



# TE AO MĀRAMA INC.

22 October 2024

Environment Southland Catchment Operations Team  
C/-o C P Thomsen  
Fletcher Vautier Moore  
Email: [cthomsen@fvm.co.nz](mailto:cthomsen@fvm.co.nz)

Tēna koe,

## **Attention: Chris Thomsen – Titiroa Flood Gates amended proposal**

### Response to amended proposal

1. At the hearing on 30 August 2024, we provided evidence that outlined our concerns were regarding:
  - a. The structure having significant effects on fish passage.
  - b. The development of land that is unsuitable for agriculture.
  - c. The structure being detrimental to the mauri, the freshwater ecosystems and the surrounding flood plain of the Titiroa Awa.
  - d. The applications fails to consider climate change and the impacts of rising sea level, increased flood flows on the area and a need to repurpose land.
  - e. The application is inconsistent with Te Tangi a Taurira, 2008.
  - f. We consider that the effects on frameworks and cultural values are significant, particularly ki uta ki tai, rangatiratanga and mauri.
2. The applicant proposed changes to the application immediately prior to the hearing and submitters requested further information and time on this proposed change. Minute 1 from the commissioner directed further work to be undertaken by the

applicant and its experts. We appreciate that we have had further time to consider this proposal.

3. We wish to acknowledge the amended proposal provided by Environment Southland Catchment Operations Team dated 16 October 2024.
4. The amended proposal includes:
  - a. Installing a letterbox in the centre grate to allow for fish passage when the gates are closed.
  - b. Reducing the consent duration to five years.
  - c. Proposed monitoring programme to provide some insight into the use of letterboxes on tide gates
  - d. Cultural monitoring undertaken to inform local rūnanga during decision making and improve engagement between ngā rūnanga and council.
5. The position of Awarua Rūnanga has not changed because of the letterbox proposal. While the letterbox proposal may be an improvement to what is currently there, it is our understanding that these are not best practice. Our position is that the gates should be removed to enhance the mauri and life supporting capacity of the Titiroa River. However, should the commissioner consider that land drainage is a functional need we have provided comments below on the proposal and are open to having further conversations with the applicant.
6. We are concerned with the limitations around the data set used for the model. We think that further work is needed to confirm the amount of land that would be affected by the removal of the gates.
7. We don't have sufficient information surrounding fish passage through the letterbox proposal. We note that Dr. Cindy Baker was contacted about proposed changes to the current structure for kanakana, but we are unclear if she has provided advice to this proposal or if other species swimming abilities were considered particularly in regard to velocities. Further information is needed on this.

8. We would need to provide comments on proposed consent conditions once they have been refined to reflect the current proposal.
9. Just to clarify that our position has not changed and we still prefer that the structures are removed from the river.

Nāhaku noa nā,

Stevie-Rae Blair  
Te Ao Mārama Inc

CC:  
Awarua Rūnanga  
Department of Conservation  
Southland Fish and Game



