

Submission No:

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

Full Name/s Janet Dolan

Full Postal Address: [REDACTED]

[REDACTED] Post Code [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

I/ we wish to submit a **OPPOSE**  
on the application of:

(choose one) submission

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: *(Give details)*  
The request from QLDC to discharge untreated wastewater

*My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).*

My submission is that a robust wastewater system is essential for an expanding population. Should this application be accepted by the ORC there is no motivation for the QLDC to adopt such a system - rather to take the cheaper option and make do with a wastewater system which clearly needs to be repaired and improved upon to cope with the growth in the area. QLDC spending seems to be focused on town planning - no point having a lovely new lakefront when the lake would be continually contaminated!

**Submission No:**

*I/We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)*

That QLDC's application to discharge wastewater is refused.

**I/we:**

- ☐ Wish to be heard in support of our/my submission  
☒ Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☒ Yes  
☐ No

I, Am Not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, Do Not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have Not served a copy of my submission on the applicant.

[Redacted Signature]

12/7/19

**Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)**

**(Date)**

Submission No: \_\_\_\_\_

### Submission Form 13

File No: RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

#### Applicant Details:

Applicant: Queenstown Lakes District Council

Application No: RM19.051.01

Consent Type: Discharge Permit

Purpose: To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Map reference: Various locations throughout the Queenstown Lakes district

Legal description: Various locations throughout the Queenstown Lakes district

#### Submitter Details: (please print clearly)

Full Name/s Jason Wayne Morgan

Full Postal Address: [REDACTED]  
[REDACTED]  
[REDACTED] Post Code: [REDACTED]

☐ Work Ph:

☐ Home Ph:

☐ Mobile Ph:

☐ Email address:

(please tick your preferred Daytime contact number)

[REDACTED]  
Signature/s of submitter/s  
(or person authorised to sign on behalf of submitter/s)

11/07/19  
(Date)

Submission No: \_\_\_\_\_

Please tick one of the following submission types regarding the application,

Do you:

- ☐ Support
- ☐ Neutral
- ☒ Oppose

Do you:

- ☒ Wish to be heard
- ☐ Not wish to be heard

in support of my/our submission.

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☒ Yes
- ☐ No

The specific parts of the application/s that my submission relates to are: *(Give details)*

The disposal / dumping of wastewater into  
our waterways

My/Our submission is *(the reasons for your views, use a separate sheet if necessary)*

As a residential & business owner and  
ratepayer of the GLDC, we strongly oppose  
the council discharging waste water into our  
waterways. We cannot understand why the  
developers responsible for the intensification  
of our towns are not made to contribute more  
to the infrastructure.

Submission No: \_\_\_\_\_

I/We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)

We strongly oppose the dumping of wastewater into our waterways & therefore implore the GLDC take stronger action to ensure that the developers pay a greater levy to upgrade our infrastructure to guarantee this deplorable action does not happen!!

Date submissions close: 5 pm Friday 12<sup>th</sup> July 2019

A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Otago Regional Council

Address for Otago Regional Council:

Otago Regional Council, Private Bag 1954, Dunedin, 9054  
or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

Address for Applicant:

Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300  
Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

## Karen Bagnall

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**From:** jennie.blesssherheart [REDACTED]  
**Sent:** Friday, 12 July 2019 3:11 p.m.  
**To:** Karen Bagnall  
**Cc:** Submissions; alisha.robinson@beca.com  
**Subject:** RE: Submission in relation to application no. RM19.051 Additional information for Jennie Blennerhassett

Sent from Samsung tablet.

----- Original message -----

**From:** Karen Bagnall <karen.bagnall@orc.govt.nz>  
**Date:** 12/07/19 11:34 AM (GMT+12:00)  
**To:** "jennie.blesssherheart" [REDACTED]  
**Subject:** RE: Submission in relation to application no. RM19.051

Good morning – thank you for your submission – unfortunately there were a few things omitted – can you confirm the following;

I, am not a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, am/am not (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a. adversely affects the environment; and
- b. does not relate to trade competition or the effects of trade competition.

I, do not wish to be involved in any pre-hearing meeting that may be held for this application.

