

4 September 2025

OMS1601
2025 EDSW

Hon Penny Simmonds
Minister for Environment
Parliament Buildings
Wellington

Dear Minister Simmonds,

BRIEFING GROUNDWATER MANAGEMENT IN SANTOFT

Purpose

The purpose of this briefing is to provide an update on groundwater management in the Santoft area, located in the coastal area of the Rangitikei Groundwater Management Area (GWMA). It outlines observed groundwater decline, the consent renewal process currently underway, and the steps Horizons Regional Council is taking to balance resource availability with the need for sustainable management into the future.

Key Points

- Agriculture is central to the region's economy and community wellbeing.
- Reliable access to groundwater is a vital enabler of farming in the Santoft area.
- Long-term monitoring shows groundwater levels are declining in parts of the Rangitikei GWMZ, raising concerns about future reliability and potential impacts such as saltwater intrusion and effects on local surface water bodies such as lakes, and wetlands.
- The Regional Policy Statement (RPS) requires that groundwater takes do not cause a significant adverse effect on long-term groundwater yield. Meeting this objective is critical to ensuring the resource remains available for both present and future users.
- Numerical groundwater models developed in 2017 and updated in 2023 confirm that abstraction is a key driver of declining levels. While refinements to the model are underway, the monitoring evidence and modelling results provide sufficient basis for a precautionary approach to consent decisions.
- A group of renewal applications was lodged ahead of the June/July 2024 common expiry date for groundwater consents. These are being processed collectively while also considering each applications unique elements, with all applicants currently operating under existing use rights.
- Horizons is applying a precautionary, catchment-wide approach to managing groundwater consents, supported by technical review, peer assessment, and engagement with consent holders and iwi.
- Options under consideration include shorter-term consents with less restrictive conditions, or longer-term consents with stronger safeguards such as trigger levels to manage groundwater decline.
- This approach seeks to provide farmers with certainty in the short and medium term while ensuring the resource is managed sustainably in line with the RPS.

1. Economic and Planning Context

- 1.1 Farming is a cornerstone of the regional economy, and reliable access to groundwater is essential for the viability of current farming operations. Irrigated agriculture in particular depends on continued water abstraction to maintain productivity and support associated industries and employment in the region.
- 1.2 Groundwater is a vital enabler of farming in the Santoft area, supporting irrigated agriculture which is an important contributor to the regional economy. Continued access to groundwater allows farms to maintain productivity and provides flow-on benefits for associated industries, local employment, and community stability.
- 1.3 At the same time, groundwater is a finite resource that requires careful stewardship. Horizons Regional Policy Statement (RPS) sets out the objective that groundwater abstraction must not cause a significant adverse effect on long-term groundwater yield. This obligation reinforces the need to balance current economic benefits with the long-term sustainability of the resource.
- 1.4 Under the One Plan, the abstraction of groundwater is a Discretionary Activity under Rule LF-TUD-R46. This means all effects relating to an application must be assessed. While there is sufficient water available in the allocation framework, consent applicants need to consider the impact of their abstraction on groundwater levels and the overall resource.

Additional information on the planning framework can be found in Appendix 1.

2. Groundwater Monitoring

- 2.1 A 2013 review of the data from Horizons monitoring network showed that groundwater levels in parts of the Santoft area have been declining since around 2005. A subsequent review in 2017, incorporating both updated data and modelling, confirmed the continuation of these trends. Declining groundwater levels threaten both users—by reducing supply reliability and potentially increasing salinity—and the environment, affecting wetlands, coastal lakes, and raising the risk of soil salinization from saltwater intrusion.

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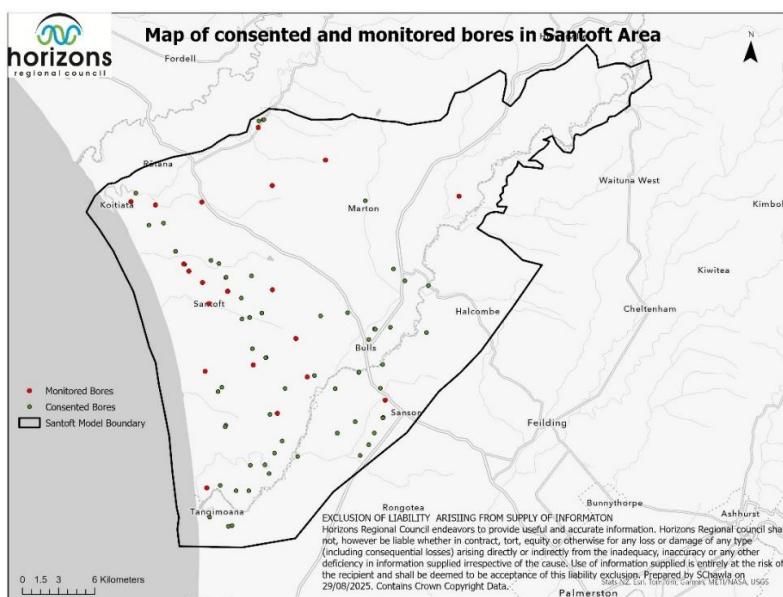


