will be used to process the application and, together with other official information, assist the management of the region's natural and physical resources. Access to information held by the Northland Regional Council is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993.

Application Form continued on next page

I/we declare that, to the best of my/our knowledge and belief, the information given in this Application and attached Assessment of Environmental Effects is true and correct. I/we unconditionally guarantee jointly and severally to pay the actual and reasonable costs of processing this Application as and when charges become due and payable. I/we acknowledge that I/we understand the consequences of sig

Signature: pp.  **ignature:** _____

Full Name (print): Jon Williamson **ull Name** (print):_____

Date: 25/03/2019 **ate:** _____

Continue with Trustees' and Authorised Officers' signatures below, as necessary.

Personal details and signatures of Trustees*, or Officers authorised to sign on behalf of and to bind Trusts, Societies and Unincorporated Entities. *** Private and Family Trusts only**	
Full Name and Status: (Trustee, Officer etc)	
Full Residential Address:	
Signature:	
Full Name and Status: (Trustee, Officer etc)	
Full Residential Address:	
Signature:	
Full Name and Status: (Trustee, Officer etc)	
Full Residential Address:	
Signature:	
Full Name and Status: (Trustee, Officer etc)	
Full Residential Address:	
Signature:	

CHECKLIST – Have you remembered to…

- ☐ Complete all details set out in this Application Form
- ☐ Include an Assessment of Effects of the activity on the environment, set out in the attached form
- ☐ Sign and date the Application Form
- ☐ Include a Site Plan
- ☐ Include the appropriate fee as set out in the *"Schedule of Minimum Estimated Initial Fees"*
- ☐ Complete details of Trustees and/or Authorised Officers on this page

Appendix B. Impact on Neighbouring bores

Predicted drawdown on bores over 50 m deep that are included in the NRC database:

IRISID	X	Y	Purpose	Depth of Bore (m)	Scenario 3 Drawdown: Deep Aquifer (m)
LOC.200326	1614554	6138575	Irrigation	116	0.009
LOC.200341	1614490	6138367	Irrigation	89	0.008
LOC.209284	1614800	6138422	Irrigation	90	0.006
LOC.209280	1614798	6138773	Irrigation	89	0.005
LOC.319221	1614322	6139251	Not Specified	Not Specified	0.005
LOC.210378	1614723	6139203	Domestic	90	0.004
LOC.200331	1615089	6138668	Irrigation	87	0.004
LOC.210299	1615073	6138680	Domestic and Irrigation	90	0.004
LOC.210374	1614344	6139436	Domestic and stock	114	0.004
LOC.300999	1614283	6139417	Domestic and stock	120	0.004
LOC.200239	1614387	6139466	Stock	73	0.004
LOC.200159	1614687	6139467	Stock	46	0.004
LOC.314463	1614508	6139527	Stock	110	0.004
LOC.209326	1615263	6138474	Stock and Irrigation	107	0.004
LOC.209647	1615180	6139069	Domestic and Irrigation	97	0.004
LOC.200328	1614087	6139665	Irrigation	88	0.004
LOC.312665	1615069	6139351	Domestic	96	0.003
LOC.209031	1614902	6139537	Domestic and Stock	115	0.003
LOC.201034	1614000	6139700	Irrigation	26	0.003
LOC.200321	1613986	6139865	Not Specified	117	0.003
LOC.200190	1614086	6139965	Stock	76	0.003
LOC.200197	1615742	6138418	Stock	96	0.003
LOC.200069	1615689	6138470	Not Specified	10	0.003
LOC.200292	1613486	6139963	Not Specified	117	0.003
LOC.200071	1615791	6137871	Not Specified	14	0.003
LOC.200072	1615891	6137871	Not Specified	6	0.003
LOC.209495	1615824	6137512	Stock and Irrigation	86	0.002
LOC.201512	1615792	6137471	Domestic and Stock	78	0.002

Appendix C. Affected Persons Written Approval

FORM 8A
AFFECTED PERSON'S WRITTEN APPROVAL
(Section 95E(3)(a)/95F(c) of the Resource Management Act 1991)

TO: Northland Regional Council

Full name of person giving written approval: Neil Thompson

I am the owner / occupier *(delete one)* **of the property located at:** TURK VALLEY ROAD, MOTUTANGI
(Give address of property)

I have authority to sign on behalf of all the other owners / occupiers *(select one)* of the above property. **Note**: If you are signing on behalf of a trust or company, please provide additional written evidence that you have signing authority.