I do not request that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**I have served a copy of my submission on the applicant.**

**Could please reply to the submission e-mail address as per your original submission.**

**Please note that submissions close at 5 pm on Friday 12 July 2019**

**Please do not hesitate to contact me should you have any questions.**



## **Karen Bagnall**

**SENIOR CONSENTS SUPPORT OFFICER**

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Otago Regional Council

70 Stafford St  
Private Bag 1954 Dunedin 9054

P (03) 474 0827 or 0800 474 082

[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)  
[www.orc.govt.nz](http://www.orc.govt.nz)

### **Important Notice**

This email contains information which is confidential and may be subject to legal privilege. If you are not the intended recipient, you must not peruse, use, disseminate, distribute or copy this email or attachments. If you have received this in error, please notify us immediately by return email, facsimile (03 479-0015) or telephone (03 474-0827) and delete this email. The Otago Regional Council accepts no responsibility for changes made to this email or to any attachments following the original transmission from its offices. Thank you

**From:** jennie.blesscherheart <[REDACTED]>  
**Sent:** Thursday, 11 July 2019 7:42 p.m.  
**To:** Submissions <Submissions@orc.govt.nz>  
**Cc:** alisha.robinson@beca.com  
**Subject:** Submission in relation to application no. RM19.051

The following is my submission in relation to application no. RM19.051 - full details are below.

This application is being emailed to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz) and copied to the applicant at [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com). Please contact me by return email if there is anything further you need from me in order for the application to be valid.

#### 1. My details

Name: Me. Jennie Blennerhassett

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

#### 2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district. The proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

#### 3. Whether it is in support or opposition.

I am making this submission to register my complete opposition to the application in the strongest possible terms.

#### 4. Submissions and reasons

Our waterways, rivers and lakes are already under threat from multiple sources, and we should not be allowing discharge of untreated wastewater into these systems under any circumstances. Such discharge threatens to cause both short and long term damage which can and should be avoided.

It should be part of QLDC's responsibility to assess potential points of weakness, failure or blockage, and to put sufficient safeguards in place to ensure that discharge of untreated wastewater is not required. Potential solutions could include holding tanks, secondary overflow systems, holding ponds, water treatment systems and more. These systems should all be monitored and maintained to a high standard.

The Queenstown Lakes District area is an area of outstanding natural beauty which has become sought after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLD has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted. The QLDC should be held to the highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which could threaten the very

reason tourists flock to Central Otago. It simply makes no sense to allow QLDC to pollute our natural resources - resources which are the reason tourists want to come to Central Otago.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? In my view, this is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

**5. Decision I wish Council to make.**

I ask that the ORC declines QLDC's application for consent, in its entirety, and (if within its powers) directs the applicant to come back with a more sustainable, environmentally friendly plan to deal with waste water.

**6. Wish to be heard.**

I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

Sincerely,

Nga mihi nui

**Jennie Blennerhassett**

Sent from Samsung tablet.

Submission No:

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

**Full Name/s** Jennifer Ruth Cleland and Arne Cleland

**Full Postal Address:** [REDACTED]

**Post Code:** [REDACTED]

**Please provide your preferred contact phone number:** [REDACTED]

**Email address:** [REDACTED]

I/ we wish to submit a **OPPOSE**  
on the application of:

(choose one) submission

**Applicant's Name:** **Queenstown Lakes District Council**

**Application Number:** **RM19.051.01**

**Location:** **Various locations throughout the Queenstown Lakes district**

**Purpose:** **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: *(Give details)*

The 35 year term of the consent

Discharging untreated wastewater into lakes and waterways

My/Our submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).*

We oppose the 35 year term of the proposed consent as the length of the term does not provide any incentive to fix or mitigate the problems within the infrastructure as soon as is practically and financially possible. Technology for infrastructure best practice may not be present in the older infrastructure now or new solutions may be available within 10 years therefor there needs to be a strong incentive for the QLDC to spend the required money to improve the infrastructure. Having a consent to spill waste water into the lake is an easy 'out' for the council. At present the QLDC can be fined by the ORC for spilling waste water into water ways so a consent would weaken the protection for water quality.

**Submission No:**

I/We seek the following decision from the consent authority *(give precise details, including the general nature of any conditions sought)*

If the consent is granted we would strongly ask for the following conditions -

The length of the consent is reduced to 10 years

Full transparency regarding waste water entering waterways - public notification through council website and local media

Funding for research required on the effects of waste water entering waterways in terms of the health of the waterway and the people who recreate in it

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☐ Yes  
☒ No

I, Am Not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*



I, (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, Do Not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have served a copy of my submission on the applicant.

  
  
\_\_\_\_\_  
**Signature/s of submitter/s** *(or person authorised to sign on behalf of submitter/s)*

11-Jul-19

\_\_\_\_\_  
(Date)

Submission No:

### Submission Form 13 to the Otago Regional Council on Consent Application RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

Full Name/s Jenny Sutherland

Full Postal Address: [REDACTED]  
[REDACTED] Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

I/ we wish to submit a  (choose one) submission on the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: *(Give details)*

To discharge untreated wastewater to various freshwater receiving environments

My/Our submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views)*.

