

Resource Consent submission

To: The Chief Executive
Environment Southland
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Online reference number RC240900374

Full name of submitter Ian Kenneth Welsh
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Applicant details

Name of applicant Te Rūnanga o Awarua, Department of Conservation,
Environment Southland
Activity location Section 29 Block XIII Oteramika HUN & Coastal Marine Area as
per consent application.
Application number APP-20242456

Submission details

My submission relates to the whole application Yes
Details of my submission I have concerns that the applicants' supporting information and
assessment of effects does not address the following. It appears
to be deficient and should be rejected until these matters are
dealt with.
1. Farms' economic problems through a lack of drainage outfall

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and water build up on neighbouring property

a. Denitrification (nitrate to nitrogen gas) of pasture soils due to anaerobic conditions and activity (biological and chemical) in soils at field saturation levels for extended periods. This loss of plant available nitrogen would lead to reductions in pasture health and yields. Does this mean a greater application of nitrogenous fertilisers to meet the deficit? Who pays? No economic effect of the proposals is given per affected landowner. Therefore the assessment of environmental effects accompanying the application is deficient on this effect on neighbouring landowners.

b. Poor drainage outfall and damp land may force farmers to move stock for fear of exceeding grazing restrictions per Regional Plans. The risks and cost of this restriction on lawful land use have not been assessed.

c. The former opening regimes enabled farming to occur in the tributary catchments of Lake Waituna by providing drainage outfall (the former Southland Land drainage Act etc.). Farm investment decisions (including purchase) were made on the capability to grow pasture and livestock in the neighbourhood of the lake. The risk of loss of earnings from stock and pasture and the loss of resale value from future saturated land are not commented on. Further, there is no suggestion of compensatory measures such as rates relief or further purchases of affected land to mitigate loss of return on investment.

2. Loss of terrestrial biodiversity and habitat through submersion

a. Direct loss through drowning or periodic drowning. Each water level scenario fails to adequately look at the effects of drowning on the various ecotones through the catchment and its tributaries. These areas represent the transition between neighbouring ecosystems are the most ecologically diverse parts of the catchment areas.

b. The water levels only talk in generic terms of effects and appear to treat all levels of water the same in this regard. Moreover, genetically rare or unique species are not mentioned. The established hydroperiods of the last 100 years will be adversely affected and so will the components of genetic, functional and species diversity established over the same time (disruption of an extant equilibrium).

c. Indirect loss through rotting of drowned vegetation and

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detritus. This could mean localised reductions in dissolved oxygen from biological decay of drowned organic matter.

3. The proposed water levels appear arbitrary and based on historic data that does not correlate with effects on neighbouring land nor accommodate climate change.

a. What is the justification for each level? Where is a cost benefit analysis for each level? How can consent decisions be made with certainty and fairness without this underpinning knowledge?

b. Predicted conditions of climate change in the South forecast increased prevalence of extreme rain events (frequency, intensity and duration) together with increased annual rainfall. Has due regard been given by the applicant for this predicted change to climate baseline character for a consent of such a long duration. Failure to consider catchment and wider catchment effects from baseline climate changes renders the applicants' efforts more ideological than science based.

4. The application

a. The discharge of water and sediments is mentioned in the application. The discharge of non-sediment contaminants such as nutrients and bacteria and their effect on the receiving environment are not mentioned or applied for. Given these other contaminants will flow into the Coastal Marine Area should they also be part of the application and supporting information?

No

No

Submission uploaded

I am a trade competitor of the applicant (for the purposes of section 308B of the Resource Management Act 1991)

Outcome sought

I wish Environment Southland to make the following decision

Why I wish Environment Southland to make this decision

To oppose the application.

- 1.The application itself does not deal with discharge of contaminants other than sediment or sea water. It is contaminated water.
- 2.The assessment of effects does not look at the adverse effects to drainage on surrounding farms and the effects of poor drainage. The costs to landowners and farm welfare are not considered.
- 3.Loss of biodiversity through drowning of associated terrestrial ecotones is not adequately covered.
- 4.Historic data has been used for water level proposals. The

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effects on neighbouring landuse over these times has not been analysed.

5.The historic data has not been updated to cope with baseline climate change over the course of this long duration consent

Hearing details

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| I wish to be heard in support of my submission | No |
| 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

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