

Responses to questions from Commissioner Loeffering to reporting officer during the hearing for the Waihola STP renewal - RM15.364

During the hearing Commissioner Loeffering requested responses to the following matters from the reporting officer:

1. Clarification regarding any requirement for a consent for the discharge from the base of Waihola WWTP ponds
2. Provision of the correctly labelled figures 5-9 from the Section 42A Report.
3. Clarification if the discharge location is within the coastal environment as defined by New Zealand Coastal Policy Statement

1. Discharges from the base of the treatment ponds

Rule 12.A.1.3 of the Regional Plan Water for Otago states:

*12.A.1.3 The discharge of human sewage through any existing on-site waste water treatment system onto or into land is a **permitted** activity, providing:*

- (a) The discharge was lawfully carried out without resource consent prior to 28 February 1998; and*
- (b) There is no direct discharge of human sewage, or effluent derived from it, to water in any water body, drain, water race, or the coastal marine area; and*
- (c) Effluent from the system does not run off to any other person's property; and*
- (d) The discharge does not cause flooding of any other person's property, erosion, land instability, sedimentation or property damage.*

Clause 12.A.1.3(a) is met as the Waihola plant was consented prior to 1998 (1986) and compliance monitoring has not indicated evidence of the effects outlined in clauses (b)-(d) occurring.

2. Corrected figures for Figure 5-9 of Section 42A Report

The figures for sampling results were mislabelled in the s42A report when the figures from the 2020 Compliance Audit report were replaced with those from the 2021 Compliance Audit. The graph for BOD was included twice result in the graphs being out of sequence.

The figures that follow are correctly labelled. No graph was provided for phosphorus in the 2021 Audit.

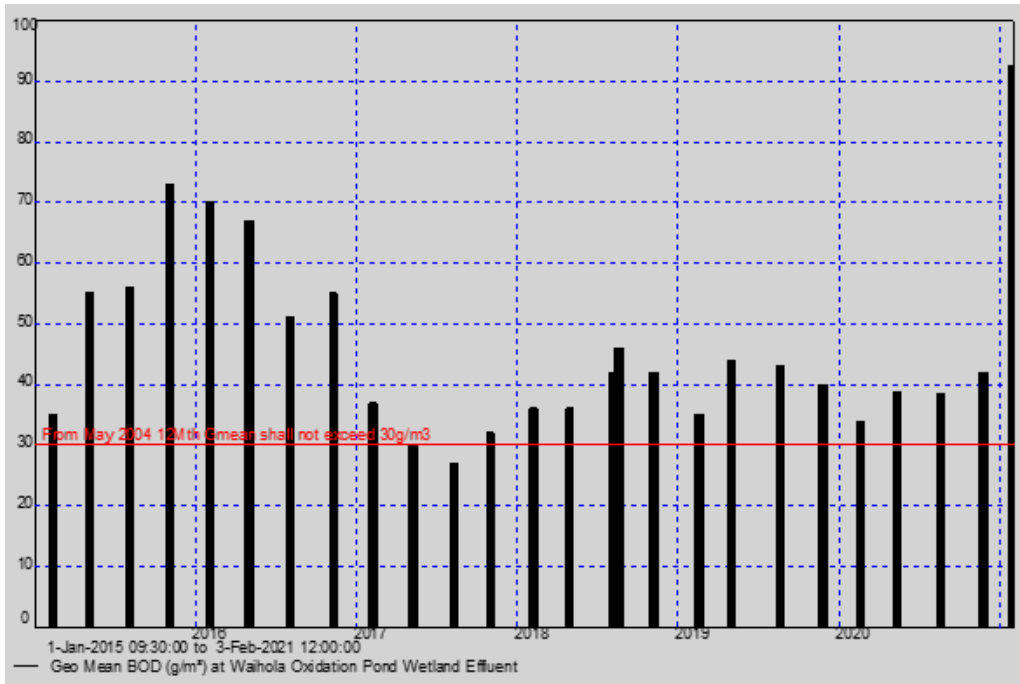


Figure 1: Sampling results for BOD₅ maximums between January 2015 and January 2021. (Source: Compliance Audit Report 2021)

Figure 1 indicates that BOD₅ has remained non-compliant with the Geomean since Jan 2015 (apart from on two occasions in 2017).

