

Ashburton District Council
C/- Stewart Fletcher
Consultant Planner

Via email: stewart.fletcher@adc.govt.nz

26th August 2025

Dear Stewart,

RE: ADDITIONAL PLANNING INFORMATION – MIDLANDS PROPERTIES LIMITED – LUC25/0001 RACECOURSE ROAD ASHBURTON

In addition to the resource consent application please see below additional supporting information post lodgement following our meeting and discussion.

The questions asked are in italics.

Infrastructure

- *Further consideration could be given to the question of stormwater management. This could include the location of stormwater ponds particularly if sealed car parking is proposed. Consideration could also be given to alternative forms of car park surface.*

Please see the summary prepared by E2 Environmental dated 18th August 2025. This is included as Annexure A. This summary details the stormwater management for the site. It includes some groundwater analysis and water usage calculations. A resource consent will be sought for operational phase stormwater discharge to land from Environment Canterbury.

- *It is envisaged that effluent will be able to be disposed of on-site, but it could be worthwhile providing further documentation around this such as systems available, or likely system choice, and the location of the disposal field (including the location being marked on the plans. This may be of interest to neighbours on the basis that they may have water wells and wish to ensure there is no risk for them.*

Please see the summary prepared by E2 Environmental. This is included as Annexure A. The discharge on-site wastewater will meet the permitted activity criteria under the Canterbury Regional Plan.

- *It has been previously detailed that on site water is available. The location of the well ties in with the question of location of effluent disposal but it is worthwhile going into more detail to ensure there is confidence of supply.*

Please see the memorandum prepared by Aqualinc included as Annexure B. This details the requirements for the water supply for the new office and administration facilities.

Consideration could also be given to the question of water tanks particularly as it's not unusual for FENZ to ensure adequate water for firefighting is available.

Please see the attached response from FENZ. This is included as Annexure C. Essentially on-site storage of 30 000 litres required with appropriate attachments, siting, and access for the tank. Alongside this this is a flowing water supply on Racecourse Road available for use if required.

Transport

- *It is likely that questions will be asked regarding direct access to the State Highway. Further clarity could be provided regarding this.*

There is no direct access to the State Highway for this application. There are two access points proposed off Racecourse Road that will meet the sight visibility and intersection setbacks.

- *Further consideration should be given to the design of the vehicle crossings from Racecourse Road. In particular the main access could be enabling a more significant number of vehicle movements each day such that some form of access widening would appear logical.*

A design of this vehicle crossing off Racecourse Road has been prepared and is included as Annexure D.

The applicant has undertaken direct consultation with the Van Polanens, (submitters to this application) on the very issue of the vehicle crossing formation and location.

Other Buildings

- *The application refers to the erection of other buildings on site and the notification assessment includes provision for this, but resource consent is already required based on an exceedance of site coverage and it is doubtful that a decision could be issued that enables the erection of unknown buildings.*

Please see attached a plan showing two future building platforms (Numbered 19) to be used for machinery close to boundary on Racecourse Road. These would be buildings up to 250m² each in floor area. A copy of that plan showing the additional buildings is included as Annexure E.

Boundary Treatment

- *As per above, questions will arise regarding the provision of access to the State Highway. This is likely to include landscaping and potentially questions of frost/ice from the shading of any landscaping.*

The applicant has reduced the size of the existing boundary trees along both Racecourse Road and State Highway 77, so potential for frost and ice issues is reduced. The frost risk was at its maximum just prior to Midlands purchasing the property and note that the trees are an existing situation and have been for many years. Note that the sunrise and movement between the hours of 10am-2pm is not screened by the trees i.e. the sun is on the open side of Racecourse Road and partially on State Highway 1 as it moves from east to west.

- *Nearer the eastern boundary of the site is a car parking area. Further consideration could be given to managing the relationship between the proposed activity and effects on the property to the east. This could include landscaping but also, to manage potential conflicts in the future,*

one could think about how to manage noise effects from the sound of vehicles in the parking area, including doors opening and closing.

The earth from creating driveways and foundations for buildings may be placed along that boundary with Briggs or elsewhere on site as required, however please note that this neighbour (Briggs – 373 Racecourse Road) has provided a supporting submission to this application as notified.

- *It is likely that neighbours on the opposite sides of the road will have an interest in the details of landscaping and bunding.*

This opposite landowner did submit on the application however this was in relation to vehicle movements and the position of the vehicle crossing or access to the site. There is already established planting on the boundary to provide some mitigation.

- *It should be ensured that the landscaping information provided is adequate to provide certainty as to managing effects on the amenity of the area and neighbours.*

We have a full landscape design and plan prepared by RMM Landscape Architects. The proposed detail in the landscaping design is more than sufficient to meet amenity and retention of open space for this zone.

Description of Proposed Activity

- There have previously been discussions as to the details of what is proposed to be undertaken on site, and one may want to ensure that there is no future debate regarding this.

This was addressed as part of the application detail and further information request so nothing additional is needed there.

The proposed activity is a mix of all those matters raised in No 1 of your (Councils) request for additional information. For completeness, it is proposed to be the main or head office for Midland's so will include administration, management, and office functions for all their key seed trial activities. Visitors from overseas and domestically are a key part of Midlands communication and relationship building so having a facility that performs that function is important. Included as part of this is the seed trial areas for research and development on the site and other sites owned and/or managed by Midlands and bee activities which are essential for pollination etc. A campus was used to describe the overall facility however it's the use of the facilities in terms of administration, management, research, and development and above all a "flagship" facility in terms of seed research and development where NZ is seen as a leader in seed production especially specialty seeds.

Business Effects

One of the questions will be the effect of allowing a head office to establish outside of the town centre. It is recognised that the proposal has several components, and the head office is only one part, but further information /assessments should be provided to both help understand why the head office needs to establish on the site and what the effects of this could be on the town centre. Expert assistance could be worthwhile.

The head office or administration component is an essential and ancillary part of the business and needs to be on this site. Establishing this facility like this so we can showcase specialist seed production in Mid Canterbury to the largest global seed buyers, all the while demonstrating

our world leading capability. This is how it is done in Europe and for us to be taken seriously and adequately represent NZ, we need to establish this facility.

In addition is the efficiency of having all the admin, research, and development on one site very much like Crop and Food Research in Lincoln. Further reasons,

1. Proximity to Agricultural Activity

Field Trials: Rural zones provide direct access to farmland for conducting seed trials and experiments.

Real-world Conditions: Seeds can be tested in the actual environments where they will be used, improving research relevance.

2. Cost Efficiency

Lower Land and Operational Costs: Rural areas typically have lower property prices and utility costs compared to urban centres i.e. you cannot undertake trials on Business or Industrial zoned land based on land value alone.

3. Community and Collaboration

Local Farmer Engagement: Easier collaboration with farmers for participatory research and feedback.

Workforce Development: Opportunity to train and employ local talent, contributing to rural economic growth.

4. Strategic Positioning

Centralization: Reduces dependency on the spread-out existing buildings and facilities on separate sites.

Highly Productive Land

- *The nature of the proposal, including that it is providing a service for rural activities, significantly assists in addressing the NPS HPL and effects on highly productive land but consideration could also be given to what the effects of those 'non rural' aspects of the proposal could be on land productivity. This might include more limited expert opinion.*

The site is classified as containing LUC 2-3 soils and accordingly is High Productive Land under the National Policy Statement for Highly Productive Land (NPSHPL) legislation.

Clause 3.9 (2)(a) provides an exception for activities that provide *for supporting activities on the land*. Further, 3.9(2)(g) provides that the area is small scale ...and has no significant impact on the productive capacity of the land.

Within the MFE guide to implementation this would be considered as an activity that directly supports land-based primary production (arable research and seed/plant trials) and therefore would meet the intent of the guide to implementation.

This legislation is recent in the sense it has only been operative for nearly three years.

With regards to Clause 3.9(2)(g), the second part of the clause qualifies small scale activities where there is no impact on productive capacity. In the least, the scale cannot be such that productive capacity is impacted.

The overall objective of the NPS-HPL in clause 2.1 is that: " *Highly productive land is protected for use in land-based primary production, both now and for future generations*".

The facility proposed in the context of the site is that the buildings and driveway alongside lawn areas and plantings, occupies land used for non-productive purposes, and that the balance of the site is still used productively. Whilst some farm storage has been placed on the site it does not impact on the overall maintenance of productivity and productive capacity of the site. The site area is 8ha and a large area of this will be used for production with the remainder being the supporting activities in terms of research activities and ancillary administration and storage

On this basis I consider that this does not impact on the productive capacity of the wider site and therefore the activity is of a scale that is consistent with achieving the objective of the NPS-HPL.

For the above reasons, I consider that the facility is a small-scale activity and does not impact the productive capacity of the land, as defined in the NPS-HPL. The exception in clause 3.9(2)(g) does apply.

In clause 3.9(3) reverse sensitivity effects in terms of clause 3.9(3)(b) will not arise, therefore the remaining consideration is whether under sub-clause (a) it: "minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land in their district."

The proposal qualifies as an exception under clauses 3.9(2)(a) and (g) and therefore is not an inappropriate use or development to be avoided in terms of clause 3.9(1).

The applicant is proposing a much higher use of production in terms of the intensity of the crop and plant trials for seed than what is currently occurring at the site which is essentially pasture (which is important) but the proposed use is a very good use of the land with little soil loss.

