

Resource Consent submission

To: The Chief Executive
Environment Southland
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Date 03/09/2024 12:13
Online reference number RC240905121

Full name of submitter The Royal Forest and Bird Society of New Zealand
Postal address 764 Cumberland Street, Dunedin North, Dunedin 9016
Contact phone number Section 53
Email

Applicant details

Name of applicant Te Rūnanga o Awarua, Department of Conservation, and Environment Southland
Activity location Waituna Lagoon
Application number APP-20242456

Submission details

My submission relates to the whole application Yes
Submission uploaded APP-20242456 - Written submission by Forest & Bird on publicly notified resource consent application by ES DOC Runaka.pdf (143 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

Whilst Forest & Bird support the purpose and majority of the application, we oppose the proposed opening regime triggers for consecutive days that water levels exceed 2.5mASL.

It is proposed that for years 6-15, openings may occur if water levels are at or above 2.5mASL for three consecutive days, and this increases to seven consecutive days for years 16-20. We would prefer an opening regime with an extra step as follows:

- Years 6-10 openings may occur if water levels are at or above 2.5mASL for three consecutive days.
- Years 11-15 openings may occur if water levels are at or above 2.5mASL for five consecutive days.
- Years 16-20 openings may occur if water levels are at or above 2.5mASL for five consecutive days.

The above regime would provide more of an incentive for surrounding landowners to reduce inputs to the lagoon incrementally, or to retire farmland and integrate nature based solutions to reduce the effects of land inundation.

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

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



Otago/Southland Office
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New Zealand

3 September 2024

Section 53

www.forestandbird.org.nz

Environment Southland
esconsents@es.govt.nz

APP-20242456 - WRITTEN SUBMISSION BY FOREST & BIRD ON CONSENT APPLICATION BY TE RŪNANGA O AWARUA, DEPARTMENT OF CONSERVATION TE PAPA ATAWHAI AND ENVIRONMENT SOUTHLAND

THE PROPOSED ACTIVITY

1. Water and Discharge Permits for:

- The diversion and discharge of water and sediment from Waituna Lagoon to the Coastal Marine Area (CMA)
- The diversion and discharge of seawater and sediment from the CMA into the Waituna Lagoon

2. Land Use and Coastal Permits for:

- Earthworks and disturbance of the bed of Waituna Lagoon and margins
- Disturbance of the CMA
- Incidental indigenous vegetation clearance

3. Purpose: to establish a regime for the management of water levels in the lagoon. The proposed regime utilises a combination of water level, ecological, water quality and fish passage triggers and thresholds over a 20 year term to guide lagoon openings.

4. Location: Waituna Lagoon - as described in Appendix D of the application

5. Legal Description of Property: Section 29 Block XIII Oteramika HUN & Coastal Marine Area

FOREST & BIRDS POSITION ON THE PROPOSED ACTIVITY

6. I, Chelsea McGaw of the Royal Forest and Bird Protection Society Inc. oppose the granting of Te Rūnanga o Awarua, Department of Conservation Te Papa Atawhai and Environment Southland's application to hold 20-year consents to establish a regime for the management of water levels in Waituna Lagoon, unless our recommendation for an updated regime is included in the conditions of consent.

I, do wish to be involved in any pre-hearing meeting that may be held for this application.

I, do wish to be heard in support of my submission.

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

INTRODUCTION

7. The Royal Forest & Bird Protection Society Inc. of New Zealand (Forest & Bird) is Aotearoa New Zealand's leading independent conservation organisation. Forest & Bird has played an important role in protecting and preserving New Zealand's environment and native species for a century. Forest & Bird is independently funded by private subscription, donations, and bequests.
8. Forest & Bird has for many years had a strong interest and involvement in protecting and restoring nature on land, in freshwater and in the ocean, throughout the country including in the Southland District. Our Forest & Bird strategic objectives are as follows:
- **Climate Centred:** Ensuring our country does everything we can to keep the climate safe for all life on Earth. The impact of climate change will be at the centre of everything we do.
 - **Economy that Supports Nature:** A Community that recognises that the long-term economy is dependent on a healthy environment for nature's intrinsic and lifegiving values.
 - **Vibrant Landscapes:** Stable, healthy ecosystems full of native animals and plants.
 - **Energised Water, Rivers and Wetlands:** Rivers, streams and freshwater that run clean, healthy and are teeming with life.
 - **Oceans Alive:** Protected and preserved marine life and ecosystems.
9. Forest & Bird have an active volunteer branch in Southland, part of a network of 45 volunteer led branches nationally, whose multigenerational members and supporters play an important and active role in protecting and restoring the region's native species and habitats in their respective districts. Within Forest & Bird there is a wealth of knowledge and expertise on protecting and restoring Aotearoa New Zealand's native ecosystems and species. Forest & Bird also have regional Kiwi Conservation Clubs for tamariki, and Youth branches for rangatahi across the country.

10. Forest & Bird is grateful for the opportunity to submit on the publicly notified resource consent application by Te Rūnanga O Awarua, Department of Conservation Te Papa Atawhai and Environment Southland.

GENERAL COMMENTS

11. Whilst Forest & Bird support the purpose and majority of the application, we oppose the proposed opening regime triggers for consecutive days that water levels exceed 2.5mASL.

12. It is proposed that for years 6-15, openings may occur if water levels are at or above 2.5mASL for three consecutive days, and this increases to seven consecutive days for years 16-20. We would prefer an opening regime with an extra step as follows:

- Years 6-10 openings may occur if water levels are at or above 2.5mASL for three consecutive days.
- Years 11-15 openings may occur if water levels are at or above 2.5mASL for five consecutive days.
- Years 16-20 openings may occur if water levels are at or above 2.5mASL for five consecutive days.

13. The above regime would provide more of an incentive for surrounding landowners to reduce inputs to the lagoon incrementally, or to retire farmland and integrate nature based solutions to reduce the effects of land inundation.

We welcome any questions on our feedback/submission and would be happy to discuss further.

Kā Mihinui



Chelsea McGaw

Regional Conservation Manager (RCM) – Otago and Southland
Royal Forest and Bird Protection Society of New Zealand Incorporated.

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