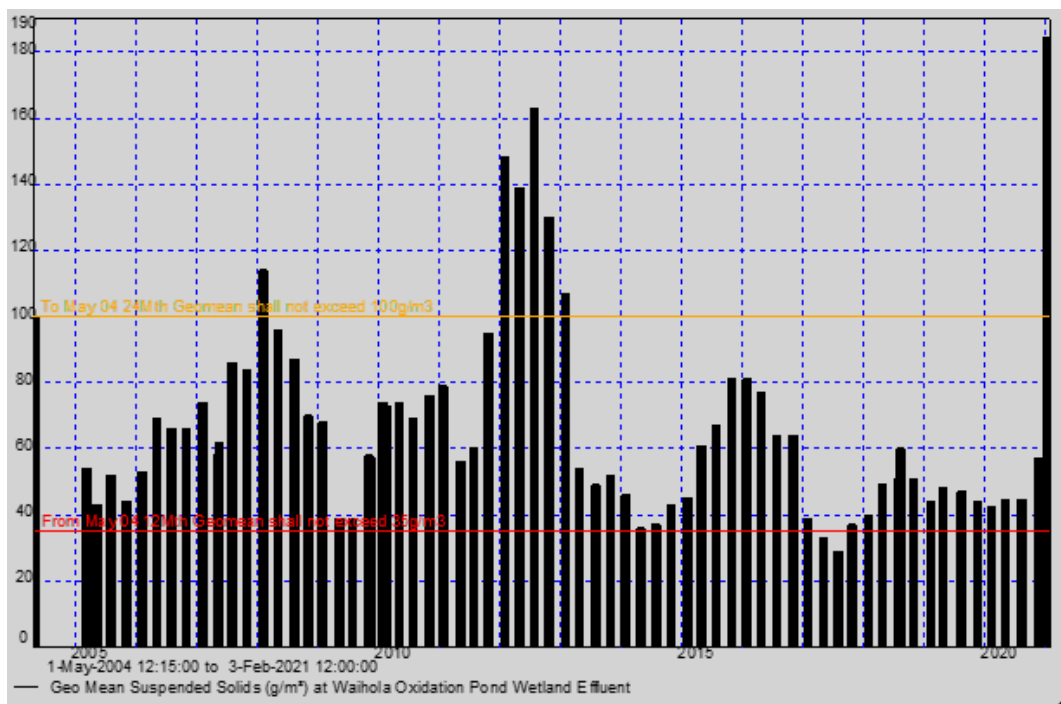


Figure 2: Sampling results for suspended solids between January 2015 and January 2021. Source: Compliance Audit Report dated February 2020.