Future Processes / Next Steps

To date there is no awareness of enquiries including neighbours, but BECA has been in contact regarding a firefighting water supply matter which we have covered off and agreed to volunteer as a condition, namely

The consent holder shall ensure that all new buildings are provided with a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ PAS 4509:2008) and evidence of this shall be provided to Council.

After the closure of the submission period this may be a good time for the applicant to provide updated information to both address any submission points and the above points.

Yes- that's what this response is doing and can address what submitters supporting or objecting raise. However, in the case of the Bray submission I am not sure what comments I can make on this as it seems to me this relates more issues surrounding farming practices in terms of bee keeping and comments around commercial honey production. Midlands already have an off-site honey processing facility on JB Cullen Drive in Ashburton. There is no proposal here for that type of production on this site.

In doing so this would also enable any further information to be considered in the section 42A assessment (Council Planning Officers Report).

The points above include matters raised in submissions which have either been resolved through this response or can be resolved alongside the wider matters discussed where responses are provided above and/or information you will include within your planning officer report making recommendations on this proposal.

- *No decision has been made but it is considered likely that, even if no submissions were made, any final determination would be by way of Commissioner.*

Noted

As part of this there is the potential that a hearing may be required (even if no submissions), to ensure that all details are resolved.

The applicant would prefer no hearing and based on the three submitters to be heard, we are confident we can resolve those matters raised in both the Environment Canterbury and Van Polanen submissions. I am not certain at this point that the Bray submission needs to be resolved as the issues relating to beekeeping are permitted as farming activities in Rural zones in this District.

If you require any further information, please do not hesitate to contact me directly on 03 3077 164, 029 3077 164 or david@dhconsulting.co.nz. I am happy to discuss any of these matters.

Yours faithfully,



David Harford
Director

Annexure A: E2 Environmental Summary 18 August 2025

David Harford

From: Harry Petterson <harry.petterson@e2environmental.com>
Sent: Monday, 18 August 2025 10:08 am
To: David Harford
Cc: Richard Bowman; Andrew Tisch; Amanda Brown
Subject: Summary of SW and WW design for Midlands
Attachments: skt 250818 Midlands WW, SW & GW Analysis.pdf

Categories: Action

Hi David,

Below and attached is a summary of stormwater and wastewater design for Midlands, as discussed on Friday. Please let me know if you need any additional details.

Wastewater:

- On-site land discharge of treated wastewater can meet permitted activity status. Comments on the main concerns ECan may have are below:
 - Discharge volume will not exceed 2,000 L/day / 14,000 L/week. Attached are two scenarios of normal operations and maximum allowable operations to stay below 14,000 L/week.
 - The proposed (or similar approved) Austin Bluewater system does not allow more than 2,000 L to be pumped to the disposal field per day.
 - Groundwater is assessed as being at 118.4 m RL (NZVD2016) based on 4 nearby groundwater wells with long term records. This is 2.9 m below the lowest site level and ~4m below the proposed disposal field location. The attached graph / comments provide justification.
- The disposal field will be located outside of human activity areas, and appropriately demarcated. You might find benefit in using it to irrigate non-edible plants.
- At a disposal rate of 3.5 mm/day, based on assumed soil type, the disposal field area will be 570 sq.m for a maximum allowable discharge of 2,000 L/day.

Stormwater:

- A resource consent from ECan will be sought for operational phase discharge to land.
- Stormwater runoff from the main carpark areas will be conveyed to the eastern corner of the site (low-point).
 - Treatment will occur from swales conveying the stormwater to the attenuation basin.
 - Storage and discharge of the stormwater will occur from an attenuation basin and soakhole. Preliminary sizing indicates that the attenuation basin requires 193 m³ storage with a 30 m², soakhole. See attached calcs. The sizing will increase slightly if we need to take runoff from the deck (?) area labelled “13 – Campus plaza”.
 - The road and carpark will need to be moved slightly, similar to as shown on the sketch below:



- The maximum excavation depth will be at most 1.9 m bgl for the soakhole invert, creating 1m separation from GW (see attached GW analysis).
- If the final design includes an 18m wide gravel accessway, there will be an accompanying swale and soakhole along the length to capture stormwater runoff.
- A construction-phase stormwater consent is likely to not be required because the proposed activity meets the permitted activity status under Rule 5.94A.
- An earthworks consent for proposed SW and WW works will not be required if earthworks stay above 119.4 m RL, and are not within 50 m of any surface waterbody.

Ngā mihi nui,

Harry Petterson Civil Engineer



ph **022 522 8787**

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My normal work hours are 9am – 5:30pm, Tuesday – Friday

25070 Midland Properties Racecourse Road Development
Water usage calculations

Date 15-Aug-25
 By AJT / HP

SCENARIO 1 - 10K/WEEK (standard operations)

Week day

Occupancy	Numbers	% Time Available	Net total	Usage [L/p/d]	Subtotal [L/d]	Total
Full time staff	33	80	26	50	1,320	
Part time staff/contractors	20	50	10	50	500	
Visitors	6	50	3	15	45	
			39		1,865	9,325

Weekend

Max Design

Occupancy	Numbers	% Time Available	Net total	Usage [L/p/d]	Subtotal [L/d]	Total
Full time staff	0					
Part time staff/contractors	10	50	5	50	250	
Visitors	0					
			5		250	500
						9,825 L/week

SCENARIO 2 - 14K/WEEK (maximum allowable)

Week day

Occupancy	Numbers	% Time Available	Net total	Usage [L/p/d]	Subtotal [L/d]	Total
Full time staff	33	100	33	50	1,650	
Part time staff/contractors	34	50	17	50	850	
Visitors	12	50	6	15	90	
			56		2,590	12,950

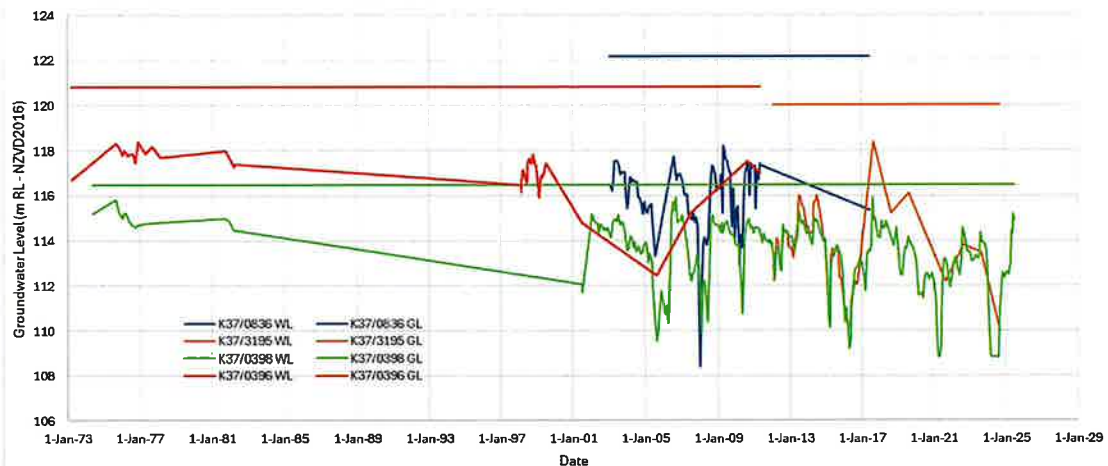
Weekend

Max Design

Occupancy	Numbers	% Time Available	Net total	Usage [L/p/d]	Subtotal [L/d]	Total
Full time staff	0					
Part time staff/contractors	20	50	10	50	500	
Visitors	0					
			10		500	1,000
						13,950 L/week

Groundwater analysis

- Four nearby wells that have long term groundwater records have been analysed.
- Three wells show a maximum water level at ~118.4 m RL (NZVD2016).
- All three of these wells have a ground level of at least 120 m RL.
- Well K37/0398 has a ground level of 116.48 m RL, and a maximum water level of 115.92, 0.56 m bgl.
- We assess that there is a **fixed, maximum groundwater level of 118.4 m RL** for ground above 120m RL, which the Midlands site is for its entire area.
- The lowest point of the site is 121.3 m RL, which results in a minimum depth to groundwater of 2.9 m bgl.



