

From: [Brad Edwards](#)
To: [Tony Preston](#)
Subject: FW: another Fast Track one for feedback: FW: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage
Date: Monday, 5 May 2025 4:13:34 pm
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.jpg](#)
[256.01 - response-ANON-URZ4-5FQ1-J.pdf](#)
[256.02 - Klondyke Storage records of title.pdf](#)
[image008.jpg](#)
Attachments 256.01 and 256.02 are publicly available on Ministry for the Environment Website

Importance: High

From: Brad Edwards
Sent: Wednesday, 19 June 2024 9:01 am
To: Chris Coulter <ccoulter@doc.govt.nz>
Subject: FW: another Fast Track one for feedback: FW: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage
Importance: High

Chris, I have looked at this Fast Track application and have some quick thoughts that may be of use- some of these may be out of scope but I think its better during this brain storming collaborative process I throw all the ideas into the ring;

- The application does not provide much specific detail. There is not even a good site map and a very general summary of activities or mitigations they expect covered. This makes assessment of impacts difficult.

Values identified:

- Main Rakitata Awa braid plain cultural and ecological values. (possibly?)
- Lizard habitat in rock piles and stonefield/grasslands within the development footprint.
- Probably the odd scattered native plant within a highly developed pastoral farming environment- may include the odd matagouri, Melocytus, te kouka, coprosmas, pittosporum. I have not walked over this land.
- Existing public access to main riverbed appears to run through the stage 3 development area.

Explanataion:

- This application uses existing water consents held by the businesses associated with the RDR, but the practical implication of this development is that it may increase water harvesting from the Rakitata- if filling the 52million

m3 dam comes from any unutilised portion of the existing water consents. This is not specified by the applicant, but the possible impact of further water takes on the cultural and ecological values of the wider Rakitata Awa are a possible practical outcome.

- Increased water availability will increase farming intensity on the mid Canterbury plains. If portions of the water taken are used for environmental enhancement we are likely to see a slaving of the Rakitata to environmental protection across the plains at the cost of river values that would be difficult to . It is likely this application is preparatory to the development of Managed Aquifer Recharge given I understand applications are underway to transfer stock and human use water consents to include MAR activities.
- ADC have already issued consent LU16/0067 which appears to cover the development. No explanation on any shortfall within the existing consent is provided except that it isn't fit for purpose.
- It appears the applicant is seeking for required mitigations within this consent LU16/0067 to be either removed or delayed in implementation. Despite the applicants explanation that this is because they have changed to a staged implementation of development the existing consent already has specific clauses about moving development to a staged implementation (ie. That mitigations are undertaken at the earliest development stages).
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translocation and monitoring are included.

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Other authorities that DOC may be party too:

- Wildlife authority to translocate lizards.

Treaty Settlements:

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Brad Edwards

Ranger River Restoration | Kanorau Kotara
Department of Conservation | Te Papa Atawhai

9(2)(a) www.doc.govt.nz



From: Tony Preston <tpreston@doc.govt.nz>

Sent: Monday, June 17, 2024 1:23 PM

To: Chris Coulter <ccoulter@doc.govt.nz>; Brad Edwards <bedwards@doc.govt.nz>

Cc: Janine Sidery <jsidery@doc.govt.nz>

Subject: FW: another Fast Track one for feedback: FW: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage

Importance: High

Kia ora korua

Could I please ask that both of you work together in the next couple of days to provide me with advise on what our response will be to this one.

Could you please provide comment on:

- whether the project requires any other DOC-related approvals
- if you are aware of any Treaty settlement matters which relate to the project site – such as local protocols
- any other relevant matter?

Please have your draft advice back to me by 11am this thursdasy

Ngā mihi

Tony

From: Janine Sidery <jsidery@doc.govt.nz>

Sent: Monday, June 17, 2024 12:25 PM

To: Tony Preston <tpreston@doc.govt.nz>

Cc: Meredith Lawry <mlawry@doc.govt.nz>

Subject: another Fast Track one for feedback: FW: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage

Importance: High

Hi Tony

Are your team able to provide the feedback on this one by midday 20th ? Sing out if need any support.

