

# SUBMISSION FORM

## Submission on a Notified Application for a Resource Consent

To: The Chief Executive Environment Southland  
Private Bag 90116  
DX20175  
Invercargill

I: *William Menlove*  
of: *299 Five Rivers Lumsden Highway, RD3 Lumsden 9793*  
at: 0274715496      menlovew@gmail.com

### **Wish to OPPOSE submission on the application of:**

Name: Castlerock Farming Company

Application Number: APP-20181676

Location: 72 Castlerock Road, Lumsden at about NZTM2000 1242000E 4926000N

My reasons for my submission are: *(State the nature of your submission and give clear reasons. Continue on attached pages if necessary)*

1. Southland District Council established 2 production wells at the end of Keown Road and Oreti Street for the purpose of securing reliable, safe water for a community water scheme. When these were developed and the Keown Road bore subsequently pumped at 47l/sec the piezometric head in bore E440/256 declined to the extent that ability to extract the consented volume of water from E44/0256 was severely compromised. Even though it was a "community good" project, the consent did not meet the standards required and was declined by Environment Southland which forced SDC to develop an alternative water source.
2. I have issues with the modelled data on interference and drawdown effect the proposed bores will have on existing extractions being used to estimate the effects. The assumption that "the modelled drawdown on those wells is highly unlikely to have significant adverse effect" is concerning. Existing consent holders need to be assured that any further consents do not compromise their ability to use the resource as it was designed and consented to do.

When bore E44/0339 is pumped it causes a 2 metre drop in the piezometric head in E44/0256. This bore is situated 2.4km NW of E44/0256. The effect of E44/0623 has not

been measured. However the combined effect of this consent (activated on different titles) created the necessity for capital expense of \$30000 and increased energy costs of 18% p.a to rectify the ability to achieve the consented pumping rate of E44/0256. This interference is not insignificant.

The proposed wells 1,2,3 and 7 are 1.56km,1.44km,1.86km and 1.74km away respectfully. Substantially closer than E44/0339. Real time observations (as was done when SDC pump tests were conducted) are more reliable than modelling. Modelling of effects on other peoples rights is not accurate enough to give assurance the effects are not significant.

The total volume of water the the aquifer holds or the percentage of the aquifer that is already allocated, or potentially could be, on an annual basis or the limited days of use is not the issue. The concern is the immediate, day to day cumulative effect that all consented bores being pumped at their maximum allowable rates has on the drawdown of the aquifer and what will actually happen if more bores are added.

This raises the question; If drawdown effect from E44/0339 & 0623 already have negative impacts and SDC were declined access to the aquifer in the immediate location why should any more consents be granted?

3. *"5.1 Assessment of Alternatives The alternative to this groundwater take is the applicant's existing surface water take. While this will remain the applicant's primary source of water, as discussed above it is unreliable and frequently the applicant is unable to take surface water when irrigation is most needed to allow grass growth."*

The applicant would/ should have been fully aware of limitations of the existing surface water take when they undertook the investment. To use the unreliability of this source as as justification for access to the Lumsden aquifer is not valid.

Water harvest and storage from existing source has not been listed as an alternative.

4. Application for bore permit and groundwater take permit simultaneously. Verification of viability, sustainability, and level of interference of proposed development need to be addressed prior to groundwater take permits being allocated.
5. If the objective of obtaining consent to use water from the Lumsden aquifer is to secure more reliable water for existing irrigation and wash down why is there exploration at bore sites 2,3 and 5?

I wish the Council to make the following decision (*Give precise details, including the nature of*

*any conditions sought)*

From the observations, measurements taken and the knowledge of what occurred when the SDC wells were pumped I urge the Council to **not grant Castlerock Farming Company for test bores and a groundwater permit.**

If Council elects to grant consent it should be primarily for exploration and test bores

Individual water extractions from the aquifer are not mutually exclusive and any testing needs to recognise this. i.e. Any pump tests need to not only measure direct interference with existing bores but also the cumulative effect of extractions. Therefore full testing needs to be conducted prior to and while all wells are pumping at their maximum allowable takes to verify any modelled or extrapolated data.

**I am not** a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

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

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

I have served a copy of my submission on the applicant. Yes

**Signe W.E.G Menlove**

**Date 3/5/2019**

If you have any queries about this form or its purpose please contact the Consents Division of Environment Southland

(03) 211 5115 or 0800 76 88

45.