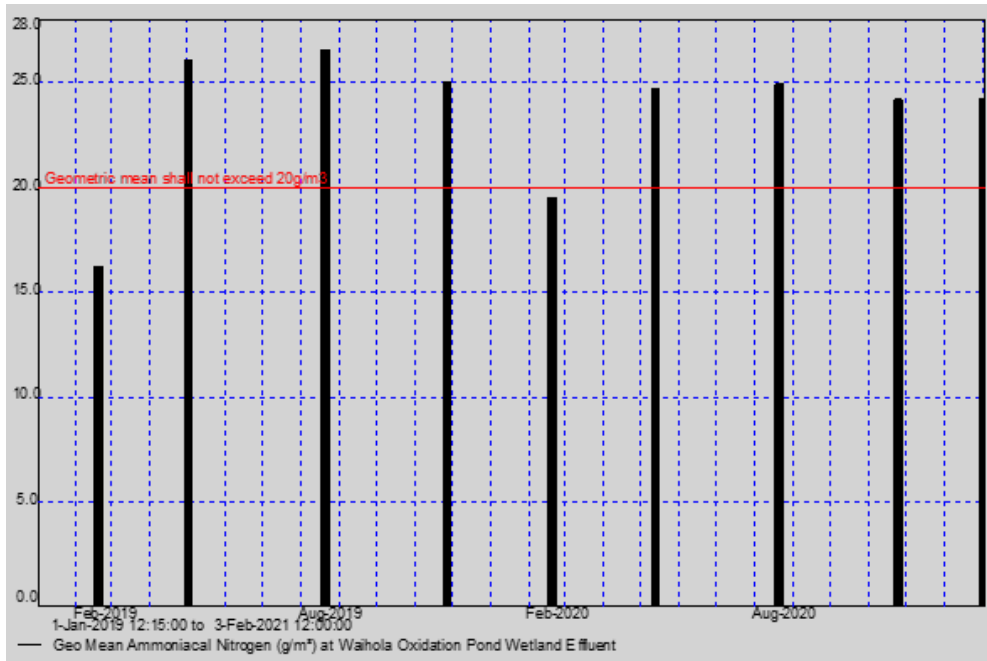


Figure 3: Sampling results for ammoniacal nitrogen between January 2015 and January 2021. (Source: Compliance Audit Report 2021)

No graph of phosphorus sampling results was include in the 2021 audit as the discharge remained within consented limits for phosphorus during the 2020 monitoring year.

Figure 4: Sampling results for total phosphorus between January 2015 and January 2020. (Source: Compliance Audit Report 2021)

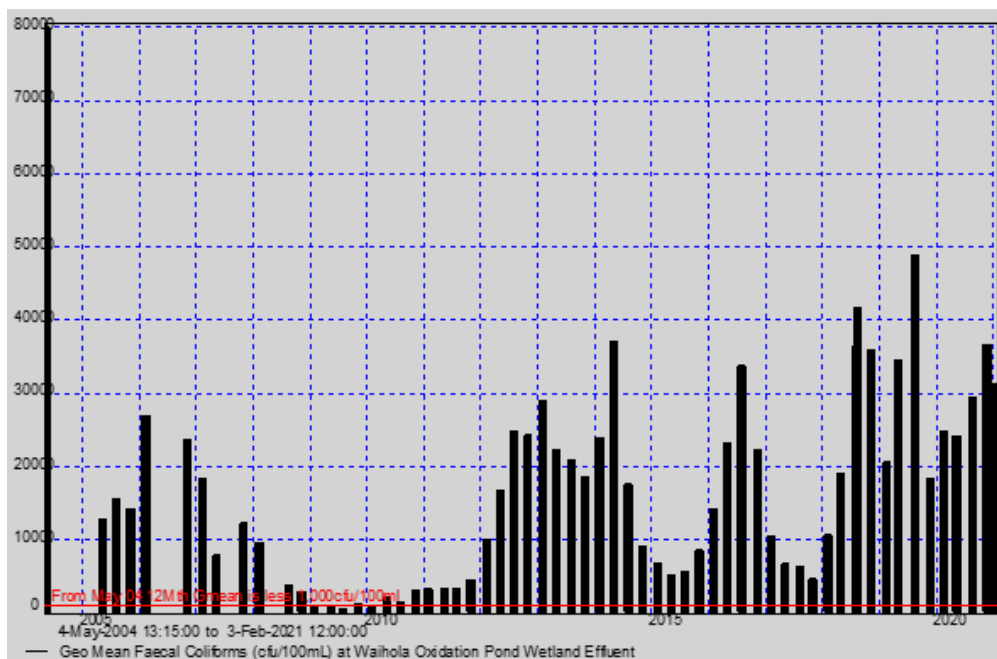


Figure 5: Sampling results for faecal coliforms between January 2015 and January 2020. (Source: Compliance Audit Report 2021)

3. Is the location of the discharge within the coastal environment

The Regional Plan: Coast for Otago (RPC) does not currently map coastal environments as defined by the New Zealand Coastal Policy Statement Policy 1. The Otago Regional Council has undertaken preliminary investigations regarding the extent of the coastal environment as required by New Zealand Coastal Policy Statement Policy 1 however these have not been adopted by Council or consulted on at this time.

