

Resource Consent submission

To: The Chief Executive
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Online reference number RC240905954

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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 Waituna Lagoon Submission.pdf (192 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

With the current consent conditions I foresee negative environmental out comes. These outcomes will need to be justified. With a highly modified river and stream net work nutrient and sediment will continue to flow into the lagoon and I am worried that the community and catchment will be blamed.

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

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

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



Waituna Lagoon Submission

I strongly oppose the proposed opening consent for the Waituna Lagoon for the following reasons:

- The proposed maximum summer opening at 2.5m and the proposed increases that are to follow are not proven to have a positive outcome on the health of the lagoon. There is data to suggest that it will lead to fewer openings over the summer months but I would argue more monitoring needs to be done at the lower level of 2.2m before major changes are implemented. As we saw prior to the opening in January 2024 when all the six Lagoon health metrics were achieved and then six months later all the Ruppia was killed off. The ecology of the lagoon couldn't handle the sudden change in management.
- The shading affect on the Ruppia from higher water levels from the tannins in the water. What percentage of Ruppia lose is acceptable?
- Public and private infrastructure loss and damage due to the higher water level in particular the bridge and road on Waghorn Road. Currently the bridge has been in or under water for the last three months and the access on and off the bridge is severely rutted which has caused the road to close. At 2.3m the bridge is under water and that is a large public investment that is rusting and rotting away which should be an unacceptable outcome.
- The loss of access to the viewing platform of the world renowned Ramsar site which was established in 1976 and the damage that has been done to the public walking tracks.
- The effect it will have for the migrating and wading birds that inhabit the lagoon, what will this do to the Ramsar status?
- The slumping of river banks which is adding to the nutrient loading of the lagoon with the extra sediment.
- The hydraulic effect on the land and subsurface drainage which has only been modelled and is not fully understood. When subsurface drainage has stagnate water in them for long enough they silt up and become blocked. This will add to the sediment loading in the Lagoon when they become unblocked.
- The breach of property rights that will be occurring when neighbouring land is flooded out and in a constant state of water logging. Land owners will be limited in what they can do to look after and care for the land let alone try and make a living off their investment.

Other concerns include:

The time frame of the consent and the ability to review and change it has some real limitations. I am concerned that it will be difficult to change the proposed consent during the period that is proposed which could lead to poor environmental, social and economic outcomes.

When the consent is approved I have real concern that there is no reference to having approval to gaining access to the DOC reserve which will be required when the opening needs to happen. In the past this has been used as a way to stop the opening from occurring even if all the other targets have been met. The three entities that are proposing this consent have different values and goals and this can result in conflicts which might not be resolved in a timely manner which we witnessed with the opening in January 2024 taking three months for a decision. With constant staff changes

within these organisations I think it's prudent to have an agreement with DOC to gain access to the reserve to carry out the opening.

As it stands who ever holds the consent will be deemed to have a conflict of interest as was the case with the Control Association leaning heavily to land drainage. Over that time with the blunt tool that they had they were able to meet 40-50% of the health metrics that the lagoon was measured against. Over the last two years under the management of DOC, Te Runanga O Awarua and ES they were able to meet all six metrics in the first year and then none were met the following year.

The only stakeholder that will benefit from the higher level are the ponds owned by Te Runanga O Awarua and the geese and swans that will inhabit them.

What I am keen to see happen:

- Maximum opening height of 2.2m.
- Annual opening in winter for fish passage and allow the Lagoon to close ready for summer.
- Increased community engagement on when and how the Lagoon is opened.
- Determine if the current opening level of 2.2m meets all the environmental, social and economic goals of all the stakeholders.
- If not what are we all happy with because a balance has to be struck.

Thank you for taking the time to read my submission.

Regards

Maarten van Rossum