This is written approval to the following activity that is subject of a resource consent application:

Applicant's Name: KSL LIMITED

Application Number *(if known)*:

Description of Proposal: TO TAKE AN EXTRA 90 CUBIC METERS PER DAY FOR IRRIGATING OUR AVOCADO ORCHARD

Location: 84 TURK VALLEY ROAD, MOTUTANGI

I have read the full application for resource consent, the Assessment of Environmental Effects (AEE), and any site plans as follows:

Document name and date: AEE AND SITE PLAN

Plan number(s) and date(s): 08/06/2018

In signing this written approval, I understand that the Northland Regional Council must decide that I am no longer an affected person, and the Northland Regional Council must not have regard to any adverse effects on me.

I understand that I may withdraw my written approval by giving written notice to the Northland Regional Council before the hearing, if there is one, or, if there is not, before the application is determined.

Signature of person giving written approval*
(or person authorised to sign on behalf of person giving written approval)

8 . 6 . 18
Date

Address for service of person giving written approval: 38 TURK VALLEY ROAD, MOTUTANGI

Telephone: 09 4068598

Fax/Email: motutangi@xtra.co.nz

Contact person: *(name and designation, if applicable)* NEIL THOMPSON

** A signature is not required if you give your written approval by electronic means.*

AFFECTED PERSONS WRITTEN APPROVAL FORM OCTOBER 2013 (REVISION 5)

FORM 8A
AFFECTED PERSON'S WRITTEN APPROVAL
(Section 95E(3)(a)/95F(c) of the Resource Management Act 1991)

TO: Northland Regional Council

Full name of person giving written approval: Malcolm Bellette

I am the owner / occupier *(delete one)* **of the property located at:** 101 TURK VALLEY ROAD, MOTUTANGI
(Give address of property)

I have authority to sign on behalf of all the other owners / occupiers *(select one)* of the above property. **Note**: If you are signing on behalf of a trust or company, please provide additional written evidence that you have signing authority.

This is written approval to the following activity that is subject of a resource consent application:

Applicant's Name: KSL LIMITED

Application Number ***(if known)*****:**

Description of Proposal: TO TAKE AN EXTRA 90 CUBIC METERS PER DAY FOR IRRIGATING OUR AVOCADO ORCHARD

Location: 84 TURK VALLEY ROAD, MOTUTANGI

I have read the full application for resource consent, the Assessment of Environmental Effects (AEE), and any site plans as follows:

Document name and date: AEE AND SITE PLAN

Plan number(s) and date(s): 08/06/2018

In signing this written approval, I understand that the Northland Regional Council must decide that I am no longer an affected person, and the Northland Regional Council must not have regard to any adverse effects on me.

I understand that I may withdraw my written approval by giving written notice to the Northland Regional Council before the hearing, if there is one, or, if there is not, before the application is determined.

M Bellette.
Signature of person giving written approval*
(or person authorised to sign on behalf of person giving written approval)

8/6/2018
Date

Address for service of person giving written approval: Malcolm BELLETTE

Telephone: 09- 406-8551

Fax/Email: bellettelm@gmail.com

Contact person:
(name and designation, if applicable) Malcolm

** A signature is not required if you give your written approval by electronic means.*

AFFECTED PERSONS WRITTEN APPROVAL FORM OCTOBER 2013 (REVISION 5)

FORM 8A
AFFECTED PERSON'S WRITTEN APPROVAL
(Section 95E(3)(a)/95F(c) of the Resource Management Act 1991)

TO: Northland Regional Council

Full name of person giving written approval: Jonathan Anders Jacobsen

I am the owner / occupier *(delete one)* **of the property located at:** 65 TURK VALLEY ROAD, MOTUTANGI
(Give address of property)

I have authority to sign on behalf of all the other owners / occupiers *(select one)* of the above property. **Note:** If you are signing on behalf of a trust or company, please provide additional written evidence that you have signing authority.