Figure 1 is an extract from the mapping undertaken within the Dunedin District showing the extent of the coastal environment in the Dunedin District. Figure 2 is from the same document and at a more useful scale. The defining boundary of the upstream extent of the coastal environment on the Taieri can be seen to follow the State Highway 1/ Main trunk railway line. Figure 3 shows the location of the discharge point relative to the location of the SH1/railway. This indicates that, based on the best information currently available, the discharge occurs outside the coastal environment.

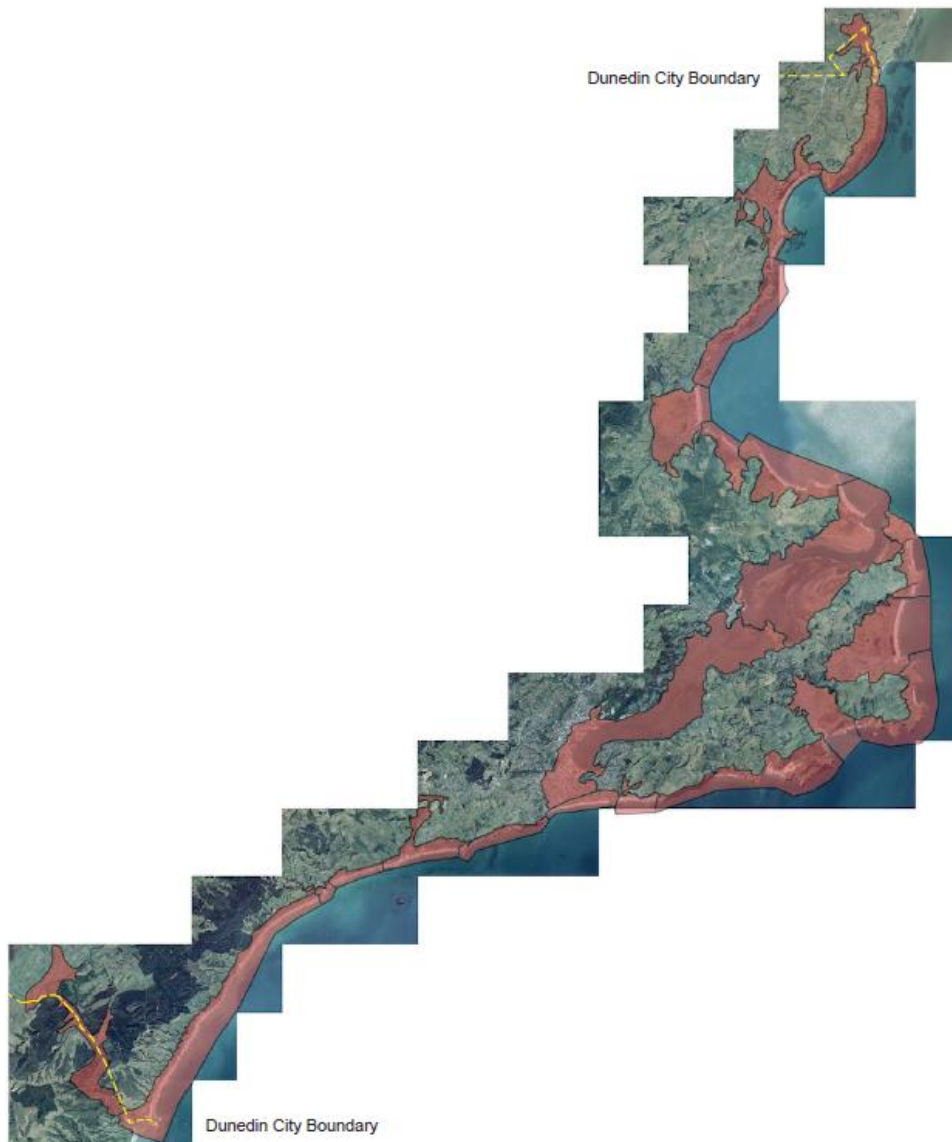


Figure 1 : Dunedin City Coastal Environment

Figure 1: Extent of Coastal Environment

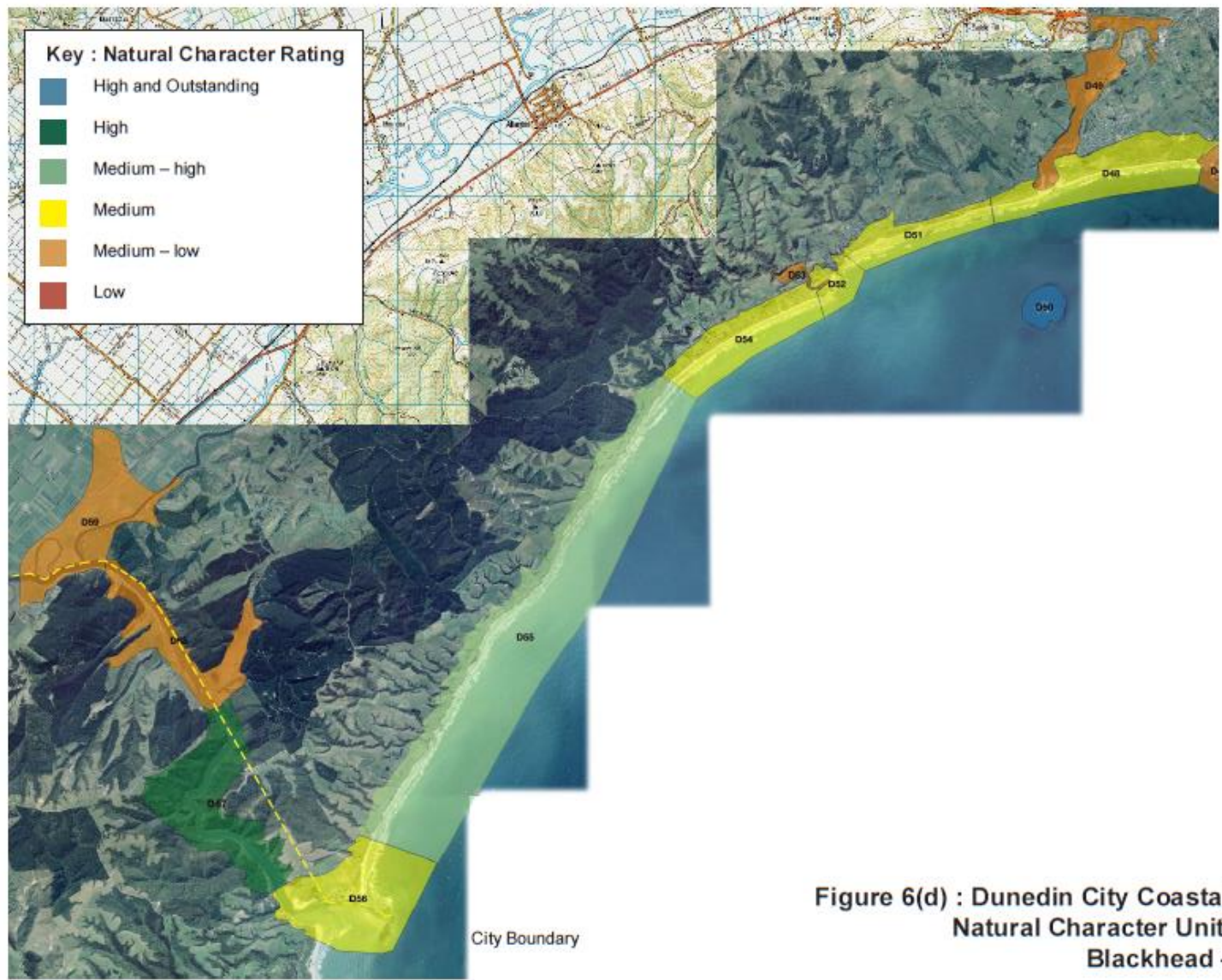


Figure 6(d) : Dunedin City Coastal Environment
 Natural Character Units and Ratings
 Blackhead – Taieri Mouth

Figure 2: Natural character units within the coastal environment



Figure 3: Location of existing/ proposed discharge site (RM15.364/2002.046)

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