

RM26.297

21 August 2026

Via email to: Simon Mason (simon.mason@qldc.govt.nz) Claire Perkins (claire@landpro.co.nz)

Dear Simon

Request for further information under section 92(1) of the Resource Management Act 1991 (the Act) – Consent Application Number RM26.297

Thank you for your application to:

- discharge treated wastewater to the Kawarau River from the Shotover Wastewater Treatment Plant;
- discharge odour to air from the Shotover Wastewater Treatment Plant;
- disturb the bed of the Kawarau River and to place and maintain an outfall structure and/or pipe in the bed of the Kawarau River;
- discharge sediment-laden water associated with the construction and maintenance of the outfall and/or pipe to the Kawarau River; and
- to take and use groundwater for construction-phase dewatering.

An initial assessment of your application has been made by myself and the following experts that are providing a technical audit of the application:

- Mr Tim Baker, Groundwater;
- Dr John (Jack) McConchie, Fluvial Geomorphology;
- Mr Paul Wilson, Recreation; and
- Mr Nigel Parker, Landscape.

There are other experts providing technical audit of the application and we anticipate that we will provide a further follow up request for further information when these technical reviews are received.

To be able to make a full assessment of the application, I request the following information under section 92(1) of the Resource Management Act (the Act). This is supplementary to the request for information dated 20 July 2026.

Groundwater Levels and Quality

An independent Groundwater review undertaken by Mr Baker on behalf of ORC concludes that the effects on groundwater (levels and quality) from the proposed discharge and dewatering will be relatively minor and manageable. The following additional information is requested:

1. Please provide an assessment/quantification of the potential seepage from the proposed calamity pond to groundwater when the pond is in use, including the assumptions and

methodology used to estimate the potential seepage volume and any associated effects on groundwater quality. This information is required to assess the effects of seepage from the calamity pond.

2. The Groundwater review recommends that ongoing monitoring of groundwater around the WWTP should be undertaken to monitor the long-term operation of the WWTP. A review of the most recent O+M and EMP shows that there is no monitoring undertaken in the locality of the WWTP. Please advise whether the Applicant proposes to undertake any ongoing groundwater monitoring as part of the long-term operation of the WWTP, including the proposed monitoring locations, parameters, frequency and duration. This information is required to understand the accuracy of your assessment of effects on groundwater quality.

Fluvial Geomorphology

The proposed outfall has the potential to interact with the fluvial geomorphological processes of the Kawarau River, affecting its behaviour and characteristics. The following information is requested on the basis of an independent review undertaken by Dr McConchie on behalf of the ORC to understand the potential effects associated with the proposed outfall:

3. Please provide detailed design information for each of the two proposed discharge point options. This should include design schematics (including the proposed configuration of the discharge point and/or diffusers), dimensions, height relative to the bed, materials and the extent of encroachment into the Kawarau River.
4. Please describe the existing fluvial geomorphic environment in the vicinity of the proposed discharge point location in the Kawarau River including the flow regime, channel characteristics, bed and bank stability, sediment transport regime, scour and erosion processes.
5. Please describe how these processes interact with the location and dynamics of the Shotover Delta and the location of the ORC River Training Line.
6. Please provide an assessment of effects arising from the location of the proposed discharge point on fluvial geomorphic process, including its effects on:
 - a. Flow patterns, velocity and bed shear stress within the Kawarau River under representative flow conditions, including both low flows and a range of flood flows; and
 - b. Scour, erosion, sediment transport, and sediment deposition including potential effects upstream and downstream of the discharge point, and on the Shotover Delta and ORC River Training Line.
7. Please provide a quantitative assessment of the potential effects of the proposed discharge point on flood conveyance and the existing flood hazard, including upstream and downstream of the structure. Please identify the range of flow conditions assessed and demonstrate that the proposed structure will not materially reduce the flood-carrying capacity of the Kawarau River at this location and will not exacerbate the existing flood hazard.
8. Please provide details of the proposed monitoring framework to identify, quantify, and assess any effects of the discharge point on fluvial geomorphic processes. The monitoring should include, but may not be limited to, the form and character of the river and the

stability of the river bed and banks upstream and downstream of the discharge point. Please specify monitoring locations, parameters, frequency, duration, baseline information and proposed trigger levels/responses where applicable.

9. As set out in the independent review, it is considered that the potential for downstream erosion effects and interaction with existing fluvial geomorphological processes may be reduced if the proposed discharge point was further upstream of the Shotover Delta. Please provide justification for the proposed outfall location, whether any alternative outfall locations were considered and explain why the proposed discharge point location is preferred.
10. Proposed condition (4) of Consent #2 of Appendix O to the application refers to flood carrying capacity of the Kawarau River prior to 2011. Please clarify the basis for adopting the flood carrying capacity from prior to 2011 as an appropriate baseline.

If flexibility for both discharge point options is proposed to be retained in the application, please provide an assessment as described above for each of the discharge options (outfall and submerged pipe) proposed.

Recreation Values

The Kawarau River Water Conservation Order (WCO) expressly identifies 'recreational purposes' as an outstanding characteristic requiring protection. An independent review of the Recreation Assessment has been undertaken by Mr Wilson on behalf of the ORC. The review identifies the following matters requiring clarification. Please clarify:

11. Whether the conclusions reached in the Recreation Assessment are based on the conclusions reached in the technical assessments provided in Appendices A and B1 to the application.
12. The methodology adopted for determining the scale of impact on recreation values in Table 8 of the Recreation Assessment.
13. The value of motocross in the Recreation Assessment based on the statement made at paragraph (13)(c) of the Recreation Assessment Technical review.
14. The meaning of "national significance" as throughout the Recreation Assessment as identified in paragraph (13)(d).
15. Please also provide a separate assessment of the use and value of the environment for mountain biking, four wheel driving and motocross, as well as the effects of those activities.

This information is required to ensure that ORC correctly understands your assessment and the effect of the activity on recreation values.

Landscape Values

An independent review of the Landscape Values Assessment has been undertaken by Mr Parker on behalf of the ORC. The review identifies one matter requiring clarification. Please clarify:

16. Whether the conclusions reached in the Landscape Assessment are based on the conclusions reached in the technical assessments provided in Appendices A and B1 to the application.

This information is required to ensure that ORC correctly understands your assessment.

Objective and policy assessment

A comprehensive assessment of the objectives and policies relevant to the proposal is contained in Section 7 of the Application.

17. If any of the information provided in response to the matters identified in this letter mean that objective and policy assessments provided are no longer relevant, please provide updated assessments.

Your application will be placed on hold under section 88C of the Act until the requested information has been received. Unless I hear otherwise from you I will continue to do some minor work on your application so that we can progress it once the application comes 'off hold'.

In accordance with section 92A of the Act, please respond within 15 working days from the date of this letter (**20 August 2026**) with one of the following:

1. The information requested above; or
2. Written advice that you agree to provide the information, and the date by which you intend to provide it; or
3. Written advice that you refuse to provide the requested information.

Incomplete Application

Under Section 92AA the Council may determine your application is incomplete if after 3 months following the close of the 15 working day period, you have not responded to this request. If determined to be incomplete your application will be returned to you. If you relodge your application it will be treated as a new application.

If the information you provide raises more questions, your application will remain on hold until sufficient information has been provided to enable processing to continue.

If you have any further queries, please contact me on (03) 474 0827 or 0800 474 082.

Information on the current processing costs for your application is included in the email relating to this letter.

Yours sincerely



Hannah Goslin
Consultant Consents Planner