

140 Charlton Road, Gore 9774  
Waea: 03 2087954



***Form 13 Submission on application concerning resource consent or  
esplanade strip that is subject to public notification or limited notification  
by consent authority***

*Sections [41D](#), [95A](#), [95B](#), [95C](#), [96](#), [127\(3\)](#), [136\(4\)](#), [137\(5\)\(c\)](#), and [234\(4\)](#), Resource Management Act 1991*

**To:** Environment Southland [Southland Regional Council]

**Name of submitter:** Hokonui Rūnanga Kaupapa Taiao on behalf of Hokonui Rūnanga Inc

**This is a submission on an application from:** Southland District Council – APP 20232970 for a resource consent to discharge treated wastewater from the Edendale-Wyndham wastewater treatment plant into the Mataura River at the Edendale-Wyndham Road bridge at or about NZTM 2000 1278920E 4861696N.

**We are not a trade competitor** for the purposes of [section 308B](#) of the Resource Management Act 1991.

**The specific parts of the application that our submission relates to are:** the entire application.

**Our submission is:**

Hokonui Rūnanga Inc **opposes** the application.

The reasons for opposing the application are as follows:

1. The proposed activity does not align with the cultural significance of the Mataura River and proposals to restore the mauri of the Matuara River.
2. The proposal does not address the adverse effects on mana whenua of the direct discharge of contaminants, including treated wastewater, into the awa.
3. The AEE is inadequate. The AEE is based on the premise that the effects of this discharge will be the same as the current discharge and therefore are appropriate, even though the volumes proposed to be discharged are considerably larger and the planning framework within which these matters are considered under the Resource Management Act 1991 (the Act) has changed.

4. The proposed activity fails to achieve the purpose of the Act; to manage freshwater in accordance with the fundamental concept of te mana o te wai as required under the National Policy Statement for Freshwater Management 2020; and is inconsistent with the Southland Regional Policy Statement and the proposed Southland Land and Water Regional Plan.
5. We do not agree that the activity meets the threshold to enable it to be granted as a non-complying activity under s104D of the Act.
6. The application relies on s124 of the Act but the application is not for the same activity as the existing consent. The proposed volume of wastewater to be discharged in this application is considerably larger than the current consent. Therefore, in our view, it is not an application for the same activity as the existing consent and s124 of the Act does not apply.
7. While the application is for a short-term duration, there is no proposal for alternative discharge options being investigated by Southland District Council. The current consent duration was for 15 years during which time the Council has been aware of the position of mana whenua on the discharge of contaminants into the awa, yet no progress has been made towards addressing this issue. We are concerned granting this consent as applied for will simply enable a cycle of granting discharge permits with short durations to Southland District Council, to allow the wastewater to continue to be disposed of into the awa, while little or no progress is made towards an alternative.

**We seek the following decision from the consent authority:**

To decline the resource consent application; or

To impose conditions requiring the applicant to begin immediate work in consultation with Hokonui Rūnanga Inc or their mandated delegate (and other representatives of mana whenua) on options to remove the discharge from the awa by the end of the proposed five-year consent duration.

**We wish to be heard in support of our submission.**

If others make a similar submission, we will consider presenting a joint case with them at the hearing.



**Signature of submitter** (or person authorised to sign on behalf of submitter)

Date: 30<sup>th</sup> August 2023

Electronic address for service of submitter: [Lynda@hokonuirunanga.org.nz](mailto:Lynda@hokonuirunanga.org.nz)

Telephone: 027 2238 070

Postal address 140 Charlton Road, Gore 9774

Contact person: Lynda Murchison

# Resource Consent submission

To: The Chief Executive  
Environment Southland  
Private Bag 90116  
DX20175  
Invercargill

|                                |                                    |
|--------------------------------|------------------------------------|
| <b>Date</b>                    | 30/08/2023 16:17                   |
| <b>Online reference number</b> | RC230877258                        |
| <b>Full name of submitter</b>  | Hokonui Runanga Inc                |
| <b>Postal address</b>          | 140 Charlton Road, RD 4, Gore 9774 |
| <b>Contact phone number</b>    | 0272238070                         |
| <b>Email</b>                   | Lynda@hokonui.org.nz               |

## Applicant details

|                           |   |
|---------------------------|---|
| <b>Name of applicant</b>  | Southland District Council                  |
| <b>Activity location</b>  | 4 Edendale Wyndham Road, RD 3, Wyndham 9893 |
| <b>Application number</b> | APP-20232970                                |

## Submission details

|  |  |
|--|--|
| <b>My submission relates to the whole application</b>  | Yes  |
| <b>Submission uploaded</b>   | Form 13 Submission on SDC Edendale Wastewater Discharge.pdf (231 kb) |
| <b>I am a trade competitor of the applicant (for the purposes of section 308B of the Resource Management Act 1991)</b> | No   |

For **now**  
& **our future**



## Outcome sought

**I wish Environment Southland to make the following decision** To oppose the application.  
**Why I wish Environment Southland to make this decision** Please see uploaded submission.

## Hearing details

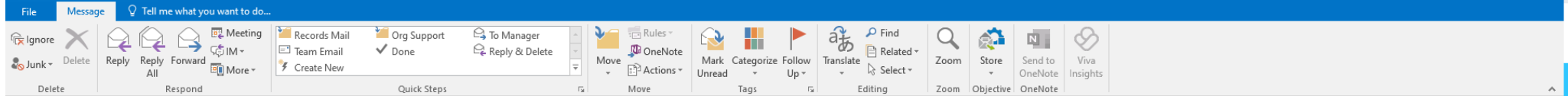
**I wish to be heard in support of my submission** Yes  
**I would consider presenting a joint case if others make a similar submission** Yes  
**I wish to be involved in any pre-hearing meeting that may be held for this application** Yes

## Confirmation

I have served a copy of my submission on the applicant and I confirm all of the above information is correct

For **now**  
& **our future**





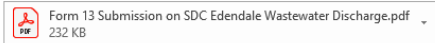
Wed 30/08/2023 4:32 pm

Lynda

Submission APP 20232970 Southland DC

To ES Consents

Follow up. Start by Thursday, 31 August 2023. Due by Thursday, 31 August 2023.

**Kia ora**

Please find attached a submission made on behalf of Hokonui Runanga Inc on the above application. I have submitted this via the portal contained with the application but it did ask for a street address for the location of the activity, which is difficult for a discharge to a river; and it would only accept a recognized postal address. Hence I've emailed you the submission as well incase the portal hasn't worked.

**Nga mihi**

Lynda Murchison

Environmental and Cultural Planning Lead

Hokonui Rūnanga Kaupapa Taiao

[Lynda@hokonuirunanga.org.nz](mailto:Lynda@hokonuirunanga.org.nz)

140 Charlton Road, Gore 9774

Waea pūkoro: 0272238070

Website - [Taiao - Hokonui Rūnanga Kaupapa \(hokonuitaiao.org.nz\)](http://Taiao-HokonuiRunangaKaupapa(hokonuitaiao.org.nz))

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