



Submission on Notified Resource Consent Application to Open Lake Waituna

Federated Farmers of New Zealand

13 July 2022



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SUBMISSION TO ENVIRONMENT SOUTHLAND ON NOTIFIED RESOURCE CONSENT APPLICATION TO OPEN LAKE WAITUNA

To: The General Manager
Environment Southland
service@es.govt.nz

Submission on: Resource Consent Application to Open Lake Waituna from the Lake Waituna Control Association

(Land Use Consent and Coastal Permit application APP-20211669)

Date: 13th July 2022

From: **Federated Farmers of New Zealand**

Contact: **ELEANOR LINSCOTT**
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We wish to be heard in support of our submission

We 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

SUBMISSION TO ENVIRONMENT SOUTHLAND ON THE NOTIFIED RESOURCE CONSENT APPLICATION TO OPEN LAKE WAITUNA

1. INTRODUCTION

- 1.1 On behalf of our members in the Waituna catchment, Federated Farmers submits in support of the resource consent application from the Lake Waituna Control Association to periodically open Lake Waituna to the sea.
- 1.2 Federated Farmers has worked to represent farmers' interests in the catchment over a number of years as part of a multi-agency response to help improve the state of the Waituna Lagoon.
- 1.3 We acknowledge the substantial amount of work undertaken in the catchment by many landowners and organisations to restore the health of the lagoon.
- 1.4 Improvement of the health of the lagoon is an important objective for the landowners. Landowners also recognise that long term environmental benefits from change can take some time (years) to achieve.
- 1.5 Federated Farmers considers the opening regime is a critical and ongoing part of the broader work undertaken in the catchment, which will help to safeguard the wellbeing of the lagoon and the productive potential of adjacent farmland.
- 1.6 We support the resource consent application to periodically open Lake Waituna from the Lake Waituna Control Association.

Decision Sought

- 1.7 **Approve the application (Land Use Consent and Coastal Permit application APP-20211669) to open Lake Waituna with the proposed consent conditions specified in the application.**

2. REASONS FOR SUPPORT

Need for an Opening Regime

- 2.1 As a waterbody fed by three primary creeks and enclosed by the beach, with no natural ability to drain, Waituna Lagoon requires periodic opening to protect adjacent farmland from being flooded.
- 2.2 Without the ability to open the Lagoon when water levels rise, freshwater eventually inundates farmland and roads making it impossible to farm the land, or even access it. Inundation also impacts public infrastructure including access roads and bridges.
- 2.3 An opening regime is critical to enable farmers at the bottom end of the catchment to farm.

2.4 A well-managed opening regime supports both environmental objectives and farming families who have lived in the catchment area for generations. Farming families are the a cornerstone of our of catchment communities. Approaches that see and recognise the environment, where a wide range of interrelated environmental, social, and economic services are provided and supported. These approaches need to consider, recognise and value the lives and well-being of the families who live in these communities.

Benefits of an Opening Regime

2.5 As discussed in the Lake Waituna Control Association's resource consent application, the main benefits of opening the lagoon are twofold.

2.6 Firstly, it reduces the water levels within the lagoon, preventing flooding and enabling better drainage of properties further up the catchment.

2.7 Secondly, it flushes nutrients and sediment washed down from the catchment. At high levels these create a risk of eutrophication, so flushing these out benefits the ecosystem within the Lagoon.

2.8 There are also spill-over benefits from opening the lagoon, as it enables:

- the entry of brown trout from the sea into the lagoon
- tuna, kana kana and Īnanga to gain access to the lagoon. These species need to access inland waterways in order to carry out their migratory life cycles
- a suitable habitat for wader birds when the lagoon level is reduced (the habitat for a range of wading birds was a key consideration when the neighbouring wetland was designated a Ramsar Wetland of International Importance in 1976)
- anglers are attracted to the lagoon when it's open to the sea (October to April)
- plants to thrive (i.e. there are some plants that need different water levels).

Consistency with Relevant Planning Documents

2.9 Federated Farmers supports the analysis in the resource consent application of the opening proposal's consistency with key objectives, policies, and rules.

2.10 The *Strategy and Action Plan for Waituna* emphasised the need for balance when considering the Waituna catchment. Specifically, the health and wellbeing of the environment needs to be balanced with the health and wellbeing of the catchment community. A key aspect of community wellbeing is the ability to productively farm the land.

Long-term consent continuation

- 2.11 The Lake Waituna Control Association is applying for a renewal of the existing consent for a timeframe of 20 years.
- 2.12 Federated Farmers considers a 20-year timeframe is appropriate, because short term consents are not the most effective mechanism to bring about effective long-term solutions that benefit both the lagoon and impacted farming families.
- 2.13 Previous consent applications had looked at shorter time frames for consent due to the uncertainty of available information, however the LWCA consider that a shorter term is unlikely to improve management of the lagoon as long term environmental benefits are best achieved through a long term vision for the catchment as proposed by LWCA. The LWCA recognise that as part of this long term option conditions that control lake openings can being managed via a review or amendment application.
- 2.14 It is critical that the ability to open the lagoon is retained at a practical level, as it is a key part of the strategy for improving water quality and land drainage. Without an opening regime to keep the Lagoon water level below 2.0m, impacted farming families in the lower end of the catchment will not be able to maintain financially viable businesses.
- 2.15 To ensure landowners can productively farm the land, we recommend there are no restrictions placed on the timing of the opening of the lagoon and that the current existing limits are retained.

3. ABOUT FEDERATED FARMERS

- 3.1 Federated Farmers of New Zealand is a voluntary, member-based organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.
- 3.2 The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
- Our members may operate their business in a fair and flexible commercial environment;
 - Our members' families and their staff have access to services essential to the needs of the rural community; and
 - Our members adopt responsible management and environmental practices.