Figure 1: Map of Santoft Area showing consented and monitored bores.

3. Groundwater Level Modelling and Assessment

- 3.1 To understand these trends, Horizons commissioned a numerical groundwater model in 2017. The model, which was peer reviewed, found that abstraction was the most likely driver of decline, rather than changes to recharge. The model results suggested that the groundwater system is unlikely to reach a steady state within the five-year modelling period. Instead, groundwater levels are expected to continue declining beyond five years before eventually stabilising at a lower level.
- 3.2 An updated model was developed in 2023, incorporating additional data and updated methods. This modelling confirmed the long-term declining trend in groundwater levels and suggested the decline is a result of increased abstraction. It also indicated that groundwater levels would continue to decline if abstraction remained the same or increased, and that stabilisation would require a reduction in use of around 30 percent.
- 3.3 A peer review of the 2023 updated model identified opportunities to strengthen boundary assumptions, parameter settings, and sensitivity analysis. While further refinement of the model is required to improve its accuracy, the overall findings remain consistent with monitoring data and earlier work.
- 3.4 New groundwater modelling will be developed with independent expert oversight to ensure the technical basis for future groundwater management is as robust as possible. In the meantime, the current evidence supports applying a precautionary approach in processing consent applications.
- 3.5 Current technical work is focused on tasks directly related to the processing of these applications, including the refinement of groundwater trigger levels, peer review of methodologies, and incorporation of the most recent monitoring data.

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Copies of the 2017 and 2023 modelling reports can be found in Appendix 2 and Appendix 3 respectively. The 2024 peer review can be found in Appendix 4.

4. Consent Process

- 4.1 A number of consents for groundwater abstraction in the Santoft area expired in June/July 2024, consistent with the Horizons' policy of aligning expiry dates by catchment. Renewal applications were lodged within the statutory timeframes, which enabled Horizons to exercise discretion to allow continued abstraction under existing use rights while new applications are considered.
- 4.2 Draft conditions have been prepared for two broad consent pathways. One provides a five-year term with less restrictive conditions, offering short-term certainty for applicants. The other provides for a 15-year term but incorporates stronger safeguards, including the use of groundwater trigger levels to manage potential declines. Applicants have been asked to indicate which pathway they prefer. These timeframes are consistent with those granted by a number of other Regional Councils as well as the terms of consent previously issued to these applicants.

Draft conditions are included in Appendix 5.

- 4.3 Some further information requests remain outstanding, including cultural effects. Applications are currently on hold until this information is provided, as Horizons cannot proceed without this information in determining the appropriate notification pathway.

Confirming their preferred term of consent option is also important to inform the notification decision.

A table outlining the status of applications is included in Appendix 6.

4.4 The majority of the resource consent applications currently considered by Horizons are renewal applications. The pre-cursor consents were processed and granted for various terms of consent (between 8-16 years), expiring in June/July 2024. Given the uncertainty regarding groundwater decline at the time those consents were considered Horizons adopted a precautionary approach in relation to the conditions that were imposed, which in several cases included 'trigger level' conditions.

5. Cultural Considerations

5.1 The applications are within the rohe of Ngā Wairiki Ngāti Apa and (for some applicants) Ngā Hapū o Te Iwi o Whanganui (previously Whanganui Land Settlement Trust). Given the Discretionary Activity status of the applications, consideration of the effects on cultural values of these applications is required. This is supported by Objectives and Policies in the One Plan that seek to ensure that consent applicants engage with iwi and hapu to understand the impact of activities on them. Given the onus is on consent applicants to provide the information on the effects of their proposed activities in their applications, the applications have been placed on hold for an assessment of effects on cultural values, informed by feedback from local iwi (given they are the holder of this information).

