

Resource Consent submission

To: The Chief Executive
Environment Southland
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DX20175
Invercargill

Date	11/04/2024 10:03
Online reference number	RC240420976
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Applicant details

Name of applicant	Meridian Energy Limited
Activity location	Manapōuri Lake Control Structure, including the Waiau Arm at the confluence of the Waiau Arm and Mararoa River
Application number	APP20233670

Submission details

My submission relates to the whole application	Yes
Submission uploaded	Submission to Meridian APP20233670.pdf (557 kb)
I am a trade competitor of the applicant (for the purposes of section 308B of the Resource Management Act 1991)	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 I have included my reasons and the conditions sought in my 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**





Submission to consent APP20233670

Prepared by: Ulrike Sirch

9 April 2024

To the Chief Executive Officer, Environment Southland, Waikiwi, Invercargill

Overview:

Meridian seeks to build a parallel channel to the existing Lake Manapouri's Waiau Arm outlet, just above the Mararoa Weir. This is according to Meridian to provide better flows down the Lower Waiau River, as the existing channel is not deep enough and not well enough aligned. This is the sole reason given and we oppose this project.

Our reasons to oppose the application:

At first glance the new channel might be a good idea to get more water flowing down the Waiau River, that is exactly what lots of people living at the Lower Waiau River want. At times the flow at the Waiau River Mouth, where we live, is that low that it acts more like a lake and not a river anymore and the flushing flows Meridian is supposed to let down the river either aren't noticeable or didn't happen at all.

So on paper it sounds good to get 'more' water down the river but we believe there's reason to object, as outlined below.

Flushing flows in combination with long low flows cause erosion:

Meridian finally acknowledges that the flushing flows were only 30% of the volume they should have been.

The Project seeks to improve flow conveyance and reliability through the MLC for the benefit of freshwater values in the LWR. The proposal is predicted to increase flushing flow reliability to approximately 70% from the existing 30% reliability.(4)

There are consequences to that and Meridian notes the growth of algae and other 'nuisance periphyton' but not the effect it has on the Waiau River Mouth. Because the flushing flows have been so little for so long and way below what the resource consent requires, surely Meridian should be held to account for the damage they have caused to the banks below the houses and should be made to rectify it. We wonder why this has not been enforced by Environment Southland.

We are not experts but have been living in the area for many years and have observed the changes in the river over these years:

A long low flow at the river mouth will cause the mouth itself to get very narrow, sometimes to the point of nearly closing. It forms a 'bottleneck' as there's not enough water to keep a wide mouth open and with the wave action together it does form this type of riverbed:

The picture below was taken after a long period of low flow and with the next high flow the river eroded the bottleneck away on both sides of the riverbed, with that causing erosion on the land side, where our home and that of our neighbours are located.



The beach you can see on the land ward side is by now gone completely.

Meridian now proposes with the new arm that the flushing flows will be holding 70% more water, but there's no thought as to what that will do to the bank on which our homes are built on.

I fear that this scenario of low flow - river channel gets very narrow at the area of the mouth - flushing flow with 70% more water - erosion into the bank where our homes are, will get far worse by the new proposed channel.

In the report prepared by Tonkin and Taylor (1), it states under policy 15 in table 9.1:

Policy 15: Communities are enabled to provide for their social, economic, and cultural well-being in a way that is consistent with this National Policy statement.

The social, economic, and cultural well-being of people and communities is linked to the health and wellbeing of the LWR. In that regard the Project's purpose aligns with this policy.

The effects of the prolonged low flows with some flushing flows on the river mouth environment, especially the erosion it causes has not been acknowledged, or even looked at by Meridian. In my eyes Meridian is 100% to blame for that and has never entered any discussion with us. If we all lose our houses, our homes and in our case our business as well, it is hardly a provision for our social, economic or cultural well being.

As Meridian is 51% government owned, highly profitable and directly responsible, there must be some social obligation to its citizens.