Thanks heaps

Janine

From: Meredith Lawry <mlawry@doc.govt.nz>

Sent: Monday, June 17, 2024 12:20 PM

To: Janine Sidery <jsidery@doc.govt.nz>

Cc: Jo Macpherson <jmacpherson@doc.govt.nz>; Neil Deans <ndeans@doc.govt.nz>

Subject: FW: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage

Kia ora Janine,

As below and attached, we have received a request to look at eligibility of this project in Ashburton.

Could your team help with advising if any PCL would be affected, whether any DOC-related approvals (eg freshwater fisheries, Wildlife Act) would be needed, any relevant Treaty settlement matters, and anything else that you consider we should advise MfE of?

It would be fantastic if you could provide any advice by midday 20 June.

Thank you,
Meredith

From: Listed Projects <ListedProjects@mfe.govt.nz>

Sent: Monday, June 17, 2024 12:08 PM

To: Neil Deans <ndeans@doc.govt.nz>; Meredith Lawry <mlawry@doc.govt.nz>

Cc: Karen Sannazzaro <Karen.Sannazzaro@mfe.govt.nz>

Subject: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage

Kia ora Neil and Meredith

This listed project application is for FTA256 - Klondyke Storage.

-

The project has triggered your criteria for consultation.

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- if you are aware of anything that would render the project ineligible under clause 18 of the Bill
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- any other relevant matter?

If possible, could you please provide your feedback by COB 20 June 2024

Please let me know if there is anything I can do to assist.

Ngā mihi nui
MfE Listed Projects team



From: [Chris Coulter](#)
 To: [Janine Skerry](#)
 Subject: FW: another Fast Track one for feedback: FW: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage
 Date: Wednesday, 19 June 2024 10:05:33 am
 Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.jpg](#)

Hi Janine,

Fast track completed. As you'll see below Tony has seen this and asked me to forward on to you. Also as noted by me Brad did a very comprehensive assessment and will be more than you require but will leave it with you as to what needs to go forward.

Chris

Chris Coulter | Senior Ranger Community
 Department of Conservation | Geraldine District Office
 North Terrace | PO Box 33 | Geraldine 7930
 9(2)(a)
www.doc.govt.nz

image001.jpg

From: Tony Preston <tpreston@doc.govt.nz>
 Sent: Wednesday, June 19, 2024 9:57 AM
 To: Chris Coulter <ccoulter@doc.govt.nz>
 Subject: RE: another Fast Track one for feedback: FW: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage

Good stuff thanks Chris

Yes pass onto Janine as is and she can filter as necessary

Ngā mihi

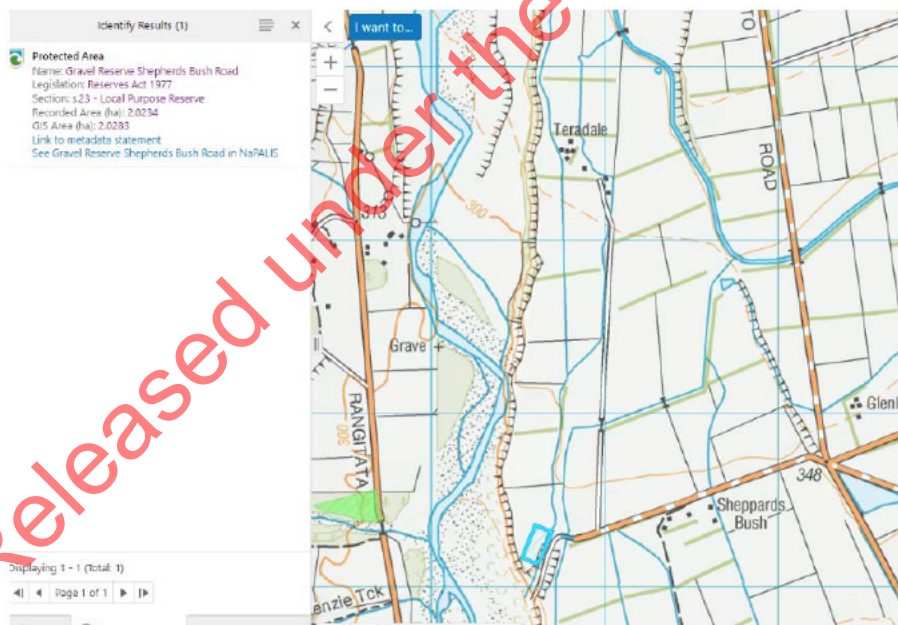
Tony

From: Chris Coulter <ccoulter@doc.govt.nz>
 Sent: Wednesday, June 19, 2024 9:42 AM
 To: Tony Preston <tpreston@doc.govt.nz>
 Subject: RE: another Fast Track one for feedback: FW: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage
 Importance: High

Hi Tony

Brad and I have worked on this request and Brad has provided quite a bit of comment on this. As he mentions, it could be more than what is being looked for at the moment but I am going to send it on and Janine can decide what is required.

There is only one tiny piece of pcd in the vicinity of Sheppards Bush Road and it's a gravel reserve Vested to Ashburton District Council.



Brad Edwards assessment

I have looked at this Fast Track application and have some quick thoughts that may be of use- some of these may be out of scope but I think it's better during this brainstorming collaborative process I throw all the ideas into the ring;

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Brad Edwards

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Chris

Chris Coulter | Senior Ranger Community
Department of Conservation | Geraldine District Office
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Ph: 9(2)(a)
www.doc.govt.nz

image001.jpg



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Ngā mihi

Tony

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To: Tony Preston <tpreston@doc.govt.nz>
Cc: Meredith Lawry <mlawry@doc.govt.nz>
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Thanks heaps

Janine

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Kia ora Janine,

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Thank you,
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Sent: Monday, June 17, 2024 12:08 PM
To: Neil Deans <ndeans@doc.govt.nz>; Meredith Lawry <mlawry@doc.govt.nz>
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If possible, could you please provide your feedback by COB 20 June 2024

Please let me know if there is anything I can do to assist.

Ngā mihi nui

MfE Listed Projects team



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Yes happy with that Janine
Thanks all for a great job and quick turnaround

Ngā mihi
Tony

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Kia ora Tony

Thanks for the work that Chris and Brad have put into this.

As we have been asked to comment on:

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- if you are aware of any Treaty settlement matters which relate to the project site – such as local protocols
- any other relevant matter?

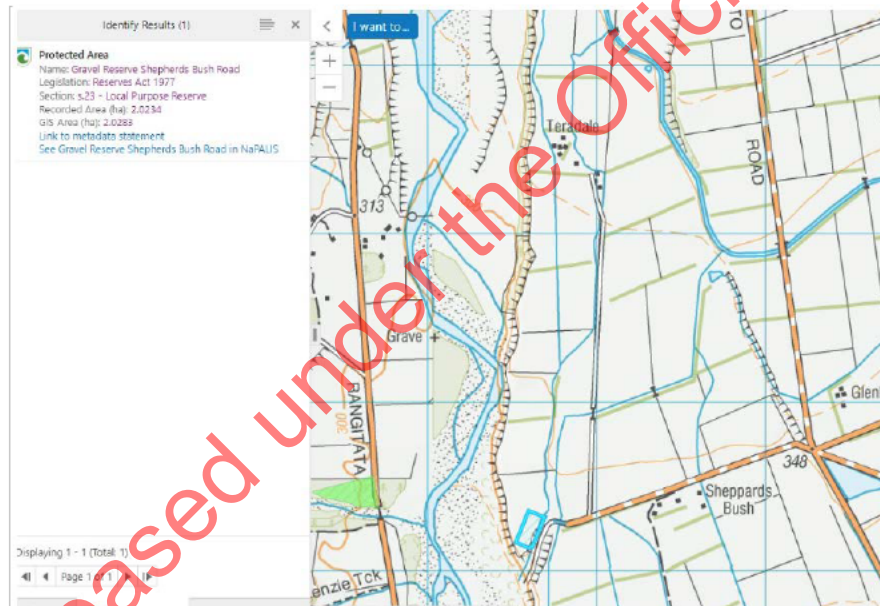
I propose that our feedback is sent as below (basically I have reordered it to reflect the bullet points.)