5.2 We acknowledge that iwi often have limited resources to respond to requests for information or feedback by consent applicants, while also juggling requests from government agencies, local authorities and other parties.

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6. Engagement

6.1 Engagement has been a core part of Horizons' approach to managing groundwater issues in the Santoft area. The intent has been to build trust and transparency with consent applicants, iwi, and technical experts, while ensuring decisions are informed by the best available information.

6.2 Horizons has endeavoured to work closely with applicants through workshops, written correspondence, and circulation of draft consent conditions. Engagement has also extended to iwi, who have been provided with reports, draft conditions, and opportunities to raise questions and request further information.

6.3 Key steps have included:

- Workshops with farmers and consent holders – multiple sessions in 2023 and 2024 to present monitoring and modelling results, explain technical findings, and discuss consent pathways. These included opportunities for applicants to question consultants directly.
- Regular written updates – follow-up emails and letters summarising workshop outcomes, responding to applicant questions, and providing draft conditions for review.
- Access to technical information – sharing of groundwater monitoring data, modelling reports, and independent peer reviews with applicants and iwi.
- Draft consent conditions – circulated to applicants in advance to support transparency and enable feedback before decisions are made.
- Engagement with iwi – while applicants carry the primary responsibility for consulting with iwi, Horizons has supported this process by providing iwi with

- reports, draft conditions, and opportunities to raise cultural concerns or seek further information.
- Independent peer review – commissioning external experts to review groundwater modelling and trigger level methodologies, with findings shared openly with applicants.
- 6.4 Despite these efforts, formal engagement responses have been limited. While some applicants have provided feedback and confirmed preferred consent pathways, others have not yet responded to requests for information or draft conditions. Although farmers indicated they held additional groundwater data, only one applicant has provided records to date. This has limited Horizons ability to incorporate all locally held information into technical assessments.
- 6.5 While the costs and time associated with this engagement (and technical work) could be passed on to consent applicants, Horizons has absorbed these to date, meaning the costs are currently being borne by the wider regional ratepayer base.
- 6.6 Overall, this engagement has been resource-intensive but is intended to reduce conflict, build trust, and support sustainable long term groundwater management in the Santoff area over the long term.

A timeline is included as Appendix 7.

7. Next Steps

- 7.1 Progress on applications depends on outstanding information being provided, particularly regarding cultural effects. Horizons will continue to work with applicants to support the provision of this information so applications can move forward to notification and decision. 5
- 7.2 The methodology for setting and applying groundwater trigger levels is being finalised. This is being peer reviewed to ensure technical robustness.
- 7.3 Once additional information is received from applicants, Horizons' officers will proceed with notification decisions and the finalisation of consent conditions.
- 7.4 Updated modelling work will continue, with independent expert oversight, to inform longer-term groundwater management beyond the current round of consent processing.

8. Options

- 8.1 While consenting pathways have been suggested and are considered by Horizons to provide a pragmatic balance between supply certainty for farmers and sustainable long-term resource management, applicants have several alternative options:
- a) **Individual consents:** Rather than processing applications as a group, Horizons could assess consents individually on a 'first in, first served' basis. This approach risks a competitive 'water grab' among applicants.
 - b) **Declining the proposed pathway:** Applicants may choose to decline the suggested consenting pathway (e.g., trigger level conditions). Given concerns about groundwater decline, this could result in effects being considered 'more than minor' and may trigger public notification.
 - c) **Proceeding with limited cultural effects:** Applicants with only cultural effects to address, who agree to the proposed pathway, could request that Council make a notification decision. This would likely identify iwi as affected parties, with limited

notification as the outcome. The benefit is a defined timeframe, allowing the consent process to progress. If no submissions are received, Horizons could make a decision. Submissions, however, may require a pre-hearing meeting or hearing.