Stormwater Basin and Soakhole Calculations

Catchment Area		Runoff coefficient	Effective Area
Hardstand	0.343 ha	0.85	0.29 ha
SMA	0.034 ha	0.30	0.01 ha
Lots / Berms	0.162 ha	0.30	0.05 ha
	0.539 ha		0.350 ha

First Flush Volume		Rapid Soakage Design	
FF Volume	63.1 m ³	Width	10 m
Basin Area	250 m ²	Length	3 m
FF to rapid soakage depth	0.25 m	Depth	1 m
Shaping factor	35%	Number of Soakage Chambers:	1
Basin size after shaping	338 m ²	Porosity	0.38
		Capacity Reduction Factor	0.3333
		Storage Volume	11.4 m ³
		Infiltration Flow Rate	4.2 l/s
			14.9985 m ³ /hr

50 yr Design Basin

Storm Duration (min)	50 yr Rainfall Intensity (mm/hr)	Mean Runoff Flow Rate, Q_{avg} (l/s)	Total Storm Volume, V_s (m ³)	Soakhole Infiltration & Storage Capacity, (m ³)	Basin Volume required, (m ³)	Basin Depth (m)
10	111.0	108.1	65	14	51	0.20
20	69.9	68.1	82	16	65	0.26
30	54.4	53.0	95	19	76	0.31
60	36.6	35.7	128	26	102	0.41
120	25.0	24.4	175	41	134	0.54
360	13.7	13.3	288	101	187	0.75
720	9.3	9.0	390	191	198	0.79
1440	6.1	6.0	514	371	143	0.57

Annexure B: Aqualinc Memorandum 18 August 2025

Memorandum

To:	<u>Richard Bowman</u>	Of:	<u>Midlands Seeds</u>
	<u>David Harford</u>		<u>David Hard Consulting Ltd</u>
From:	<u>Rose Edkins</u>	Date:	<u>18 August 2025</u>
Reviewed by:	<u>John Knight</u>	Job no:	<u>AQ25121</u>
Subject:	<u>Water Supply for Proposed New offices</u>		

1 Introduction

Midlands Properties Ltd (Midlands) own a property located at 309 Methven Highway, Ashburton, as shown in Figure 1.1. The property area is approximately 24 ha. Midlands hold consent CRC232183 that authorises the take of groundwater from bore K37/0836, for purposes of irrigation.

Midlands propose to develop a new office and field trial areas on the property as shown in Figure 1.2.

Aqualinc has been asked to provide an assessment on whether a properly authorised water supply can be secured for the proposed new office.

1.1 Project Scope

The scope of the project is as follows:

- Calculate water requirements.
- Review of bore K37/0836, including an assessment of bore performance.
- Assess groundwater quality.
- Review existing consent CRC232183 and liaise with ECan regarding using this consent for purposes of office water supply.
- Provide advice on requirements under the Water Services Act for becoming a registered water supplier and requirements for supply of a safe water supply.

Midlands
24.65 309 Methven Drive



Figure 1.1: Property location



Figure 1.2: Location of proposed new office and field trial area

2 Water Requirements

Office water requirements have been estimated based on expected numbers of full-time employees, field, part time or casual staff and visitors when they hold field days (or similar) at the site.

David Harford has advised the following:

- There will be approximately 30 to 33 full time staff working at the office.
- At times there may be approximately 37 to 40 contractors, field and or part time or casual staff on-site. However, this is expected to be intermittent, and use of the office facilities will be infrequent.
- At times there may be approximately 1 to 27 visitors. Visitor numbers are expected to vary and be intermittent, i.e. for the majority of the time there may be no visitors.
- Typical office hours will be 8am to 5pm, Monday to Friday. The office will be closed over the weekend. However, there will be field operation occurring with field staff and management, as required.
- Overall, there may be up to 100 people on-site from time to time.

Thus, for the purposes of calculating office water requirements the following has been assumed:

- Average water requirements are based on 53 people on-site (33 full time staff, plus 20 contractors/field and/or part time or casual staff and/or visitors).
- Peak water requirements are based on 100 people on-site. Note that this is expected to occur infrequently.

Andrew Tisch of E2 Environmental has supplied the following information relating to the wastewater system design and treatment:

- According to Auckland Council's Guideline Document GD06 for on-site wastewater management the daily wastewater allowances are
 - Day staff: 40 l/person/day.
 - Visitors: 10 to 20 l/person/day.

These numbers provide a good guide for expected office water use requirements, and have been used for calculating average (Table 2.1) and peak (Table 2.2) water requirements. Table 2.1 shows that average water requirements are expected to range from 1,400 to 1,720 l/day (average flowrate of 0.02 l/s) and Table 2.2 shows that peak water requirements are expected to range from 1,870 to 2,720 l/day (average flowrate of 0.02 to 0.031 l/s).

Table 2.1: Average water requirements

Description	Number of people	Unit (l/person/day)	Typical Total (l/day)
Full time staff	30 to 33	40	1,200 to 1,320
Contractors/field and/or part time or casual staff, and/or visitors	20	10 to 20	200 to 400
Total			1,400 to 1,720 l/day Av. flowrate of 0.016 to 0.020 l/s

Table 2.2: Peak water requirements

Description	Number of people	Unit (l/person/day)	Typical Total (l/day)
Full time staff	30 to 33	40	1,200 to 1,320
Contractors/field and/or part time or casual staff, and/or visitors	67 to 70	10 to 20	670 to 1,400
Total			1,870 to 2,720 l/day Av. flowrate of 0.022 to 0.031 l/s

In addition, David Harford has advised that a 30,000 litres (30 m³) storage tank is required on-site for firefighting purposes. If the initial tank fill is setup to take 24 hours, the pump flowrate required would be 0.35 l/s. Thus, the combined office water and tank fill requirements for firefighting will be no more than 0.5 l/s.

3 Review of Bore K37/0836

A review of bore K37/0836 has been undertaken including an assessment of bore performance to check that it can supply the necessary flow and volumes required.

3.1 Bore Details

Details for bore K37/0836 are provided in Table 3.1.

Table 3.1: Bore Details

Description	Bore K37/0836
Owner	Midland Properties Ltd
Use	Irrigation and domestic supply
Easting Northing (NZTM)	1407951 - 5142697
Drill depth (m)	66 ^(a)
Drill date	08/10/1998 ^(b)
Diameter (mm)	250 / 200 ^(c)
Initial static water level (m bgl)	6.00
Recorded water level range (m bgl)	3.95 – 13.75
Maximum flow tested (l/s)	41
Drawdown at maximum flow (m)	13
Casing	Steel
Screen	Slotted casing 61.5 – 62 Stainless steel 62 – 63.5 Stainless steel 64.5 – 66
Notes:	
(a) Bore originally drilled to 15 m.	
(b) Bore deepened 09/09/2002.	
(c) Bore extended by telescoping 200 mm casing inside 250 mm casing.	

3.2 Bore Performance

Bore performance is affected by groundwater levels as well as the flow-drawdown relationship for the bore.

3.2.1 Flow-Drawdown Relationship

The flow-drawdown relationship for bore K37/0836 is shown in Figure 3.1.

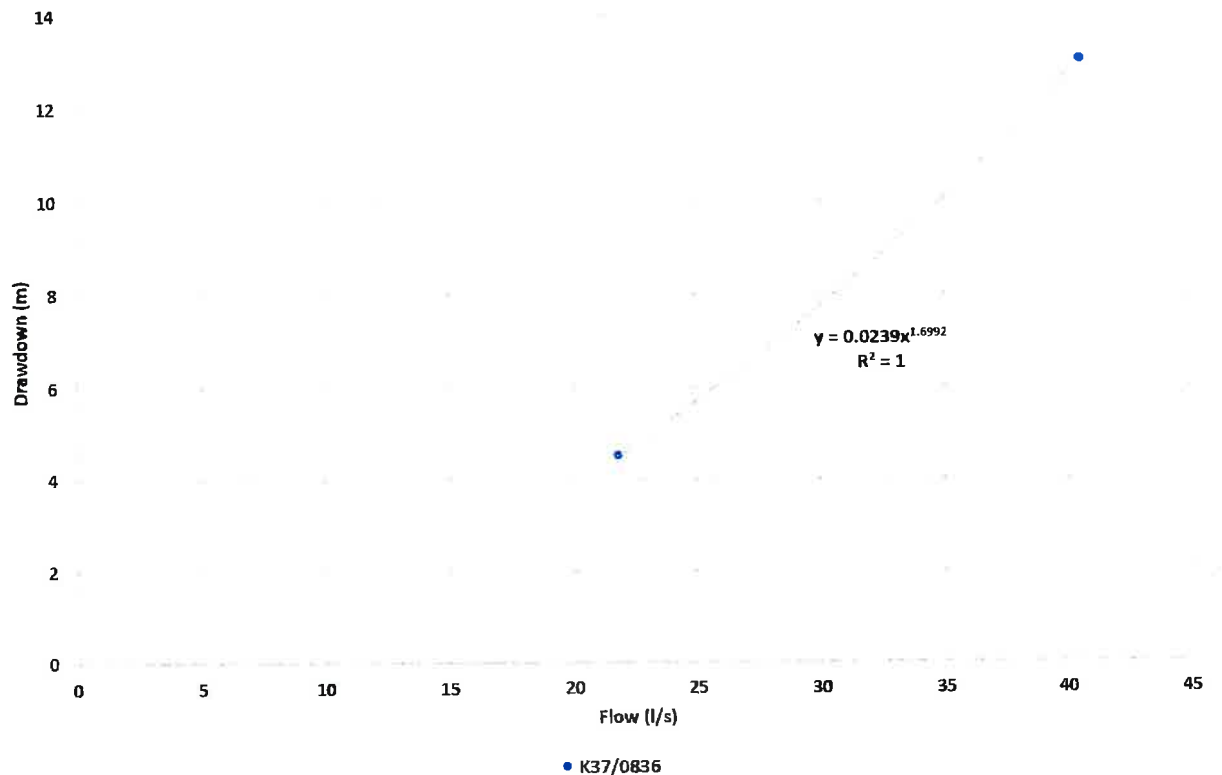


Figure 3.1: Drawdown versus flow rate for the bore K37/0836

The flow-drawdown relationship is used in assessment of sustainable yield for bore K37/0836 (see Table 3.2).