This is written approval to the following activity that is subject of a resource consent application:

Applicant's Name: KSL LIMITED

Application Number ***(if known)***:

Description of Proposal: TO TAKE AN EXTRA 90 CUBIC METERS PER DAY FOR IRRIGATING OUR AVOCADO ORCHARD

Location: 84 TURK VALLEY ROAD, MOTUTANGI

I have read the full application for resource consent, the Assessment of Environmental Effects (AEE), and any site plans as follows:

Document name and date: AEE AND SITE PLAN

Plan number(s) and date(s): 08/06/2018

In signing this written approval, I understand that the Northland Regional Council must decide that I am no longer an affected person, and the Northland Regional Council must not have regard to any adverse effects on me.

I understand that I may withdraw my written approval by giving written notice to the Northland Regional Council before the hearing, if there is one, or, if there is not, before the application is determined.

JAJacobsen
Signature of person giving written approval*
(or person authorised to sign on behalf of person giving written approval)

12/06/18
Date

Address for service of person giving written approval: P.O. Box 151, Mangonui 0442

Telephone: 0940600280

Fax/Email: jake@jravocados.co.nz

Contact person: *(name and designation, if applicable)* Jonathan Anders Jacobsen

** A signature is not required if you give your written approval by electronic means.*

AFFECTED PERSONS WRITTEN APPROVAL FORM OCTOBER 2013 (REVISION 5)

FORM 8A
AFFECTED PERSON'S WRITTEN APPROVAL
(Section 95E(3)(a)/95F(c) of the Resource Management Act 1991)

TO: Northland Regional Council

Full name of person giving written approval: Alan Anderson

I am the owner / occupier *(delete one)* **of the property located at:** 27 TURK VALLEY ROAD, MOTUTANGI
(Give address of property)

I have authority to sign on behalf of all the other owners / occupiers *(select one)* of the above property. **Note**: If you are signing on behalf of a trust or company, please provide additional written evidence that you have signing authority.

This is written approval to the following activity that is subject of a resource consent application:

Applicant's Name: KSL LIMITED

Application Number ***(if known)*****:**

Description of Proposal: TO TAKE AN EXTRA 90 CUBIC METERS PER DAY FOR IRRIGATING OUR AVOCADO ORCHARD

Location: 84 TURK VALLEY ROAD, MOTUTANGI

I have read the full application for resource consent, the Assessment of Environmental Effects (AEE), and any site plans as follows:

Document name and date: AEE AND SITE PLAN

Plan number(s) and date(s): 08/06/2018

In signing this written approval, I understand that the Northland Regional Council must decide that I am no longer an affected person, and the Northland Regional Council must not have regard to any adverse effects on me.

I understand that I may withdraw my written approval by giving written notice to the Northland Regional Council before the hearing, if there is one, or, if there is not, before the application is determined.

Signature of person giving written approval*
(or person authorised to sign on behalf of person giving written approval)

10/06/18
Date

Address for service of person giving written approval: 27 Turk Valley Rd

Telephone: 0273195268

Fax/Email: Cypressh illsLimited@Gmail.com

Contact person:
(name and designation, if applicable) Alan Anderson

** A signature is not required if you give your written approval by electronic means.*

AFFECTED PERSONS WRITTEN APPROVAL FORM OCTOBER 2013 (REVISION 5)

[redacted]

TO: Northland Regional Council

Full name of person giving written approval: Keith Douglas Paterson , Director, Avokaha Ltd
Alistair Nicholson, Director, Avokaha Ltd

I am the owner / occupier *(delete one)* of the property located at: 70 TURK VALLEY ROAD, MOTUTANGI
(Give address of property)

I have authority to sign on behalf of all the other owners / occupiers *(select one)* of the above property. **Note**: If you are signing on behalf of a trust or company, please provide additional written evidence that you have signing authority.

