



10 May 2019

Consents Manager
Environment Southland
Private Bag 90116
Invercargill

Tēnā Koe,

RE: Submission on Resource consent application-APP-20181676

Please find attached a submission lodged, on behalf of Te Rūnanga o Waihōpai on Resource Consent applications by Castlerock Farming Company Limited for a water permit to abstract groundwater 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 the purpose of water abstraction, test bores and piezometers.

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,

Stevie-Rae Blair
Te Ao Marama Inc.
Māori Environmental Advisor

SUBMISSION ON A NOTIFIED RESOURCE CONSENT APPLICATION

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

Name of Submitter: Te Rūnanga o Waihopai

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

Name of applicant: Castlerock Farming Company Limited

Proposal: Environment Southland has received an application to:

- 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 landuse consent for the construction of up to 12 bores for the purpose of water abstraction, test bores and piezometers.

Our position: We are **opposing** this application and wish to be heard in support of this submission

The TAMI submission relates to the whole of the applications

TAMI wishes the application to be declined

If others are making a similar submission, TAMI will consider presenting a joint case with them at a hearing.

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

GENERAL POSITION

1. This submission has been prepared by Te Ao Marama Incorporated on behalf of Te Rūnanga o Waihopai.
2. Te Rūnanga o Waihopai (hereafter referred to as Ngāi Tahu) is supportive of development within its takiwā, provided activities are undertaken in a way that respects the environment where the activity to be undertaken does not adversely affect Ngāi Tahu cultural values, customs and their traditional relationship with land and water.
3. Ngāi Tahu understand that Castlerock Farming Company Limited Farms have applied for a water permit to abstract groundwater 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 the purpose of water abstraction, test bores and piezometers
4. The Ngāi Tahu ki Murihiku Iwi Management Plan ('Te Tangi a Tauira')¹ has policy that is directly relevant to the management of Rivers, water, water quantity and mahinga kai (section 3.5.10, 3.5.11, 3.5.14, 3.5.16).
5. The Oreti Awa is of cultural significance. The significance of the river to tangata whenua has been recognised by the Crown and is now a Statutory Acknowledgment under the Ngāi Tahu Claims Settlement Act (1998).

Papatipu Rūnanga

6. Te Rūnanga o Ngāi Tahu Act, 1996 (the TRoNT Act) and the Ngāi Tahu Claims Settlement Act, 1998 (the Settlement Act) gives recognition to the status of Papatipu Rūnanga as kaitiaki and manawhenua of the natural resources within their takiwā boundaries.
7. The consent application proposals relate to an existing activity to which the applicant would like to expand. The takiwā of Te Rūnanga o Waihopai.

Te Ao Marama Incorporated

8. Ngāi Tahu ki Murihiku formed an entity known as Te Ao Marama Incorporated, which is made up of representatives from Waihopai Rūnaka, Te Rūnanga o Awarua, Te Rūnanga o Oraka Aparima and Hokonui Rūnaka. Te Ao Marama Incorporated is authorised to represent the four Southland Rūnanga Papatipu in resource management and local government matters.

¹ Ngai Tahu ki Murihiku, 2008.

REASONS FOR SUBMISSION

9. Te Tangi a Taura identifies significant resource management issues regarding the Oreti River as Water abstractions and the relationship between surface water and groundwater.
10. Ngāi Tahu are opposed to this application because of the risks to the environment (including groundwater and surface water) and Ngāi Tahu values that it poses, and that it lacks enough information to evaluate whether these risks will be more than minor.
11. Ngāi Tahu understand that the Lumsden aquifer is over allocated under the Regional Water Plan and the Proposed Water and Land Plan allows for a small amount still to be allocated. Ngāi Tahu wish to further understand what effect this activity may have on mahinga kai and other Ngāi Tahu values particularly the relationship between groundwater and surface water when there a periods of low flows.
12. There is a need to avoid the risk of further deterioration to the environment and Ngai Tahu values and cultural wellbeing.

DECISION WE WISH COUNCIL TO MAKE

13. That the application is declined

CONCLUSION

14. We wish to be heard in support of our submission.
15. We wish to be a part of any pre-hearing meeting that may be held for this application.

Nāhaku noa nā



Stevie-Rae Blair

Te Ao Marama Inc.

Māori Environmental Advisor