3.2.2 Groundwater Level Records

Groundwater level records have been recorded regularly in bore K37/0836 from February 2003 to June 2011 as shown in Figure 3.2. During this time groundwater levels fluctuated from 4 to 13.8 m bgl. Long term groundwater levels have been recorded in bore L37/0403 (37.8 m deep) located approximately 3.9 km southeast of the site. Although, this bore is shallower than bore K37/0836, it will still provide an indication of possible longer-term fluctuations in groundwater levels. The total range in groundwater levels for this bore is approximately 10 m (see Figure 3.2).

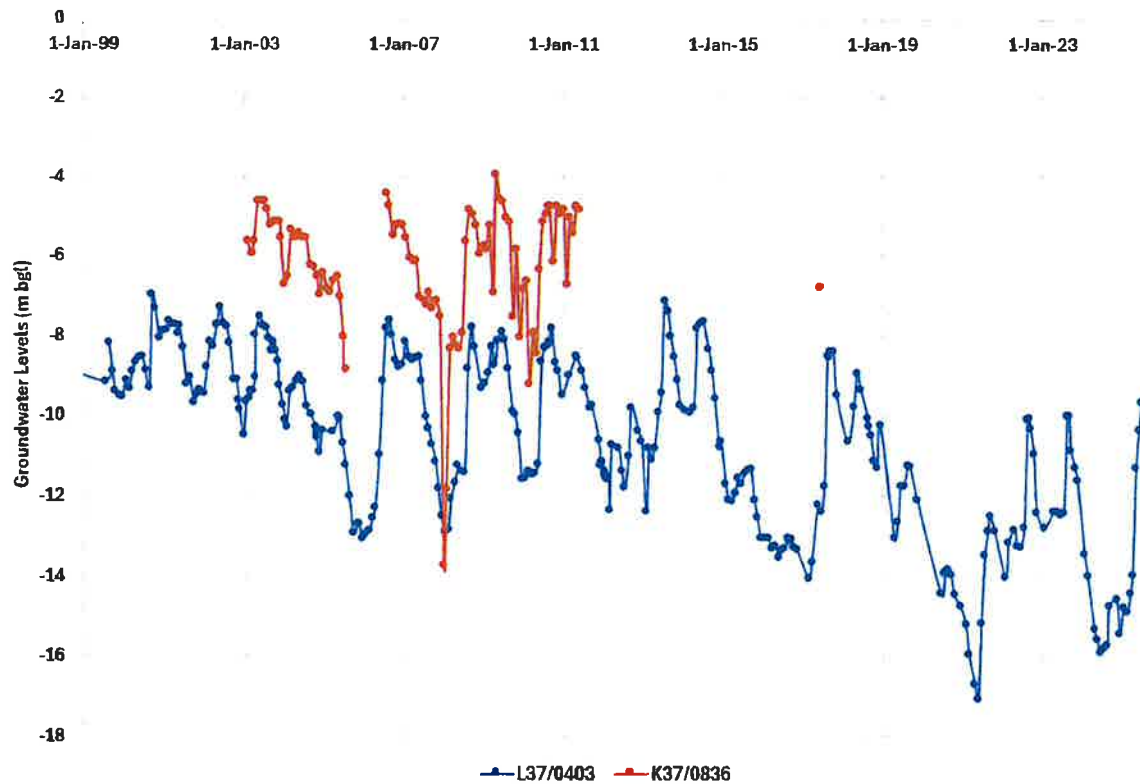


Figure 3.2: Groundwater level records in bores K37/0836 and L37/0403

A correlation between the two datasets has been undertaken as shown in Figure 3.3.

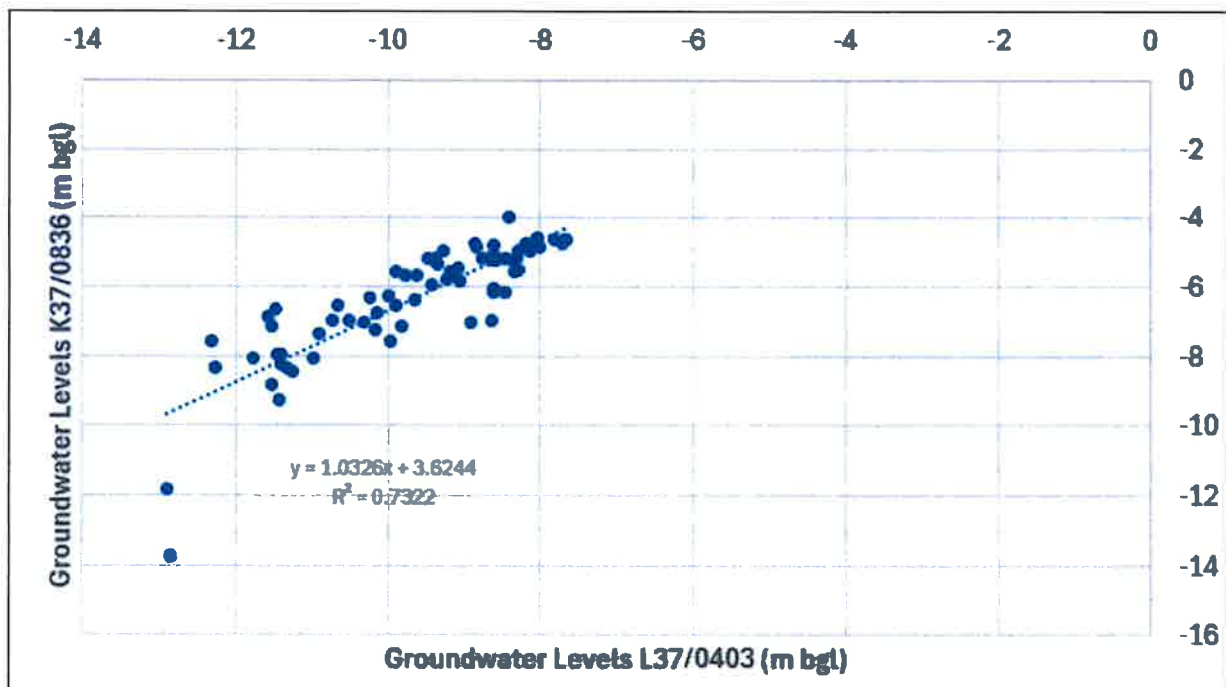


Figure 3.3: Correlation between bore K37/0836 and L37/0403

The expected highest, average and lowest groundwater levels in bore K37/0836 have been calculated based on the derived relationship with bore L37/0403 (see Figure 3.3) as shown in Table 3.2. It is noted that lowest water levels are less accurate on the relationship and thus may be underestimated based on this calculation and it is possible that lowest water levels in bore K37/0836 may be as low as 17 to 18 m bgl. Thus, for the following assessment a lowest water level of 18 m has been assumed.

Table 3.2: Expected range in groundwater levels for bore L37/0403 and K37/0836

Description	L37/0403	K37/0836
Highest water level (m bgl)	7.00	3.60
Average water level (m bgl)	10.43	7.14
Lowest water level (m bgl)	17.07	14.00 (18 m used in following assessment)

3.2.3 Maximum Flow

Based on lowest water levels and expected self-induced drawdown, a check has been made on bore K37/0836 to ensure that at the expected lowest water level of 18 m bgl (used for possible worst case) the consented full flowrate of 20 l/s will be able to be pumped.

Table 3.3 shows that at time of lowest groundwater levels bore K37/0436 can pump the consent flowrate of 20 l/s (see Table 5.1).

Table 3.3: Assessment of bore K37/0836 maximum flow

Bore details	K37/0836
Depth (m bgl)	66
Screen (m bgl)	61.5-62.0 62.0-63.5 64.5-66.0
Estimated lowest water level (m bgl)	18
Top of pump (m bgl) (assumed to be installed as low as possible in bore)	57.5
Minimum allowable water level (allowance of 2 m above pump (m bgl)	55.5
Available water (m)	37.5
Consented maximum flow (l/s)	20 l/s
Maximum flow able to be pumped at times of low water level (l/s)	>20 l/s ^(a)
Note:	
(a) Drawdown = $0.0239 \times \text{Flow}^{1.69}$ (see Figure 3.1).	

4 Groundwater Quality

A review of groundwater quality data has been undertaken to assess the suitability of the bore water supply for purpose of drinking water supply.

No water quality data is available for bore K37/0836. Thus, groundwater quality data within a 5 km radius has been reviewed. Figure 4.1 shows that there are five bores in a 5 km radius with groundwater quality information. Details for these five bores are provided in Table 4.1. Groundwater quality sample results for the most recent sample are provided in Table 4.2, alongside the Water Services (Drinking

Water Standards for New Zealand) Regulations 2022 and the NZ Drinking Water Standards Revised 2018, Maximum Acceptable Values (MAV) or Guideline Value (GV).