Under no circumstances in our 100% pure clean NZ portrait image is this acceptable. The QLDC needs to look for alternative options. This is not only a problem specific to QLD so research is required nationally and if need be to overseas councils, local governments for their best practise. I oppose this submission.

**Submission No:**

I/We seek the following decision from the consent authority (*give precise details, including the general nature of any conditions sought*)

The QLDC needs to look for alternative options. This is not only a problem specific to QLD so research is required nationally and if need be to overseas councils, local governments for their best practise.

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☒ Yes  
☐ No

I, Am Not ☐ (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, Am ☐ (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

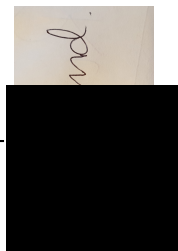
I, Do Not ☐ (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do Not ☐ request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have ☐ served a copy of my submission on the applicant.



**Signature/s of submitter/s**  
*to sign on behalf of submitte*



*horised*

11.07.19

(Date)

## Submission No:

### ***Notes to the submitter***

If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.

If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The address for service for the Consent Authority is:

**Otago Regional Council, Private Bag 1954, Dunedin, 9054**  
or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

**Submission No:**

## Submission Form 13 to the Otago Regional Council on Consent Application RM19.051

**This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.**

### Submitter Details:

**Full Name/s** Joanna Ashe

**Full Postal Address:**Post Code: 

**Please provide your preferred contact phone number:**

**Email address:**

I/ we wish to submit a **OPPOSE**  
on the application of:

(choose one) submission

**Applicant's Name:** Queenstown Lakes District Council

**Application Number: RM19.051.01**

**Location:** Various locations throughout the Queenstown Lakes district

**Purpose:** To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

**The specific parts of the application that my submission relates to are: (Give details)**

**All parts relating to the discharge of waste water overflows from the QLDC sewage network to freshwater receiving environments.**

**My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).**

that the consent not be allowed in its entirety due the fact it does not meet the requirements under the National Policy Statement for Freshwater Management specifically in regard to:

Safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species.

Safe guarding the health of people who come into contact with the water.

National Policy Statement for Freshwater Management A. Water quality Objective A1 To safeguard: a) the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, of fresh water; and b) the health of people and communities, as affected by contact with fresh water; In sustainably managing the use and development of land, and of discharges of contaminants.

**Maintaining or improving the overall quality of fresh water within a freshwater management unit.**

**National Policy Statement for Freshwater Management Objective A2** The overall quality of fresh water within a freshwater management unit is maintained or improved while: a) protecting the significant values of outstanding freshwater bodies; b) protecting the significant values of wetlands; and c) improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated.

Improving water quality so that it is suitable for primary contact more often.

National Policy Statement for Freshwater Management Objective A3 The quality of fresh water within a freshwater management unit is improved so it is suitable for primary contact more often, unless: a) regional targets established under Policy A6(b) have been achieved; or b) naturally occurring processes mean further improvement is not possible.

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**Submission No:**

**I/We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)**

that the consent not be allowed in its entirety as the consent does not meet the requirements of the National Policy Statement for Freshwater management. National Policy Statement for Freshwater management Policy A4 and direction (under section 55) to regional councils By every regional council amending regional plans (without using the process in Schedule 1) to the extent needed to ensure the plans include the following policy to apply until any changes under Schedule 1 to give effect to Policy A1 and Policy A2 (freshwater quality limits and targets) have become operative: 1. "When considering any application for a discharge the consent authority must have regard to the following matters: a. the extent to which the discharge would avoid contamination that will have an adverse effect on the life-supporting capacity of fresh water including on any ecosystem associated with fresh water and b. the extent to which it is feasible and dependable that any more than minor adverse effect on fresh water, and on any ecosystem associated with fresh water, resulting from the discharge would be avoided. 2. When considering any application for a discharge the consent authority must have regard to the following matters: a. the extent to which the discharge would avoid contamination that will have an adverse effect on the health of people and communities as affected by their contact with fresh water; and b. the extent to which it is feasible and dependable that any more than minor adverse effect on the health of people and communities as affected by their contact with fresh water resulting from the discharge would be avoided

**I/we:**

- ☐ Wish to be heard in support of our/my submission  
☒ Do not wish to be heard in support of our/my submission

**If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.**

- ☐ Yes  
☒ No

**I, Am Not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).**

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

**I, Am (choose one) directly affected by an effect as a result of the proposed activity in the application that:**

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

**I, Do Not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.**

**I Do request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.**

**i Have served a copy of my submission on the applicant.**



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Digitally signed by zune-tuner//windowsphone/  
ecb47e2f20-%20-%20c3ce2cb4%  
20-%20fc887804%20-%2000675b84  
DN: cn=zune-tuner//windowsphone/  
ecb47e2f20-%20-%20c3ce2cb4%20-%  
20-%20fc887804%20-%2000675b84  
Date: 2019.07.19 18:58:57 +12'00'

10-Jul-19

**Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)**

**(Date)**

## **Submission No:**

### ***Notes to the submitter***

If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.