Let me know if you are happy with this. If I don't hear from you before 11am I will send onto Meredith as is.

Many thanks

PCL

There is one tiny piece of pcl in the vicinity of Sheppards Bush Road and it's a gravel reserve Vested to Ashburton District Council.



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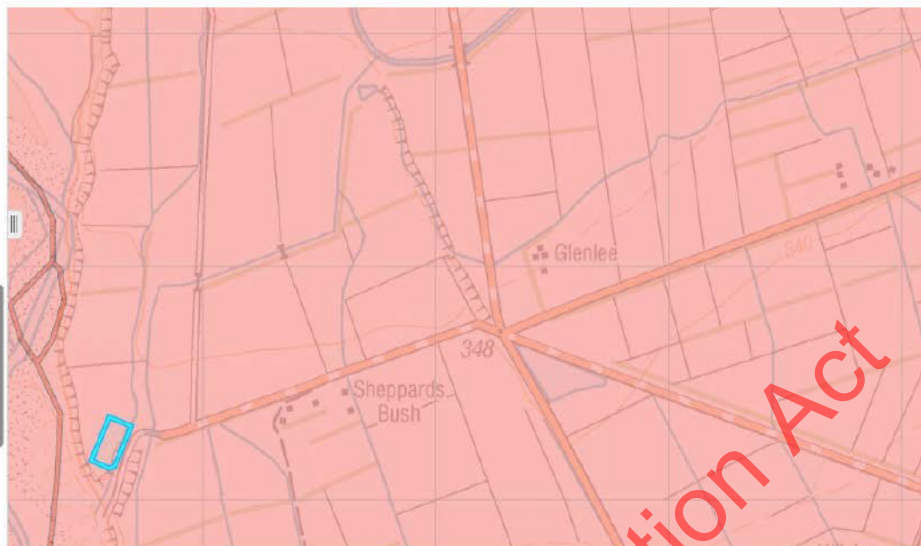
- ☐ Freshwater Environments (FENZ)
- ☐ Nga Whenua Rahui Kawenata
- ☐ QEII Covenants
- ☐ Maori Land Court

☒ Treaty Settlements

- ☐ Commercial Redress
- ☐ Cultural Redress
- ☐ Deed of Recognition
- ☐ Site Specific Agreement
- ☒ Statutory Acknowledgement
- ☒ Right of First Refusal
- ☒ Protocol Areas
- ☐ Other Treaty Claim Types

☒ NaPALIS

- ☒ Public Conservation Land
- ☒ All Protected Areas
- ☐ Overlays



Other comments:

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Cc: Karen Sannazzaro <Karen.Sannazzaro@mfe.govt.nz>
Subject: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage

Kia ora Neil and Meredith

This listed project application is for FTA256 - Klondyke Storage.

-

The project has triggered your criteria for consultation.

Could you please provide comment on:

- whether the project requires any other DOC-related approvals
- if you are aware of anything that would render the project ineligible under clause 18 of the Bill
- if you are aware of any Treaty settlement matters which relate to the project site – such as local protocols
- any other relevant matter?

If possible, could you please provide your feedback by COB 20 June 2024

Please let me know if there is anything I can do to assist.