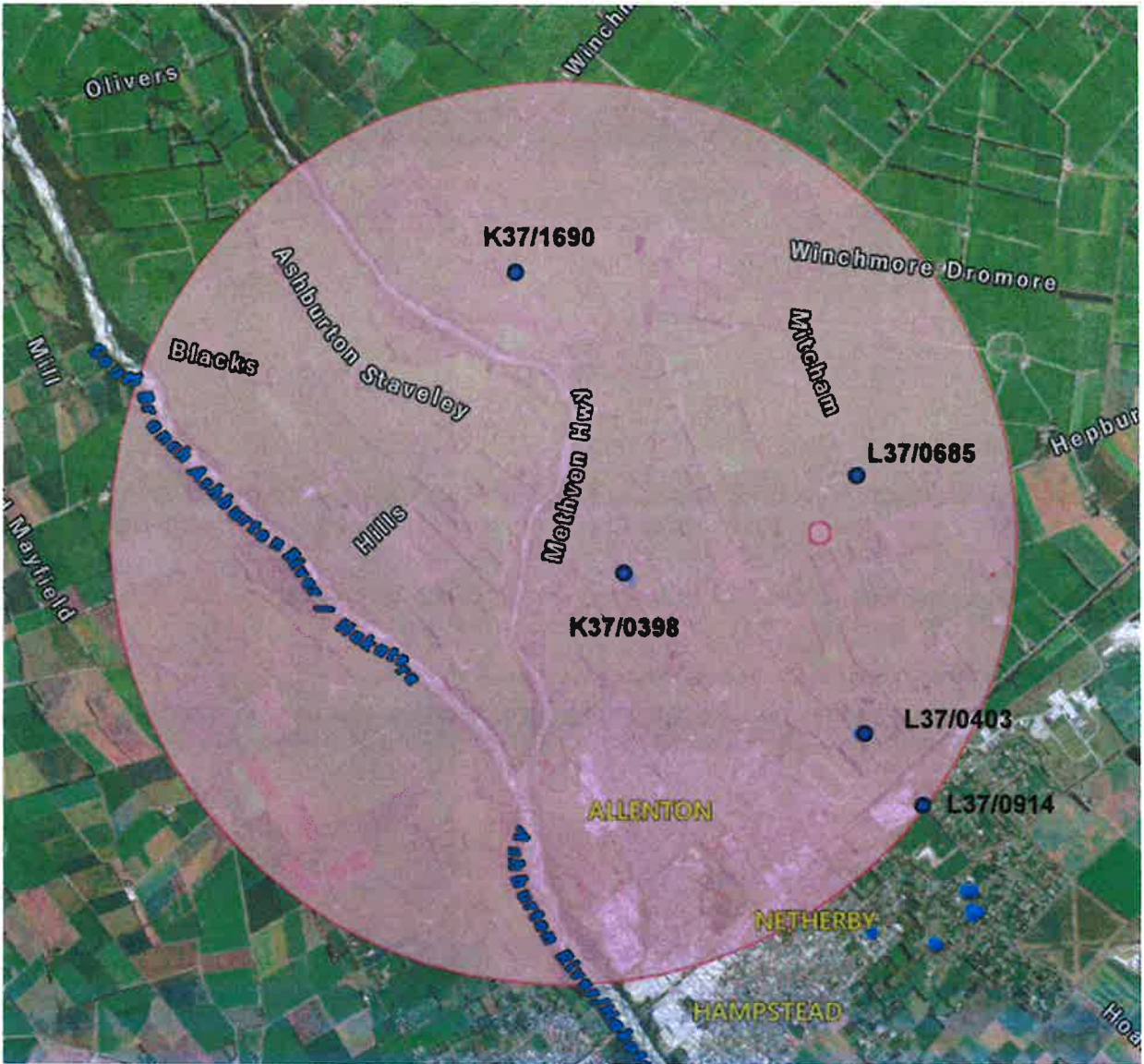


Figure 4.1: Location of bores in a 5 km radius with groundwater quality data

Table 4.1: Bores within a 5km radius with groundwater quality data

Description	K37/1690	K37/0398	L37/0685	L37/0403	L37/0914
Depth (m)	30	7.9	34	37.8	20.0
Screen (m)	28.5 – 30.0	-	33-34	26.5-37.8	-
Most recent sample	27/05/2025	27/05/2025	07/11/2024	07/11/2024	21/05/2025

Table 4.2: Groundwater quality results for bores within a 5 km radius

Sample	Unit	K37/1690	K37/0398	L37/0685	L37/0403	L37/0914	MAV / GV
Sample date	-	27/05/2025	27/05/2025	07/11/2024	07/11/2024	21/05/2025	
Total Alkalinity	g/m ³ as CaCO ₃	49	43	54	73	37	
Ammoniacal Nitrogen	mg/l	<0.010	<0.010	<0.010	<0.010	-	
Bicarbonate	mg/l	60	52	65	89	45	
Calcium Dissolved	mg/l	19	18.6	21	27	23	
Chloride	mg/l	5.7	10.4	8.4	7.8	21	250 (taste /corrosion)
Chromium, Dissolved	mg/l	-	-	<0.005	<0.005	-	0.05
Conductivity (EC)	µS/cm	16.7	16.7	23	26.4	23.6	<1500µs/cm (mS/m)
Difference in Ion Balance	%	0.620	0.84	0.26	0.630	<0.1	
Dissolved Oxygen	mg/l	8.96	6.2	10.7	5.89	5.15	
Dissolved Oxygen Saturation	%	83.9	60.1	110	55.5	49.2	
Dissolved Reactive Phosphorus	mg/l	0.0038	0.0067	0.0055	0.0032	0.0047	
E. coli	MPN/100mL	-	-	<1	<1	<1	<1
Hardness, Total	g/m ³ as CaCO ₃	64	62	81	98	79	200 100-300 (taste threshold)
Iron, Dissolved	mg/l	<0.020	<0.020	<0.020	<0.020	-	0.2 (staining of laundry)
Magnesium, Dissolved	mg/l	4.1	3.8	6.8	7.6	5.2	NA
Manganese, Dissolved	mg/l	0.0007	<0.0005	0.01	<0.0005	-	0.4 (staining of laundry)

Sample	Unit	K37/1690	K37/0398	L37/0685	L37/0403	L37/0914	MAV / GV
							0.10 (taste threshold)
Nitrate Nitrogen	mg/l	4.0	4.0	9.1	9.5	6.6	11.3
Nitrate-N Nitrite-N	mg/l	4.0	4.0	9.1	9.5	-	
Nitrite Nitrogen	g/m ³	<0.002	<0.002	<0.002	0.004		
Oxidation Reduction Potential	mV	279	244.8	272.1	243.1	191.7	
pH	pH	6.7	6.4	7.3	7.5	6.4	7.0-8.5
Potassium, Dissolved	mg/l	1.09	1.07	1.19	1.37	1.38	
Silica, Reactive	g/m ³ as SiO ₂	15.4	12.6	17.4	18.9	17.1	
Sodium, Dissolved	g/m ³	6.7	6.8	12.3	13.8	12.4	200
Sulphate	mg/l	9.6	7.7	11.2	13.4	17.1	250 (taste threshold)
Sum of anions	meq/l	1.63	1.59	2.2	2.6	2.2	
Sum of cations	meq/l	1.61	1.57	2.2	2.6	2.2	
Total Coliforms	MPN/100mL	-	-	<1	<1	42	<1
Total Dissolved Phosphorous	Mg/l	0.005	0.008	0.005	0.003	-	
Water temperature	Degrees C	11.9	13.6	-	12.4	13.5	

The results from this sampling show that the groundwater quality is generally of a good standard, and the majority of water quality parameters sampled are within or below the NZ Drinking Water Standards revised 2018 (NZDWS) Maximum Acceptable Values (MAV) or Guideline Value (GV).

The following is noted:

- In three of the five bores pH at 6.4 to 6.7 is lower than the MAV of 7.0-8.5, which can increase the potential for corrosivity of plumbing and appliances. This may indicate pH correction may be required.
- In addition, although E.Coli was <1MPN/100 ml for all five bores, Total Coliforms was recorded as 42 MPN/100 ml in bore L37/0914 (the four other bores were ok). Total Coliforms indicate a potential pathway for pathogens may be present. This will need to be considered within the water treatment process.¹
- Nitrate-nitrogen for three of the five bores is higher than half of the MAV. Although these values are within recommended limits, this will need to be monitored going forward. In the event that Nitrate-Nitrogen is high within bore K37/0836, then suitable water treatment for removal of Nitrate-Nitrogen may be required.

It is recommended that water quality sampling be undertaken on bore K37/0836 to confirm the quality of water supplied from this bore. This information will be used to inform water treatment requirements for this bore water. However, based on the information in the surrounding area, it is expected that the groundwater supplied from bore K37/0836 with suitable water treatment will meet the necessary status to be considered a potable water supply.

5 Consenting Requirements

A review of existing consent CRC232183 has been undertaken including seeking advice from Environment Canterbury (ECan) regarding using this consent for purposes of office water supply, and alternative options.

5.1 Consent Details CRC232183

Details for consent CRC232183 are provided in Table 5.1. This shows that this consent has sufficient consented water for purposes of office water supply, with the remainder able to be used for irrigation.

Table 5.1: Consent Details CRC232183

Description	Consent CRC232183
Maximum flowrate	20 l/s
Maximum volume / 14 days	21,316 m ³ / 14 days (av. of 17.6 l/s)
Annual volume	155,142 m ³ (av. of 4.9 l/s)
Consent expiry	21 March 2037

¹ Guidelines for Drinking Water Quality Management for NZ: Chapter 5 General Microbiological Quality, May 2019.
Page 11 of 24

5.2 ECan Pre-application Advice

As discussed in Section 5.1, Midlands hold consent CRC232183 that authorises the take of groundwater from bore K37/0836, for purposes of irrigation.