- d) **Refusing to provide further information:** Applicants may refuse to supply the requested further information. Under the RMA, this is permissible but results in automatic public notification

9. Conclusion

- 9.1 Groundwater is both a key enabler of farming and the regional economy in the Santof area, and a finite resource that must be carefully managed to ensure its long-term availability. Monitoring and modelling evidence confirm that groundwater levels are declining, with abstraction identified as a contributing factor.
- 9.2 The challenge for Horizons is to balance the immediate need to support farming operations and the regional economy with the statutory requirement to manage groundwater sustainably. If current trends continue unchecked, there is a risk that the RPS objective—to avoid significant adverse effects on long-term groundwater yield—will not be met. This would have consequences for both the long-term viability of farming and the environment.
- 9.3 In response, Horizons is taking a precautionary, catchment-wide approach to consent processing. This is underpinned by technical review, independent peer assessment, and early engagement with consent holders and iwi. Draft conditions have been developed to provide options for both shorter- and longer-term consents, balancing certainty for farmers with safeguards to manage groundwater decline.
- 9.4 This approach seeks to support the continued viability of farming in the region while ensuring the resource remains available for future generations, consistent with the requirements of the RPS.

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Yours sincerely,



Lizzie Daly
GROUP MANAGER STRATEGY REGULATION AND SCIENCE

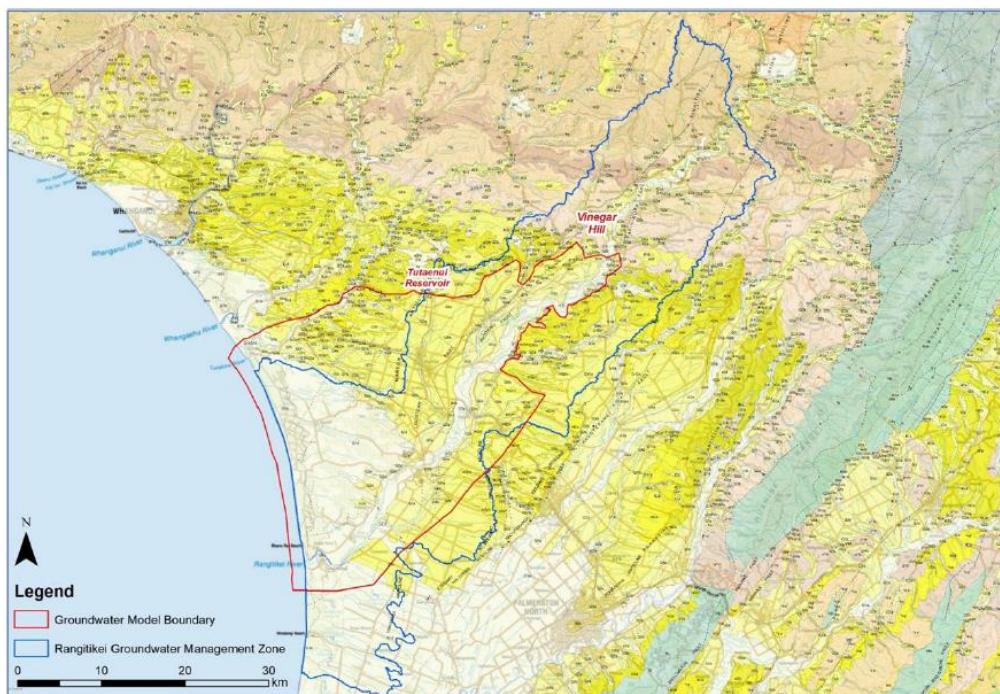
Copied to Michael McCartney – CE Horizons

Enclosures Appendices as listed below

Appendix 1: Planning Framework

One Plan (Regional Policy Statement (RPS) and Regional Plan (RP))

The One Plan sets out an allocation framework for groundwater, supported by Objectives and Policies in the Regional Policy Statement (RPS) and the Regional Plan (RP). When the One Plan was drafted and made operative (notified in 2007, made operative in 2014), the groundwater allocation volumes for each groundwater management area in the Horizons Region was specified at 5% of the long-term average rainfall cross each zone in the One Plan. This was based on the data available at that time. While there is groundwater available for allocation in the Rangitikei Groundwater Management Area this is a substantially larger area than the Santoft area which is subject to concern regarding groundwater levels. The declining groundwater levels suggest that this specific area is facing pressure from increased abstraction (in this area for irrigation etc).



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Figure 2: Rangitikei Groundwater Management Area and Santoft Model Area – Source 'Santoft Groundwater Model and Rangitikei Groundwater Management Zone Allocation Limit Technical Review, Stantec September 2024'

While there is sufficient water available in the allocation framework, consent applicants need to consider the impact of their abstraction on groundwater levels and the overall resource. This is supported by objectives in the RPS that requires takes to "not cause a significant adverse effect on the long-term groundwater yield". It is in that context that we are carefully considering these applications to ensure that groundwater is sustainably managed for long term use.

