

Our Reference: A1518841

File: RM18.004

25 August 2021

Pioneer Energy Limited
C/- Will Nicolson
LandPro
13 Pinot Noir Drive
Cromwell 9342

Via email to: will@landpro.co.nz

Dear Sir

Request for further information under section 92(1) of the Resource Management Act 1991 (the Act) – Consent Application Number RM18.004

An audit of your application and the further information provided to date has been made by ORC staff and Dr Kay Booth for R and R Consulting Limited. Dr Kay Booth has provided a recreational amenity technical audit on behalf of Council. As previously noted, we have also received technical reviews and audits from Mark James at Aquatic Environmental Sciences Limited (lake ecology) and Babbage Consulting Limited (river and wetlands ecology and hydrology). To be able to make a full assessment of the recreational amenity and cultural effects of the application, we request the following information under section 92(1) of the Resource Management Act (the Act).

Recreational and Visual Amenity Values

The application includes limited specific information on the location of key recreational activities and how the proposed change will specifically affect these key recreational users. The significant recreational activity is trout fishing with associated boating

1. The Lake Onslow lakeshore is variable in substrate composition and gradient meaning that substrate and lakebed exposure will differ in extent around the lake edges with changes in water levels (Dungey, R 2017 – *Lake Onslow Lake Bed Profile and Invertebrate Study*). Access and use of the lakeshore by recreational users are also understood to be variable with limited access in some locations. The potential for increased erosion and land instability of the lakeshore is also variable. Please provide plans, diagrams and/or maps (overlain maps) that clearly illustrate and reflect this variability around the Lake Onslow lakeshore and that highlight the locations of high use and high erosion/land instability potential.
2. Please identify and illustrate via plans or other means the locations around Lake Onslow that have key amenity and cultural values. This may include public access locations, walking locations, key angling locations including identification of the specific type of angling (foot, boat), mahikia kai locations. It would be helpful to have a recognised gradient of use e.g., different colours or shading for high use, moderate use, low use areas and the point source identification of sites (e.g., waahi taoka sites), if that is relevant
3. Please clearly describe and quantify (where possible) how the change in the rate of drawdown may affect the lakeshore at different locations around Lake

Onslow focusing, but not limited to, the locations identified as moderate-high value for amenity and cultural reasons. The assessment should consider, but is not limited to, the horizontal distance of lakeshore that may be exposed, the nature of the substrate, the extent of mudflats at different lake levels, the potential for increased erosion or land instability, the changes in deep water passage, dust generation and changes in visual amenity. Consideration should also be given to the time of year when the drawdown is likely to occur and the likely recreational uses/weather conditions at this time. Overlain maps may help to illustrate some of the changes.

4. Provide a recreational assessment of the effect the changes will have on key amenity values being fishing/angling, boating and use of the lakeshore for camping/walking and any other recreational activities pursued at Lake Onslow or on/near the Teviot River. The recreational assessment should address the following:
 - a. Identifies the key recreational activity locations including fishing, boating, walking and camping in and around Lake Onslow and the Teviot River including access points.
 - b. Assesses the effects to recreation values from the proposed change on access to the lake (by foot and boat).
 - c. Assesses the effects to lake channels for boating from the proposed change including safety implications from boat stranding.
 - d. Identifies the effects of the proposed change to the mudflat extent at different lake levels on recreational access and use. Considers how this relates to key walking and angling locations.
 - e. Assesses the effects of the proposed changes on public access to Lake Onslow including any supporting evidence on the duration between lake level drop and the mudflats being safely accessible for public access.
 - f. Assesses the implications for recreational access and use from the information provided on the potential for increased erosion and land instability of the lakeshore.
 - g. Assesses the effects on recreational users from any increased potential for dust generation from the proposed change.

Cultural values

There is currently insufficient information within the Application to determine the significance of the cultural values at the sites that may be affected by the proposed change and exactly how, or if, the change will affect these values. We appreciate that any cultural assessment and advice needs to involve the rūnaka who have a cultural association with Lake Onslow and the Teviot River. The below questions could be answered and assessed via the provision of a formalised cultural impact assessment (CIA) that has been prepared by persons who have mana whenua. Alternatively, further consultation with the local rūnaka via Aukaha may enable the below to be sufficiently answered.

6. Provide a cultural impact assessment or evidence of consultation that identifies and addresses the following:
 - a. The presence, extent and importance of mahika kai (flora and fauna) gathering historically and currently at or near Lake Onslow and within the Teviot River.
 - b. The presence, extent, location and importance of waahi taoka at Lake Onslow and within or near the Teviot River.
 - c. Assesses the effect of the proposed change on these identified values including the activity of mahika kai gathering. This includes the practical effects the change may have on this practice and the experiential effects including visual amenity, if this is relevant.

- d. Assesses whether the proposal protects important sites and values of cultural significance.

In accordance with section 92A of the Act, please respond within 15 working days from the date of this letter (**15 September 2021**) with one of the following:

1. The information requested above; or
2. Written advice that you agree to provide the information, and the date by which you intend to provide it; or
3. Written advice that you refuse to provide the requested information.

Please note that the Act requires Council to publicly notify your application if you do not provide the requested information before the due date (or an agreed alternative date), or if you refuse to provide the information. It is, therefore, important that you contact us promptly to discuss an alternative timeframe if you are unable to provide the information by the due date.

Please note that if the information you provide raises more questions, your application will remain on hold until sufficient information has been provided to enable processing to continue.

If you have any further queries, please contact me on (03) 474 0827 or 0800 474 082.

Yours sincerely,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Natasha Pritchard
Principal Consents Officer