We have sought pre-application advice from Environment Canterbury (ECan) as to the best approach for consenting the water supply for the proposed new offices (see Appendix B).

ECan have advised that consent CRC232183 cannot be used for purposes of water supply to an office. In addition, ECan advised the following regarding consent CRC232183:

- Consent CR232183 was granted in 2011 under the proposed Natural Resource Regional Plan. It was just a take of water as the use for irrigation met all Permitted Activity (PA) rules. The Land Water Regional Plan (LWRP) later required consent for irrigation use, but the consent holder did not apply for this under Section 20A of the RMA. At this point you can still apply for the use aspect for irrigation as it was a take for irrigation.
- Consent CRC232183 can only be used for irrigation. ECan will not accept an application to include the new office water use as it is outside of the scope of the consent granted.
- The groundwater allocation zone is overallocated, so no new water can be granted.
- Pathway 1 - Use water from the same bore K37/0836 within permitted activity limits (Rule 5.114 LWRP):
 - Less than 5 l/s
 - Between 10 to 100 m³/day
 - Bore must be greater than 20 m from property boundary and surface water.
 - Cannot use irrigation consent CRC232183 on the same day (e.g. 1 day a week pump water for office use to storage and irrigate other days).
- Pathway 2 – Permanent consent
 - Transfer take and use of water from another consent within the same groundwater allocation zone that has the use of being 'office supply' and meet conditions of Rule 13.5.32 LWRP.
 - The assessment of environmental effects would need to include a well interference effects on neighbours, stream depletion assessment and new effects.
 - Install a separate water meter for irrigation and office use.

Below we have completed a review to assess viability of Pathways 1 and 2.

5.3 Pathway 1

Pathway 1 is to use water from the same bore K37/0836 within permitted activity limits, on alternate days to when this bore is used for irrigation.

LWPR Rule 5.114 states the following:

5.114 *The taking and using of less than 5 L/s and more than 10 m³ but less than 100 m³ per property per day of groundwater on a property more than 20ha in area is a permitted activity, provided the following conditions are complied with:*

1. *The bore is located more than 20 m from the property boundary or any surface waterbody.*

5.114 A *The taking and using of:*

(a) less than 5L/s and 10m³ per property per day of groundwater that does not meet the condition of Rule 5.113; or

(b) less than 5L/s and more than 10m³ but less than 100m³ per property per day of groundwater on a property more than 20ha in area that does not meet the condition of Rule 5.114;

is a restricted discretionary activity.

The exercise of discretion is restricted to the following matter:

1. The actual and potential adverse environmental effects of not meeting the condition of Rule 5.113 or Rule 5.114.

The water requirements for the office have been calculated to average up to 1,720 l/day (1.72 m³/d) and peak up to 2,720 l/day (2.72 m³/d). Thus, the take and use is less than the PA 5 l/s and 100 m³/day.

Preliminary calculations have been undertaken on the viability of filling storage tanks one day per week while still maintaining PA status, as follows:

- To supply an average of 1.72 m³/day, a weekly total of 12 m³ is required (thus, a minimum tank size of 15 m³ is recommended). For this scenario it is proposed to pump 12 m³ one day per week. **A daily volume of 12 m³ is less than the 100 m³ PA limit².**
- To pump a volume of 12 m³ in one day, requires an average pump flowrate of 0.28 l/s, assuming the pump is operating for 12 hours of the day. **A pump flowrate of 0.28 l/s is well within the PA limit of 5 l/s³.**

The location of bore K37/0836 relative to the property boundary is shown in Figure 5.1. However, as the bore is located 10 m from the property boundary, it does not meet item 1 which requires the bore to be located 20 m from the property boundary. **This means that the activity does not meet the Permitted Activity status and would be a restricted discretionary activity. Consequently, a consent is required for this activity. The exercise of discretion is restricted to the actual and potential adverse environmental effects of not meeting the condition of Rule 5.113 or Rule 5.114.**

It is expected that this consent application would be relatively straight forward as the assessment will be focused on the amenity effects of the bore and pump causing noise/vibration/visual effects on the neighbouring property. Because the land is only used for farming and there are no immediately adjacent dwellings there should be no effects generated by the bore being 12 m away instead of 20 m.

² With the inclusion of filling the firefighting storage tank of 30 m³, which will be infrequent, daily volume limit will remain within PA limit.

³ With the inclusion of filling the firefighting storage tank of 30 m³, which will be infrequent, daily flowrate will remain within PA limit.



Figure 5.1: Location of bore K37/0836 relative to property boundary

5.4 Pathway 2

Pathway 2 is to transfer take and use of water from another consent within the same groundwater allocation zone that has the use of being 'office supply' and meet conditions of Rule 13.5.32 LWRP.

It will be difficult to identify an existing consent in the existing groundwater allocation zone that specifies 'office supply' as a use, as typically offices are located within town boundaries and supplied by town water supply infrastructure. Or, where this is not the case they are likely to be operating under the Permitted Activity Rule.

Thus, it is unlikely that this will be a viable option.

5.5 Additional Pathway

Pathway 3 - Another would be to drill a new well specifically for the purposes of office water supply. To ensure that it can operate under as a PA, the bore needs to be drilled a minimum of 20 m from the property boundary. No consent is required. However, as with Pathway 1 water could only be taken on days when the irrigation consent was no being used.

5.6 Summary

There are three pathways for consenting the office water supply, including:

1. Pathway 1 – Apply for consent to take water for office use from bore K37/0836 as a permitted activity. Water can only be used for office water use on alternative days to irrigation.
2. Pathway 2 – Transfer take and use of water from another consent within the same groundwater allocation zone that has the use of being 'office supply'.
3. Pathway 3 – Drill a new bore specifically for purposes of office water supply and operate under PA, by ensuring that bore is drilled more than 20 m from the property boundary. No consent is required. Water can only be used for office water use on alternative days to irrigation.

Pathway 1 is likely to be the best option to proceed with.

6 Drinking Water Supply

As the bore water will supply water to an office it will be classified as a 'drinking water supplier' and they must ensure the drinking water delivered from the bore is safe and the risk to the supply is managed.

Taumata Arowai, the drinking water regulator for New Zealand, has applied rules to all drinking water suppliers and suppliers now have responsibilities to meet the Drinking Water Quality Assurance Rules 2022, under the Water Services Act 2021, in order to manage the risk of supplying unsafe drinking water. Under these rules, the bore water supply may choose one of two registration compliance pathways;

1. Adopt the 'Acceptable Solution for Spring and Bore Water Supplies'⁴ (Acceptable Solution) framework
2. Register as a 'Small Self Supplied Buildings' supply

The below sections outline the options available for this drinking water supply to meet the legislative requirements and ensure a safe water supply. Midlands will need to register the water supply with Taumata Arowai and be compliant with the Rules.

6.1 Acceptable Solution for Spring and Bore Water Supplies Option

For this water supply to be eligible to use the Acceptable Solution, the water supply must comply with the entirety of the Acceptable Solution.

The Acceptable Solution includes:

- Source water monitoring to check that it is suitable for end point treatment (cartridge filtration and or UV disinfection)⁵. Depending on results of this monitoring, additional pre-treatment may be required to ensure effective cartridge filtration and UV disinfection.
- An end point treatment system must be designed, configured and installed in accordance with this Acceptable Solution. This would mean a validated filtration and UV treatment system would be required.

⁴ Taumata Arowai (2022): Drinking Water Acceptable Solution for Spring and Bore Water Supplies. October 2022.

⁵ Minimum of 3 samples representing a range of environmental conditions (such as heavy rainfall and a dry period) including the following parameters (iron, manganese, nitrate, arsenic, boron, silica and hardness)

- On going monitoring of water quality is required, both before and after treatment.
- No chlorination and subsequent residual disinfection is required under this solution.
- A Water Safety Plan is not required under this option.

In addition, Section 1.2.3 of this 'Acceptable Solution' allows for the population supplied by the end point treatment system to exceed its base limit:

- For a total of not more than 60 days in any 12 month period.
- Is subject to the water supply having the capacity to supply treated water for these periods.
- Is subject to additional monitoring requirements (for example sampling for E. coli and total coliforms for the week prior to the event and twice each week until population no longer exceeds 100 people).

6.2 Small Self Supplied Buildings Option

The Drinking Water Quality Assurance Rules are based on population served and as the Midlands supply and as the system would need to cater for approximately 53 people and on occasion more. The Midlands supply would be classified as a 'Small Self Supplied Buildings Supply' which must meet the rules appropriate for the risk associated with water distribution to a population of between 26 to 100 people.

To meet the compliance criteria of the 'Small Self Supplied Buildings Supply' category the main considerations include:

- Source water monitoring to check that it is suitable for end point treatment (cartridge filtration and or UV disinfection)⁶. Depending on results of this monitoring, additional pre-treatment may be required to ensure effective cartridge filtration and UV disinfection.
- An end point treatment system must be designed, configured and installed in accordance with this Acceptable Solution. This would mean a validated filtration and UV treatment system would be required.
- On going monitoring of water quality is required, both before and after treatment.
- No chlorination and subsequent residual disinfection is required under this solution.
- A Water Safety Plan is required under this option.