Under the One Plan, the abstraction of groundwater is a Discretionary Activity under Rule LF-TUD-R46. This means that Horizons must assess all effects relating to an application.

Appendix 2: Report on Santoft Groundwater Model, PDP, 2017

Provided as separate attachment

Appendix 3: Rangitīkei Groundwater Management Zone Allocation Limit, PDP,
September 2023

Provided as separate attachment

Appendix 4: Santoft Groundwater Model and Rangitīkei Management Zone Allocation
Limit Technical Review, Stantec, September 2024

Provided as separate attachment

Appendix 5: Draft Conditions

Provided as separate attachment – 5 year term

Provided as separate attachment – 15 year term

Appendix 6: Table of application and status at 3 September 2025

Applicant	Application Number(s)	Status
Hyde Park Farms	APP-2012015720.03	On hold for further information (s92 RMA) for cultural effects
	APP-2012015720.04	On hold for further information (s92 RMA) for cultural effects
Hopkins Farming Group	APP-2007012434.01	On hold for further information (s92 RMA) for cultural effects
	APP-2008013337.01	On hold for further information (s92) for reasonable use assessment, effects on neighbouring bores, assessment of statutory provisions and cultural effects.
The Plains Farms	APP-2015200537.01	On hold for further information (s92 RMA) for cultural effects
Regent Parks Farms	APP-2013016206.01	On hold for further information (s92 RMA) for reasonable use assessment, effects on groundwater resource (or confirmation of short or medium term consenting option), effects on neighbouring bores, assessment of statutory provisions and cultural effects.
	APP-2025205049.01	On hold for further information (s92 RMA) for effects on neighbouring bores and cultural effects
Sanderry Farms	APP-2018202056.03	On hold for further information (s92 RMA) for reasonable use assessment, effects on groundwater resource (or confirmation of short or medium term consenting option), effects on neighbouring bores, assessment of statutory provisions and cultural effects. 10
Edwin Jurgens	APP-200813128.01	On hold for further information (s92 RMA) for assessment of statutory provisions and cultural effects
Killarney Farms	APP-2008012713.01	On hold for further information (s92 RMA) for effects on neighbouring bores, groundwater effects and cultural effects.
Waitatapia Land Limited P/Ship	APP-2010014291.01	On hold for further information (s92 RMA) for groundwater data and cultural effects.
Tunnel Hill Ltd	APP-2008012899.01	On hold for further information (s92 RMA) for cultural effects

Appendix 7: Timeline

2013–2014

- 2013: A review of Horizons monitoring data showed long-term declining groundwater trends in several monitoring bores in the Santoft area. The findings raised early concerns about the groundwater levels.
- In 2014, Horizons undertook a piezometric survey across the Rangitīkei and Turakina Groundwater Management Zones (GWMZ) to indicate the groundwater contours in the area.

2017

- Horizons engaged a consultant, Pattle Delamore Partners (PDP) to develop a numerical groundwater model to simulate the hydrological system. The draft report of the numerical groundwater model was peer-reviewed and finalised in 2017.
- The report concluded that the observed groundwater declines were most likely due to increased abstraction rather than reduced recharge to the groundwater system.
- The model results suggested that the groundwater system is unlikely to reach a steady state within the five-year modelling period. Instead, groundwater levels are expected to continue declining beyond five years before eventually stabilising at a lower level.
- The report recommended further assessment and development of groundwater level thresholds.

2021

- A consent application lodged in 2021 provided further evidence of decline. It showed both lower groundwater levels and higher electrical conductivity, the latter being a warning sign of potential saline intrusion from the coast.

