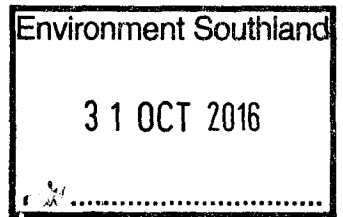


Bronwyn Auckram

From: Courtney Keen on behalf of Facility Manager
Sent: Monday, 31 October 2016 12:57 p.m.
To: Bronwyn Auckram
Subject: FW: APP-20168843_Submission
Attachments: Submission- ICC- Stormwater Discharge.pdf



From: Stevie Blair
Sent: Monday, 31 October 2016 12:11 p.m.
To: Facility Manager
Subject: APP-20168843_Submission

Tēnā Koe,

Please find attached a submission prepared by Te Ao Marama Inc on behalf of te Rūnanga o Waihōpai for the Invercargill City Council Stormwater discharges.

Please let me know if you require anything else.

Nāhaku Noa Nā,
Stevie-Rae Blair
Junior Māori Environmental Officer
Te Ao Marama Inc
408 Tramway Road
Invercargill 9810

CAUTION: This email and any attachment(s) contains information that is both confidential and possibly legally privileged. No reader may make any use of its content unless that use is approved by Te Rūnanga o Ngāi Tahu and its subsidiary companies separately in writing. Any opinion, advice or information contained in this email and any attachment(s) is to be treated as interim and provisional only and for the strictly limited purpose of the recipient as communicated to us. Neither the recipient nor any other person should act upon it without our separate written authorization of reliance. If you have received this message in error, please notify us immediately and destroy this message.



31 November 2016

Consents Department
Environment Southland
Private Bag 90116
Invercargill

Tēnā Koe Stephen,

RE: Submission on Resource consent application-20168843 Invercargill City Council

Please find attached a submission lodged, prepared by Te Ao Marama Inc. for Te Rūnanga O Waihopai for the discharge permit being sought by the Invercargill City Council.

We trust the information contained within the submission is sufficient; however, should you wish to discuss any aspect further, please do not hesitate to contact me.

Nāhaku noa nā,

A handwritten signature in black ink, appearing to read "SRB", followed by a horizontal line.

Stevie-Rae Blair

Te Ao Marama Inc.

Junior Māori Environmental Officer

SUBMISSION ON A LIMITED NOTIFICATION RESOURCE CONSENT APPLICATION

To: The General Manager
Environment Southland
Private Bag 90166
Invercargill 9840

Consents Officer: Stephen West – Principal Consents Officer

Name of Submitter: Te Rūnanga O Waihopai

Prepared by: Te Ao Marama Inc
PO Box 7078
South Invercargill
Invercargill 9844

Name of applicant: Invercargill City Council

Application: APP-20168843

Proposal: Environment Southland has received an application from the Invercargill City Council

Our position: We are **opposing** this application.

A copy of this submission **has been sent** to the applicant.

DECISION WE WISH THE COUNCIL TO MAKE:

We wish to acknowledge that the ICC has undertaken a pre application hui with Te Ao Marama Inc and other stakeholders in March of this year.

As a result of the information received it was concluded that Council will continue to maintain and upgrade their infrastructure as financially acceptable and when opportunity arises. This will take place on a continuing timeline for 50 years to have all areas renewed as to the recommended lifetime of the infrastructure.

In 2010, Te Ao Marama Inc. undertook a combined study (Tiakina te Whanga) with Landcare Research and Mana Ahuriri from Napier. This was to understand both the Oreti Estuary and the Ahuriri Estuary. Through research, it was obvious that the estuarine environments are under extreme pressure from human influences and infrastructure.

Ngāi Tahu ki Murihiku have a policy within their Iwi Management Plan Te Tangi a Tauria, 2008 which states we should not be granting consents for activities where we do not know what the effects are over the long term. Anything over 25 years is essentially making decisions for the next generation. Continual improvement of systems and infrastructure is fundamental in our thinking to provide for the health and wellbeing of our Iwi and future generations.

We believe 35-year consent duration is inappropriate for this application.

The Oreti Estuary is under extreme pressure from contaminants entering it via its waterways and this includes storm waters. Large eutrophic areas within the estuary continue to increase in size.

The application does not include reference to impacts on Iwi values or suggest any monitoring options that inform Iwi of the risks of continued discharge of contaminants into the estuary.

We are concerned about our mahinga kai, cockle fields, fish nurseries, eel and kanakana populations. Amenity values and sedimentation are issues that concern us also.

Te Ao Marama Inc wish to be a part of any pre-hearing meeting that may be held for this application.

If others make a similar submission, Te Ao Marama Inc will consider presenting a joint case with them at a hearing.

Nāhaku noa nā

A handwritten signature in black ink, appearing to be 'SRB' followed by a horizontal line.

Stevie-Rae Blair

Te Ao Marama Inc.

Junior Māori Environmental Officer