6.3 Summary

The solutions for both the Acceptable Solution and the Small Self Supplied Building Supply' are comparable. Adopting the 'Acceptable Solution' is likely to be the best way forward as a Water Safety Plan is not required.

7 Conclusions

The following conclusions have been made:

⁶ Minimum of 3 samples representing a range of environmental conditions (such as heavy rainfall and a dry period) including the following parameters (iron, manganese, nitrate, arsenic, boron, silica and hardness)

- Water requirements
 - Average water requirements are expected to range from 1,400 to 1,720 l/day (average flowrate of 0.02 l/s).
 - Peak water requirements are expected to range from 1,870 to 2,720 l/day (average flowrate of 0.02 to 0.031 l/s).
 - Initial fill of storage tank for firefighting purposes (30 m³) will require a flow of 0.5 l/s (filling over one day).
- Bore K37/0836
 - At times of lowest groundwater levels bore K37/0436 can pump the consented flowrate of 20 l/s.
- Groundwater quality
 - No water quality data is available for bore K37/0836.
 - Groundwater quality data within a 5 km radius was reviewed and showed that the groundwater quality is generally of a good standard, and the majority of water quality parameters sampled are within or below the NZDWS MAV or GV.
 - Based on the information in the surrounding area, it is expected that the groundwater supplied from bore K37/0836 with suitable water treatment (pathogen removal, and possible pH correction and Nitrate-Nitrogen removal) will meet the necessary status to be considered a potable water supply.
- Consenting Requirements
 - Existing irrigation consent CR232183 when granted in 2011 was just a take of water as the use for irrigation met all PA rules. The LWRP later required consent for irrigation use, however this has never been applied for.
 - Consent CRC232183 can only be used for irrigation. ECan will not accept an application to include the new office water use as it is outside of the scope of the consent granted.
 - The groundwater allocation zone is overallocated, so no new water can be granted.
 - Three pathways identified:
 - Pathway 1 – Apply for consent to take water for office use from bore K37/0836 as a permitted activity. Water can only be used for office water use on alternative days to irrigation.
 - Pathway 2 – Transfer take and use of water from another consent within the same groundwater allocation zone that has the use of being 'office supply'.
 - Pathway 3 – Drill a new bore specifically for purposes of office water supply and operate under PA, by ensuring that bore is drilled more than 20 m from the property boundary. No consent is required.
 - Pathway 1 is likely to be the best option to proceed with.
- Drinking water supply
 - Drinking water supply will need to be registered with Taumata Arowai and will need to be compliant with the Rules.
 - Two pathways identified for compliance of Rules:
 - Acceptable Solution
 - Small Self Supplied Buildings Supply
 - Acceptable Solution is likely to be the best pathway.
 - Acceptable Solution requires the following:

- Source water monitoring to check that it is suitable for end point treatment (cartridge filtration and or UV disinfection). Depending on results of this monitoring, additional pre-treatment may be required to ensure effective cartridge filtration and UV disinfection.
- An end point treatment system must be designed, configured and installed in accordance with this Acceptable Solution. This would mean a validated filtration and UV treatment system would be required.
- On going monitoring of water quality is required, both before and after treatment.
- No chlorination and subsequent residual disinfection is required under this solution.
- A Water Safety Plan is not required under this option.

8 Recommendations

The following recommendations have been made:

- Undertake water quality sampling on bore K37/0836 to confirm the quality of water supplied from this bore. This information will be used to inform water treatment requirements for this bore water. A minimum of 3 samples is required representing a range of environmental conditions (such as heavy rainfall and a dry period) including the following parameters (iron, manganese, nitrate, arsenic, boron, silica and hardness).
- Proceed with consent application to add 'use' to the existing irrigation 'take' consent CRC232183.
- Proceed with consent application to apply for consent to take water for office use from bore K37/0836 as a permitted activity. Water can only be used for office water use on alternative days to irrigation.
- Register office water supply with Taumata Arowai and proceed with Acceptable Solution pathway to ensure compliance with Rules.

Appendix A: Consent CRC232183

RESOURCE CONSENT CRC232183

Under Section 104 of the Resource Management Act 1991

The Canterbury Regional Council (known as Environment Canterbury)

GRANTS TO:	Midlands Properties Limited
A WATER PERMIT (S14):	To take water
COMMENCEMENT DATE:	09 Nov 2011
DATE CONSENT NUMBER ISSUED:	07 Jun 2022
EXPIRY DATE:	21 Mar 2037
LOCATION:	309 Methven Highway, ASHBURTON

SUBJECT TO THE FOLLOWING CONDITIONS:

- 1 Water may be taken only from bore K37/0836, 250 millimetres diameter and 66 metres deep, at map reference NZTM BY21:9795-4269 (NZMS 260 K37:07925-04306).
- 2 Water may be taken at a rate not exceeding 20 litres per second, with a volume not exceeding 21,316 cubic metres in any period of 14 consecutive days, and 155,142 cubic metres between 1 July and the following 30 June.
- 3 Resource consent CRC030721 shall be surrendered before the first exercise of this consent.
- 4 The standing water level, relative to ground level, in bore K37/0836 shall be measured:
 - a. Once at the start of the irrigation season before pumping has commenced;
 - i. once two days after the cessation of pumping at the end of the irrigation season; and
 - ii. once within the first seven days of each calendar month outside of the irrigation season.
 - b. All measurements of the standing water level and date of measurement shall be recorded in a log book kept for that purpose, and supplied to the Canterbury Regional Council, Attention: RMA Compliance and Enforcement Manager, each year during the month of June, or when requested in writing.
- 5 The consent holder shall, before the first exercise of this consent, install an easily accessible straight pipe(s), with no fittings or obstructions that may create turbulent flow conditions, of a length at least 15 times the diameter of the pipe, as part of the pump outlet plumbing or within the mainline distribution system.
- 6 The consent holder shall before the first exercise of this consent:
 - a.
 - i. install a water meter(s) that has an international accreditation or equivalent

- New Zealand calibration endorsement, and has pulse output, suitable for use with an electronic recording device, which will measure the rate and the volume of water taken to within an accuracy of plus or minus five percent as part of the pump outlet plumbing, or within the mainline distribution system, at a location(s) that will ensure the total take of water is measured; and
- ii. install a tamper-proof electronic recording device such as a data logger(s) that shall time stamp a pulse from the flow meter at least once every 60 minutes, and have the capacity to hold at least one season's data of water taken as specified in clauses (b)(i) and (b)(ii), or which is telemetered, as specified in clause (b)(iii).
- b. The recording device(s) shall:
 - i. be set to wrap the data from the measuring device(s) such that the oldest data will be automatically overwritten by the newest data (i.e. cyclic recording); and
 - ii. store the entire season's data in each 12 month period from 1 July to 30 June in the following year, which the consent holder shall then download and store in a commonly used format and provide to the Canterbury Regional Council upon request in a form and to a standard specified in writing by the Canterbury Regional Council; or
 - iii. shall be connected to a telemetry system which collects and stores all of the data continuously with an independent network provider who will make that data available in a commonly used format at all times to the Canterbury Regional Council and the consent holder. No data in the recording device(s) shall be deliberately changed or deleted.
 - c. The water meter and recording device(s) shall be accessible to the Canterbury Regional Council at all times for inspection and/or data retrieval.
 - d. The water meter and recording device(s) shall be installed and maintained throughout the duration of the consent in accordance with the manufacturer's instructions.
 - e. All practicable measures shall be taken to ensure that the water meter and recording device(s) are fully functional at all times.
- 7 Within one month of the installation of the measuring or recording device(s), or any subsequent replacement measuring or recording device(s), and at five-yearly intervals thereafter, and at any time when requested by the Canterbury Regional Council, the consent holder shall provide a certificate to the Canterbury Regional Council, Attention: RMA Compliance and Enforcement Manager, signed by a suitably qualified person certifying, and demonstrating by means of a clear diagram, that:
- a. The measuring and recording device(s) has been installed in accordance with the manufacturer's specifications; and
 - b. Data from the recording device(s) can be readily accessed and/or retrieved in accordance with clauses (b) and (c) of condition (6).
- 8 The Canterbury Regional Council, Attention: RMA Compliance and Enforcement Manager, shall be informed immediately on first exercise of this consent by the consent holder.
- 9 The taking of water in terms of this permit shall cease for a period of up to 48 hours, on notice from the Canterbury Regional Council, to allow measurement of natural groundwater levels.
- 10 If the irrigation system is used to distribute diluted effluent, fertilizer or added contaminants

the consent holder shall ensure:

- a. An effective backflow prevention device is installed and operated within the pump outlet plumbing or within the mainline to prevent the backflow of contaminants into the water source;
- b. The backflow prevention device is tested at the time of installation and annually thereafter by a suitably qualified or certified person in accordance with Canterbury Regional Council approved test methods for the device used; and
- c. The test report is provided to the Canterbury Regional Council Attention: RMA Compliance and Enforcement Manager within two weeks of each inspection.

Advisory note:

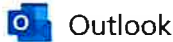
This condition does not authorise the distribution of effluent or fertiliser as this is subject to separate consent requirements pursuant to s15 of the RMA.