This is written approval to the following activity that is subject of a resource consent application:

Applicant's Name: KSL LIMITED

Application Number *(if known)*:

Description of Proposal: TO TAKE AN EXTRA 90 CUBIC METERS PER DAY FOR IRRIGATING OUR AVOCADO ORCHARD

Location: 84 TURK VALLEY ROAD, MOTUTANGI

I have read the full application for resource consent, the Assessment of Environmental Effects (AEE), and any site plans as follows:

Document name and date: AEE AND SITE PLAN

Plan number(s) and date(s): 08/06/2018

In signing this written approval, I understand that the Northland Regional Council must decide that I am no longer an affected person, and the Northland Regional Council must not have regard to any adverse effects on me.

I understand that I may withdraw my written approval by giving written notice to the Northland Regional

Council before the hearing, if there is one, or, if there is not, before the application is determined.

I Williamson 6/6/18 / 9/6/18

Signature of person giving written approval (or person authorised to sign on behalf of person giving written approval)* / *Date*

Address for service of person giving written approval: 144 SLOPEHILL RD RD1 Queenstown 9371 / 70 Tuark Valley Rd Motutangi

Telephone: 021 946 391

Fax/Email: alistair.j.nicholson@gmail.com.

Contact person: *(name and designation, if applicable)* Alistair Nicholson

** A signature is not required if you give your written approval by electronic means.*

NOTES: (1) There is no obligation for you to sign this form and no reasons need to be given. Therefore, if you do not understand what this form is, or details about the application, then **DO NOT SIGN IT**.

(2) Conditional written approvals cannot be accepted.

(3) If this form is not signed, the application may need to be notified with an opportunity for submissions.

AFFECTED PERSONS WRITTEN APPROVAL FORM OCTOBER 2013 (REVISION 5)

GUIDELINES FOR AFFECTED PERSONS REQUEST FOR WRITTEN APPROVAL

Why is your written approval being sought?

If you have been asked to sign this form, it will be because someone is proposing an activity that requires a resource consent and you have been identified as a potentially affected person.

For a resource consent application to be processed without notification the applicant needs to:

1. Show that the proposed activity has no more than minor effects on the environment; and

2. Obtain the written approval of any person that the Council considers may be adversely affected.

FORM 8A
AFFECTED PERSON'S WRITTEN APPROVAL
(Section 95E(3)(a)/95F(c) of the Resource Management Act 1991)

TO: Northland Regional Council

Full name of person giving written approval: Logan King

I am the owner / occupier *(delete one)* **of the property located at:** 3167 Far North Rd RD4 Kaitaia

(Give address of property)

I have authority to sign on behalf of all the other owners / occupiers *(select one)* of the above property. **Note**: If you are signing on behalf of a trust or company, please provide additional written evidence that you have signing authority.

This is written approval to the following activity that is subject of a resource consent application:

Applicant's Name: KSL LIMITED

Application Number ***(if known)***:

Description of Proposal: TO TAKE AN EXTRA 90 CUBIC METERS PER DAY FOR IRRIGATING OUR AVOCADO ORCHARD

Location: 84 TURK VALLEY ROAD, MOTUTANGI

I have read the full application for resource consent, the Assessment of Environmental Effects (AEE), and any site plans as follows:

Document name and date: AEE AND SITE PLAN

Plan number(s) and date(s): 08/06/2018

In signing this written approval, I understand that the Northland Regional Council must decide that I am no longer an affected person, and the Northland Regional Council must not have regard to any adverse effects on me.

I understand that I may withdraw my written approval by giving written notice to the Northland Regional Council before the hearing, if there is one, or, if there is not, before the application is determined.

Signature of person giving written approval*
(or person authorised to sign on behalf of person giving written approval)

Date

Address for service of person giving written approval: 323 SH1 RD 2 Kaitaia.

Telephone: 0274988125

Fax/Email: elburyextra.co.nz

Contact person:
(name and designation, if applicable) Logan King

** A signature is not required if you give your written approval by electronic means.*

AFFECTED PERSONS WRITTEN APPROVAL FORM OCTOBER 2013 (REVISION 5)