Ngā mihi nui
MfE Listed Projects team



From: [Meredith Lawry](#)
To: [Janine Sidery](#)
Cc: [Tony Preston](#); [Chris Coulter](#); [Brad Edwards](#); [Jo Macpherson](#)
Subject: RE: Feedback on FTA256 - Klondyke Storage
Date: Wednesday, 19 June 2024 4:18:47 pm
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.jpg](#)

Fantastic, thank you all for this

From: Janine Sidery <jsidery@doc.govt.nz>
Sent: Wednesday, June 19, 2024 4:14 PM
To: Meredith Lawry <mlawry@doc.govt.nz>
Cc: Tony Preston <tpreston@doc.govt.nz>; Chris Coulter <ccoulter@doc.govt.nz>; Brad Edwards <bedwards@doc.govt.nz>; Jo Macpherson <jmacpherson@doc.govt.nz>
Subject: Feedback on FTA256 - Klondyke Storage

Kia ora Meredith

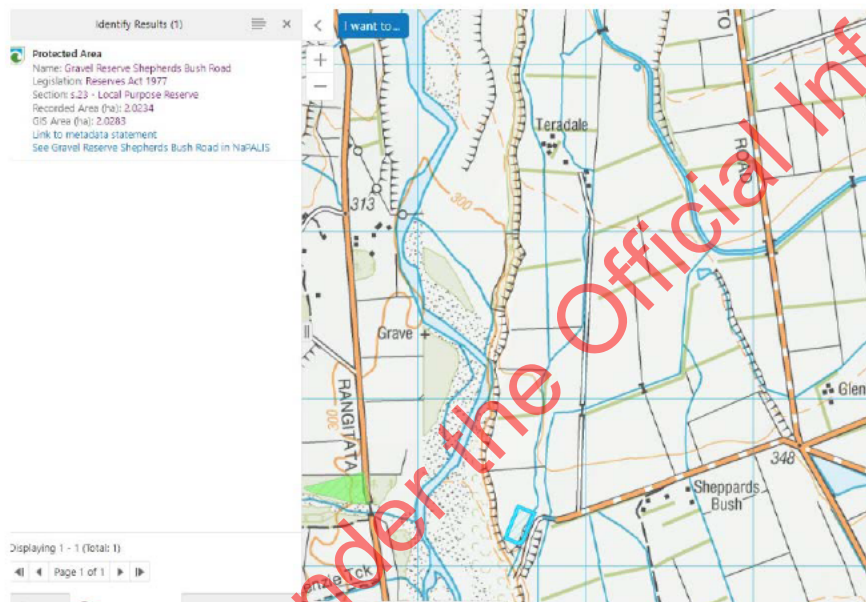
Here is the work undertaken by the Geraldine Team on this proposal.

Many thanks to the team for turning this around and the level of detail they have provided.

Ngā mihi
Janine

PCL

There is one tiny piece of pcl in the vicinity of Sheppards Bush Road and it's a gravel reserve Vested to Ashburton District Council.



Other authorities that DOC may be party too:

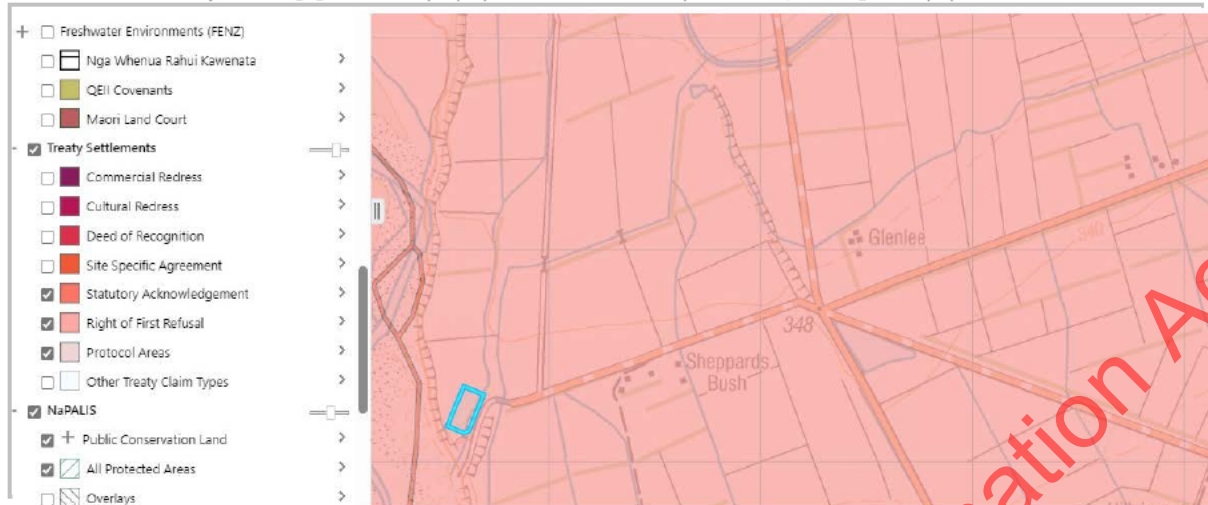
- Wildlife authority to translocate lizards.

Treaty Settlements:

The Runaka o Arowhenua are central to a collaboration of Manawhenua and six government agencies with various responsibilities for the Rakitata. They are committed to the wellbeing of the river and the community connected to it, and we are committed to the development and implementation of a restoration strategy.

I have also snipped the area in GIS and this shows the area under Treaty Settlement with Statutory Acknowledgement, Right of First Refusal and Protocol Area.

- Immediately adjacent to the development site lies the riverbed of the Rakitata Awa. The Ngāi Tahu Claims Settlement Act grants a Deed of Recognition and Statutory Acknowledgement that requires consent authorities to give regard of the association of Ngāi Tahu manawhenua. Manawhenua, Te Rūnaka o Arowhenua, hold considerable knowledge of whakapapa, traditional trails and tauranga waka, places for gathering kai and other taonga, including ways in which to sustainably use the resources of the river by acknowledging the relationship of people with the river and their dependence on it, and tikanga for the proper utilisation of resources.



Other comments:

- The application does not provide much specific detail. There is not even a good site map and a very general summary of activities or mitigations they expect covered. This makes assessment of impacts difficult.

Values identified:

- Main Rakitata Awa braid plain cultural and ecological values. (possibly?)
- Lizard habitat in rock piles and stonefield/grasslands within the development footprint.
- Probably the odd scattered native plant within a highly developed pastoral farming environment- may include the odd matagouri, Melicytus, te kouka, coprosma, pittosporum. I have not walked over this land.
- Existing public access to main riverbed appears to run through the stage 3 development area.

Explanation:

- This application uses existing water consents held by the businesses associated with the RDR, but the practical implication of this development is that it may increase water harvesting from the Rakitata- if filling the 52million m3 dam comes from any unutilised portion of the existing water consents. This is not specified by the applicant, but the possible impact of further water takes on the cultural and ecological values of the wider Rakitata Awa are a possible practical outcome.
- Increased water availability will increase farming intensity on the mid Canterbury plains. If portions of the water taken are used for environmental enhancement, we are likely to see a slaving of the Rakitata to environmental protection across the plains at the cost of river values that would be difficult to . It is likely this application is preparatory to the development of Managed Aquifer Recharge given I understand applications are underway to transfer stock and human use water consents to include MAR activities.
- ADC have already issued consent LU16/0067 which appears to cover the development. No explanation on any shortfall within the existing consent is provided except that it isn't fit for purpose.
- It appears the applicant is seeking for required mitigations within this consent LU16/0067 to be either removed or delayed in implementation. Despite the applicant's explanation that this is because they have changed to a staged implementation of development the existing consent already has specific clauses about moving development to a staged implementation (ie. That mitigations are undertaken at the earliest development stages).
- The applicant does not specify which consent mitigations they expect to have removed except that these will be those conditions pertaining to a withdrawn water take extension. Specifically, mitigations around the creation of wetland, pond, fish refuge, shingle bird island from consent LU16/0067 are no longer mentioned and are presumed as removed? And the remaining mitigations seem to be reptile translocation and native planting areas.
- Within the footprint of works conservation values likely to be limited to reptile impacts as existing boulder fields are destroyed, of particular interest- Southern Grass Skink (clade 5 -at risk/declining). Five lizard species have been found on the south side of the Rangitata below the Rangitata Gorge within the last 15 years. The stony dry flood plains of the Rangitata where they were not completely changed and especially the dry river bed of the South Branch of the Rangitata had populations of the Southern grass skink Oligosoma polychroma Clade 5 (At Risk-Declining) until in recent times. However, even those few populations have been reduced through developments in connection with the establishment of the South Rangitata Irrigation Scheme and the modification of the South Branch of the Rangitata. Only a few remnants remain today. (Franks. H. 2021)
- The existing mitigations required by consent LU16/0067 include the establishment of a surrogate lizard habitat before removal of rock piles within the development area. Complimentary maintenance, weed control, translocation and monitoring are included.
- The applicant has not prioritised lizard mitigation works until the 3rd and final development stage (est to be mid 2030's) because that is when the existing habitat would be impacted. It is suggested here that any translocation is likely to be timely and require new habitat bedding in and a slow removal of the old habitation site. My recommendation is this process begins as a stage 1 implementation.
- Alternative public access to the main stem of the Rakitata will need to be developed.

From: Tony Preston <tpreston@doc.govt.nz>
 Sent: Monday, June 17, 2024 1:23 PM
 To: Chris Coulter <ccoulter@doc.govt.nz>; Brad Edwards <bbedwards@doc.govt.nz>
 Cc: Janine Sidery <jsidery@doc.govt.nz>
 Subject: FW: another Fast Track one for feedback: FW: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage
 Importance: High

Kia ora korua

- whether the project requires any other DOC-related approvals
- if you are aware of any Treaty settlement matters which relate to the project site – such as local protocols
- any other relevant matter?

Could I please ask that both of you work together in the next couple of days to provide me with advise on what our response will be to this one.
Could you please provide comment on:

Please have your draft advice back to me by 11am this thursdasy
Ngā mihi
Tony

From: Janine Sidery <jsidery@doc.govt.nz>
Sent: Monday, June 17, 2024 12:25 PM
To: Tony Preston <tpreston@doc.govt.nz>
Cc: Meredith Lawry <mlawry@doc.govt.nz>
Subject: another Fast Track one for feedback: FW: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage
Importance: High

Hi Tony

Are your team able to provide the feedback on this one by midday 20th ? Sing out if need any support.

Thanks heaps

Janine

From: Meredith Lawry <mlawry@doc.govt.nz>
Sent: Monday, June 17, 2024 12:20 PM
To: Janine Sidery <jsidery@doc.govt.nz>
Cc: Jo Macpherson <jmacpherson@doc.govt.nz>; Neil Deans <ndeans@doc.govt.nz>
Subject: FW: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage

Kia ora Janine,

As below and attached, we have received a request to look at eligibility of this project in Ashburton.

Could your team help with advising if any PCL would be affected, whether any DOC-related approvals (eg freshwater fisheries, Wildlife Act) would be needed, any relevant Treaty settlement matters, and anything else that you consider we should advise MFE of?

It would be fantastic if you could provide any advice by midday 20 June.

Thank you,
Meredith

From: Listed Projects <ListedProjects@mfe.govt.nz>
Sent: Monday, June 17, 2024 12:08 PM
To: Neil Deans <ndeans@doc.govt.nz>; Meredith Lawry <mlawry@doc.govt.nz>
Cc: Karen Sannazzaro <Karen.Sannazzaro@mfe.govt.nz>
Subject: [COMMERCIAL]Feedback on FTA256 - Klondyke Storage

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Ngā mihi nui
MfE Listed Projects team