- 11 The Canterbury Regional Council may, once per year, on any of the last five working days of May or November, serve notice of its intention to review the conditions of this consent for the purposes of dealing with any adverse effect on the environment which may arise from the exercise of the consent and which it is appropriate to deal with at a later stage.
- 12 The lapsing date for the purposes of section 125 shall be 31 December 2016.

Issued at Christchurch on 27 October 2022

Canterbury Regional Council

Appendix B: ECan Pre-application Advice



RE: RMA260534 - Pre-Application Resource Consent Form [#2832] - Follow up

From Jeremy Ecker <Jeremy.Ecker@ecan.govt.nz>
Date Mon 8/11/2025 1:13 PM
To Richard Bowman <richard.bowman@midlands.co.nz>
Cc Rose Edkins <r.edkins@aqualinc.co.nz>

You don't often get email from jeremy.ecker@ecan.govt.nz. [Learn why this is important](#)

Hi Richard,

Have queried the below with principal Planners and our legal team to get their opinions and advice. I have attached this below in italics, with my own advice going forward for pathways of office use. But in short you cannot use your current consent CRC232183 water supply to the purposes of water supply to an office.

"The applicant holds resource consent to take GW granted in 2011 under the proposed Natural Resources Regional Plan (NRRP). It was just a take of water as the use for irrigation met all Permitted Activity (PA) rules. The LWRP later came into effect requiring consent for irrigation but the applicant did not seek this under section 20A of the Resource Management Act 1991.

They now want to use the water take for office supply. The zone is overallocated.

*The GW take consent can only be used for irrigation. Because irrigation was a permitted activity there was no assessment of effects re irrigation at that point in time but that was the basis of the application and **scope of the consent granted**.*

Once the new LWRP rules no longer provided for irrigation as a PA the consent holder should have applied for a use consent for the irrigation (s20A RMA) – to allow the assessment of those effects, and they already had priority in the take from the existing consent; that water was essentially allocated to them for irrigation already.

At this point they can still apply for the use aspect for irrigation and have the take consent available/priority in the water as it was a take for irrigation.

For office supply the existing take consent is not able to be used; that will require a new take and use consent or it needs to meet the permitted activity rules (in this case not using the bore water for the irrigation consent but instead using it for office supply). This is because the consent as granted was still for irrigation, even if a take only was granted."

Therefore, the current pathways for office supply would be as outlined below.

Pathway 1 – Take and use water for office supply within the permitted activity limits of LWRP Rule 5.114 assuming that the Bore is located more than 20m from the property boundary/surface water body.

5.114 The taking and using of less than 5 L/s and more than 10 m³ but less than 100 m³ per property per day of groundwater on a property more than 20ha in area is a permitted activity, provided the following conditions are complied with:

- 1. The bore is located more than 20 m from the property boundary or any surface waterbody.**

Doing this pathway you cannot use/exercise your consent CRC232183 on the same day (as taking from same Bore K37/0836). The steps would be to install or add in pipes to take water from the existing infrastructure to then take water within the permitted activity limits of rule 5.114 (less than 5l/s and more than 10m³ but less than 100m³ per day) provided this allows enough water demand for the office supply.

This is by far the easiest option if the conditions and limits of the rule above can be complied with. Just make sure are not exercising it concurrently with your consent CRC232183 for irrigation (i.e. exercise every second take or maybe only once a week if needed) – Can take this water and store it in storage tanks for better efficiency and use it for office supply. Depending on your demand of water you may only need to do this once a week or less and then can continue irrigating with CRC232183 on the other days you aren't using it.

Pathway 2 – Permanent Consent

As the Groundwater allocation zone is overallocated no new water can be applied for this new take and use of water and as stated above by legal and principal consent planners. The additional use of office supply cannot be utilised by your current consent.

The transfer of take and use of water would need to be from another consent within the same Groundwater allocation zone that has the use of water being "office supply" and apply with the conditions of the below rule. The new consent to take and use the water from this transfer would need to assess the stream depletion effects (if any) and well interference and new effects of this new consent to take and use water for office supply. Also, if using the same bore (K37/0836) as CRC232183 then would need to install a separate water meter for the two consents.

13.5.32 The temporary or permanent transfer, in whole or in part, (other than to the new owner of the site to which the take and use of water relates and where the location of the take and use of water does not change) of a water permit to take or use surface water or groundwater within the Hinds/Hekeao Plains Area, is to be considered as if it is a restricted discretionary activity, provided the following conditions are met:

1. The reliability of supply for any other lawfully established water take is not reduced; and
2. In the case of surface water;
 - a. the point of take remains within the same surface water catchment and the take complies with the minimum flow and restriction regime in Tables 13(d) and 13(e); and
 - b. 50 percent of the volume of transferred water is to be surrendered; or
3. In the case of groundwater:
 - a. the point of take is within the same groundwater allocation zone or combined surface and groundwater allocation zone; and
 - b. the bore interference effects as set out in Schedule 12 are acceptable; and
 - c. in addition for stream depleting groundwater takes:
 - (i) the transfer is within the same surface water catchment; and
 - (ii) the take complies with the minimum flow and restriction regime in Table 13(d) and 13(e); and
 - (iii) the stream depletion effect is no greater in the transferred location than in the original location, unless at least an equivalent volume of surface water allocation from the affected water body can be surrendered alongside the transfer, for at least the duration of the transferred take; and
 - d. If the transfer is within the Valetta Groundwater Allocation Zone, 50 percent of the volume of transferred water is to be surrendered.

Let me know if you need any further advice.

Best regards,
Jeremy

Annexure C: FENZ Response

David Harford

From: Geddes, Don <don.geddes@fireandemergency.nz>
Sent: Thursday, 3 July 2025 4:28 pm
To: David Harford
Subject: RE: Midland Properties Ltd - Racecourse Road Ashburton Proposed Development-FENZ

Hi David

Thanks for your enquiry regarding Midland Seeds new property at the corner of Racecourse Rd and Methven Highway.

From our (Fire and Emergency NZ) perspective, the Firefighting Water Supplies Code of Practice is a recommended best practice document. The Ashburton District Council has decided to make it mandatory within their District Plan.

As you probably know, for buildings in rural areas the COP recommendation for minimum water quantity is 45,000 lt with suitable couplings, along with a few other requirements relating to siting, adjacent to hard standing etc. The intent of the COP is to have sufficient water available for 30 minutes firefighting.

When assessing rural sites we take several factors into account such as the response time for the nearest attending brigade and also the availability of nearby water sources and exposures at risk if either of your buildings should catch fire.

The minimum recommendation in the COP is for 45,000 lt of water which would require you to have at least two tanks on site (max available tank size is 30,000 lt), but with Ashburton Brigade arriving with approximately 18,000 lt, and a good water source in the race directly across Racecourse Rd from the site, we believe it would be adequate for you to provide a single 30,000 lt tank, while also meeting the other conditions regarding siting, couplings etc.

Happy to discuss this further if you feel the need.

Regards
Don

Don Geddes
Senior Advisor Risk Reduction
Mid-South Canterbury District
275 Havelock Street Ashburton

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Email: don.geddes@fireandemergency.nz



From: David Harford <david@dhconsulting.co.nz>
Sent: Monday, June 23, 2025 12:22 PM

To: Geddes, Don <don.geddes@fireandemergency.nz>

Subject: Midland Properties Ltd - Racecourse Road Ashburton Proposed Development-FENZ

You don't often get email from david@dhconsulting.co.nz. [Learn why this is important](#)

Hi Don

Hope you are well.

I have been working with Midlands on a resource consent application to ADC to relocate, establish and operate Midlands research and administration facilities on the corner of Racecourse Road and State Highway 77. This is an 8ha site. I attach some plans to show the proposed layout etc.

The application is undergoing public notification at the moment.

I anticipate part of the requirements will be provision for on-site firefighting ability. There is no reticulation of water to this site so on-site storage is the likely requirement.

I attach plans which shows the site layout.

What would be the FENZ requirement for this site?

The District Plan has Fire Fighting requirements for subdivision (in italics below) however there is no subdivision with this application so a consent notice cant be imposed. It could be the FENZ requirements are a recommended condition of the consent should it be granted.

Council recognises the New Zealand Fire Service Code of Practise for Firefighting Water Supplies. All new allotments, other than allotments for access, roads and utilities, in all zones shall be provided with firefighting water supply and access to this supply that complies with the New Zealand Fire Service Firefighting Water Supplies Code of Practise.

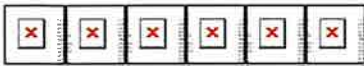
• In order to alert future developers of the requirement for a firefighting water supply, where a firefighting water supply does not exist, a consent notice requiring a firefighting water supply shall be put in place on new certificates of title.

The following is an example of a typical consent notice:

“Any habitable building constructed on Lot X shall be provided with a fire fighting water supply and access to this supply that complies with the New Zealand Fire Service Firefighting Water Supplies Code of Practise.”

Kind Regards

David Harford
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Annexure D: Vehicle Crossing Design



Midlands Properties Ltd

Racecourse Road

Allenton, Ashburton

Racecourse Road Entrance - Concept



Scale:	A3	ILC Job No:	14004	Drawing No:	003	Revision No:	B	Revision Date:	5/8/2025	Drawn By:	CH
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Original Issue: New Zealand Version Datum 2016. Drawn: 2025 05/08 Dimensions in metres unless otherwise stated

Annexure E: Site Plan showing future buildings