2023

- March: PDP was commissioned to update the 2017 groundwater model, incorporating additional monitoring data and refined modelling techniques.
- September: The updated model was completed. It reinforced earlier findings, noting:
 - a) some observed groundwater levels are showing a long-term declining trend;
 - b) modelling suggesting the decline is a result of increased abstraction; and
 - c) groundwater levels would continue to decline under current or increased use, but stabilisation was possible if abstraction was reduced by around 30 percent.
- September: A consent holder contacted Horizons to organise a meeting of local farmers (the “farming group”) to discuss the upcoming expiry of consents in July 2024 and the implications of the updated model. In part, the farming group were seeking to discuss how to minimise the information required to be supplied as part of the renewal process. This meeting request aligned with the release of the 2023 modelling report.
- 16 November: Meeting held with farming group, attended by council officers and PDP consultant. The session presented monitoring results, explained the groundwater modelling, modelling results, and addressed questions from attendees. While consenting matters were also on the agenda, the focus was primarily on the modelling and groundwater level data. A large number of questions were raised, some of which were noted for follow-up responses. Farmers also expressed concerns about the accuracy of the data and indicated that they hold additional groundwater records not yet shared with Horizons, which they believe do not align with the evidence of long-term groundwater decline. Despite requests, (as of September 2025) only one applicant subsequently provided additional groundwater data.
- 12 December: Horizons officers circulated a detailed follow-up email answering farmers’ questions.
- Horizons officers contacted consent holders who held consents expiring on 1 July 2024 to advise them of the importance of lodging replacement consent applications a minimum of six months prior to consent expiry to retain existing use rights under s124 of the RMA, but no later than 3 months prior to expiry. A formal letter was sent

12 months prior to expiry, discussion on this was held at the workshop and in a follow up email on 22 November.

2024

- May: Stantec were engaged to undertake a peer review of the 2023 groundwater model.
- June–July: Eighteen groundwater consents reached their common expiry date.
 - Six renewal applications were lodged more than six months before expiry, so automatically retained existing use rights under section 124 of the RMA.
 - Twelve were lodged within 3–6 months of expiry. Horizons exercised its discretion under section 124 to allow these takes to continue while applications were processed.
 - One application was incomplete and returned. The associated consent expired without replacement.
 - The remainder of applications were accepted as being complete under s88 of the RMA, while noting that none of the applications included an assessment of effects of the takes on cultural values and in some cases there were other matters. It was determined that the assessment of effects on cultural values could be managed via a s92 further information process.
- September: Stantec completed a peer review of the 2023 groundwater model. The review supported the overall conclusion of declining levels but identified limitations in boundary assumptions, parameter settings, and sensitivity analysis. It recommended refinement to improve confidence for decision-making.
- 24 September: Peer review findings were shared with applicants. Horizons suggested further workshops to explain the results and discuss implications for consenting.
- 20 November: First workshop hosted by council officers, with farming group. Stantec presented their review and explained groundwater modelling processes. This provided opportunity for applicants to directly question technical experts.
- Between workshops Horizons officers had been working on possible consenting pathways to manage the groundwater levels to provide some certainty to the farming group while ensuring that the resource is appropriately managed.
- 4 December: Second workshop focused on consenting pathways. Attendees also tabled a consenting option for consideration. The draft options pre-circulated to attendees from Horizons included:
 - a) Short term consent (up to 5 years) with water permit conditions, including groundwater level monitoring and management plans to ensure water is being used efficiently;
 - b) Medium term consent (up to 15 years) with all conditions from the short-term consent option and trigger level conditions (reduction in annual volume if groundwater levels continue to drop below specified levels);
 - c) Long term consent (greater than 15 years) was not supported by Horizons given pressure on the groundwater system and the uncertainty of effects. In addition terms longer than 15 years are not typically consented for irrigation takes in the Horizons region.
- December: Horizons officers followed up by email asking applicants to confirm their preferred consent option and reminding them of outstanding further information requests.

Late 2024 – Early 2025

- By early 2025, nine applicants had confirmed their preferred consent option: two chose the five-year pathway, six chose the 15-year pathway, and one sought a longer 30-year consent (not supported by Horizons). Three applicants had not responded.
- Horizons officers began refining draft consent conditions, including technical details for groundwater trigger levels, monitoring requirements, and efficiency assessments.
- A short-term consent was issued to one user in February 2025, whose bore had collapsed, to enable abstraction to be moved to the new bore and therefore enable abstraction to continue while the long-term consent application is processed.

2025

- 16 July: One farming group member phoned, expressing concern that draft conditions had not been agreed in principle by the group and requesting a workshop before conditions were finalised.
- 18 July: Horizons officers circulated draft conditions for both the five- and 15-year pathways to applicants for review and comment.
- 7 August: An applicant emailed asking about next steps. Horizons officers responded on 12 August, outlining the process.
- Informal feedback was received via a consultant (not formally engaged by applicants), who raised concerns about Horizons' understanding of farming systems and offered training.
- To date, no formal feedback, questions, or comments have been received on the draft conditions.