

7 May 2019

Southland Regional Council
Private Bag 90116
INVERCARGILL

service@es.govt.nz

Attention: Rebecca Robertson

Dear Rebecca,

Castlerock Farming Company Ltd. APP-20181676

I refer to the application by Castlerock Farming Company Limited for a water permit to abstract ground water for irrigation, stockwater and dairy washdown; a water permit to abstract groundwater for the purpose of aquifer testing; and a land use consent for the construction of up to 12 bores for purpose of water abstraction, test bores and piezometers in the Oreti River catchment at Castlerock near Lumsden.

Please find enclosed a submission by the Director-General of Conservation (D-G) in respect of this application. You will notice the submission seeks that the application be declined. The D-G considers that the application contains insufficient detail to adequately determine the potential environmental effects and therefore what measures would be necessary to adequately avoid, remedy or mitigate the adverse effects. The submission identifies the D-G's concerns.

Please contact Ken Murray in the first instance if you wish to discuss any of the matters raised in this submission either by cell phone 0275734624 or kmurray@doc.govt.nz.

Yours sincerely



Tony Preston
Operations Manager (Murihiku)

Address for Service:
Department of Conservation
Private Bag 4715
Christchurch Mail Centre
Attn: Ken Murray
kmurray@doc.govt.nz

CC:
Tim Muller
Landpro
13 Pinot Noir Drive
Cromwell 9342
Email: tim@landpro.co.nz

Form 13: Submission on publicly notified application concerning resource consent

Resource Management Act 1991

To: Southland Regional Council

Name of submitter: Director-General of Conservation

Applicant: Castlerock Farming Company Ltd.

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

Description of activity: A water permit to abstract up to 113,745m³ per year of water from the Lumsden Aquifer with a maximum take of 4,320m³ per day for irrigation, stockwater and dairy washdown. The water permit will increase the annual volume of water abstracted from the 43,800m³ per year currently authorised.

A water permit to abstract up to 4,320m³ per day of groundwater from the Lumsden Aquifer for the purpose of aquifer testing.

A land use consent for the construction of up to 12 bores for the purpose of water abstraction, test bores and piezometers.

Purpose: Irrigation, stock water and dairy washdown.

Application number: APP-20181676

My submission relates to: The whole application

My submission is: I oppose the application in its entirety.

I am not a trade competitor.

The reasons for my submission are that:

Lumsden Aquifer is nearing full discretionary allocation or is overallocated

1. The proposed take is from the Lumsden Aquifer. The Lumsden Aquifer underlies the Oreti River and its tributaries including Murray Creek. The Lumsden Aquifer is considered

overallocated when assessed against the Regional Water Plan for Southland (Operative Plan). Under the proposed Southland Water and Land Plan, the Lumsden Aquifer is nearing the full allocation as a discretionary activity.

Murray Creek and Oreti River have significant indigenous biodiversity values and are a habitat of taonga species

2. The Oreti River is for much of its length a braided river with a range of habitats and few barriers to fish passage. As a result, there is a diverse assemblage of indigenous fish species. Of note is the presence of three species of non-migratory galaxiids (Alpine galaxias, Gollum galaxias, and Southern flathead galaxias), all of which have a conservation status of 'Threatened: Nationally Vulnerable'. The Oreti River has outstanding characteristics as a habitat for black billed gulls whose nesting success is improved by bare gravel islands surrounded by water and of brown trout (Water Conservation(Oreti River) Order 2008).
3. Murray Creek is a gaining stream, receiving groundwater from the underlying aquifer. It is a significant habitat fragment of Gollum galaxias (Nationally Vulnerable), and longfin eel (Gradual decline). Non-migratory galaxiids have undergone range reduction and population fragmentation as a result of habitat loss and introduced species. Protection of remaining habitat of non-migratory species is key to ensuring long term security of these species.
4. The Murray Creek and Oreti River are a habitat of taonga indigenous freshwater fish species.

The adverse effects of the proposed take of groundwater on surface water are uncertain

5. The Applicant has not undertaken the drilling of any bores and aquifer testing. As a consequence the cumulative adverse effects on long term aquifer storage and the Lumsden aquifers connections to the unconfined and surface waterbodies of in particular Murray Creek and Oreti River are uncertain.
6. There is also a lack of hydrological information on cumulative effects of groundwater and surface water takes in the Castle Rock/Lumsden /Ram Hill /Five Rivers Area on surface water flows of the Oreti River and spring fed creeks during extended periods of low flows as occurred in January 2018.

Decision sought:

1. That the application is **declined**.

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

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



Tony Preston [Operations Manager Murihiku]

Acting pursuant to delegated authority

7th May 2019

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Address for service:

RMA Shared Services

Department of Conservation

Private Bag 4715

Christchurch Mail Centre 8140

Attn: Ken Murray

kmurray@doc.govt.nz