Time frame:

Meridian is applying for a 35 year consent, which we think is a far too long period, given the risks to our home and livelihood. Most of the erosion threatening us has been happening within the last 12 months, but the changes along the river mouth have been going on for far longer. If Meridian keeps the river flow as low as they have been for these extended periods of time and then put occasionally flushing flows with a high volume down without any of our suggested solutions in place it will cause more of our bank to erode. And it will be

inevitable that at the very least some houses will fall in the river. Meridian has not allowed for any observation of the effects of their proposal on the area of the Waiau River Mouth in short term or long term and we think it should be monitored regularly and recorded. To give them a consent for 35 years without having to fix the problems they caused seems to me a free ride for a big and rich company.

Solution:

We would like to suggest three solutions for Meridian to consider:

- Finance the building of a rock wall along the bank where our houses are built on
- Increase the general flow down the river outside of the scheduled flushing flows and with that stop the river mouth forming a tight bottleneck and causing problems for us. A regular higher flow would keep the mouth open, but also help the Lower Waiau River health in general with all the benefits Meridian is claiming for this project and also help move the sediment out of the channel, which is Meridians main problem and only real concern in reality.
- Open a new river mouth to the east of our properties, where Emergency Management Southland attempted to open one, but stopped before the project was finished in February, and in connection with that build an equilibrium rock wall across the existing channel to guide the river out the new mouth. An equilibrium rock wall (spillway) being a rock wall with culverts in it at a higher level to let some water go through. This will be more affordable compared to a totally block rock wall and it will take the pressure off the rock wall in times of high floods and also the small amount of water going through won't do any harm to the then nearly dry lagoon area behind it. Picture of placement attached in appendix. (2), current state of the river mouth, appendix (3).

Conclusion

It is time for Meridian to show some social conscience and accept responsibility for the changes at the Waiau River Mouth. We are no experts with degrees on the river, on power generation, or anything related, but we are local residents and we see the changes every day and we will pay for it with all our possessions. That is more than any expert can give you. Our family has been living at the Waiau Mouth for over 30 years, my sons have grown up here and call it their home.

All of us have very tight connections to the river and to see it every summer and sometimes even in the spring, autumn and winter to have barely any water in it, to be reduced to a mere stream that it can't even make a proper exit into the ocean is without exaggeration quite heartbreaking. People don't believe me when I try to explain that, but it's true. We go for a walk and shake our heads in disgust looking at the dribble coming down. From our back fence we overlook the river, the lagoon and the ocean and now often we look past the river, focusing on the ocean, as the river is an embarrassment. We used to go for swims in the river, now we don't bother as there's not enough water in it to get wet. Meridian has never acknowledged it's responsibility for the changes it has caused at the Waiau River Mouth, with this new project they claim to be concerned about the health of the Lower Waiau River, in which case they can just simply put more water down regularly. They can still provide flushing flows and build their new channel, but please make them put down more water in general, make them pay for a rock wall and also for some independent observation of the effects their project has on the river and the area around the mouth where we live and we care for so much.

Thank you for taking our view in consideration,

kind regards

Uli Sirch, Dean Thompson, Tass Abbott, Oli Abbott

Home owners of Bluecliffs Beach 29 and 31

Appendix:

(1) Tonkin and Taylor report prepared for Meridian Energy Limited, by Tonkin and Taylor Ltd
December 2023

<https://www.es.govt.nz/repository/libraries/id:26gi9ayo517q9stt81sd/hierarchy/environment/consents/notified-consents/2024/>

Meridian%20Energy%20Limited%20APP-20233670/1%20Application%20Documents%20and%20Further%20Information/AEE%20-%20Manapouri%20Lake%20Control%20Improvement%20Project%20-%20Final

(2)



(3) PICTURE OF THE RIVER MOUTH, DATED 10/4/24, SHOWING HOW PATHETICALLY SMALL THE MOUTH IS AGAIN, AFTER MULTIPLE MONTHS OF LOW RIVER FLOW.



(4) Tonkin and Taylor report prepared for Meridian Energy Limited, by Tonkin and Taylor Ltd
December 2023, in the Executive Summary.

[https://www.es.govt.nz/repository/libraries/id:26gi9ayo517q9stt81sd/hierarchy/environment/consents/
notified-consents/2024/](https://www.es.govt.nz/repository/libraries/id:26gi9ayo517q9stt81sd/hierarchy/environment/consents/notified-consents/2024/)

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