If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The address for service for the Consent Authority is:

**Otago Regional Council, Private Bag 1954, Dunedin, 9054**  
or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

Submission No: RM19.051

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

(please print clearly)

Full Name/s Joanna Margaret Finnigan

Full Postal Address: [REDACTED]

[REDACTED] Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

I/ we wish to submit a **SUPPORT** / **OPPOSE** / **NEUTRAL** (circle one) submission on the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: (Give details)

The proposed discharge of untreated waste water to our freshwater environment.

The proposed circumstances where untreated waste water may be discharged into fresh water - most specifically network overflows, system failures.

My Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).

I oppose the application.

Submission No: \_\_\_\_\_

I/We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)

consent not be granted

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☐ Yes  
☒ No

I, am/am not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, am/am not (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, do/do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I do/do not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I have/have not served a copy of my submission on the applicant.

[Signature]  
Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)

11/7/2019  
(Date)

**Submission No:** \_\_\_\_\_

***Notes to the submitter***

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

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You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The address for service for the Consent Authority is:

**Otago Regional Council, Private Bag 1954, Dunedin, 9054**  
or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**  
Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

**Submission close at 5 pm on Friday 12 July 2019**

**From:** [REDACTED]  
**To:** [Karen Bagnall](#)  
**Cc:** [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)  
**Subject:** Re: Queenstown Lakes District Council - RM19.051  
**Date:** Wednesday, 10 July 2019 10:46:24 a.m.

---

Hi Karen, thank you for your email.

If you can add the following information to my submission that would be great.

1. I am not a trade competitor of the applicant.
2. I am happy to present a joint case with others making a similar submission.
3. I wish to be involved in any pre- hearing meeting that may be held for this application in so far as it relates to the scope of my submission.
4. I request that one or more hearings commissioners who are not members of the local authority are appointed to hear and decide the application.

Regards,

John Glover

Sent from my iPad

On 10/07/2019, at 10:35, Karen Bagnall <[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)> wrote:

Good morning Mr Glover – thank you for your e-mail unfortunately it cannot be considered as a formal submission unless it contains information as per the attached form. You can either e-mail the missing information to be added to your original e-mail or you can complete the form attached and return it to the submissions e-mail address.

Please do not hesitate to contact me should you have any questions

Regards

<[image001.png](#)>

**Karen Bagnall**

SENIOR CONSENTS SUPPORT OFFICER

---

Otago Regional Council  
70 Stafford St  
Private Bag 1954 Dunedin 9054  
P (03) 474 0827 or 0800 474 082

[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)  
[www.orc.govt.nz](http://www.orc.govt.nz)

**Important Notice**

This email contains information which is confidential and may be subject to legal privilege. If you are not the intended recipient, you must not peruse, use, disseminate, distribute or copy this email or attachments. If you have received this in error, please notify us immediately by return email, facsimile (03 479-0015) or telephone (03 474-0827) and delete this email. The Otago Regional Council accepts no responsibility for changes made to this email or to any attachments following the original transmission from its offices. Thank you

---

**From:** John glover <[REDACTED]>

**Sent:** Tuesday, 9 July 2019 2:54 p.m.

**Cc:** Alisha Robinson <[Alisha.Robinson@beca.com](mailto:Alisha.Robinson@beca.com)>; [REDACTED]

**Subject:** Queenstown Lakes District Council - RM19.051

To: the Otago Regional Council

Queenstown Lakes District Council - RM19.051

Submission of John Glover

[REDACTED]  
[REDACTED]  
[REDACTED]

I am writing in opposition to the consent application.

I oppose condition 2(b) of the as far as it relates to as yet unbuilt or unconsented wastewater schemes.

My reasons for opposing Condition 2(b) are as follows:-

QLDCs' basis for the consent is that it is foreseeable that there will be unintended discharges arising from circumstances beyond its control. The mechanisms discussed are debris, fat build ups, tree roots, blockages etc leading to overflow from manholes in pipelines installed near water bodies.

The Glenorchy township currently utilises onsite wastewater treatment and disposal. The likelihood of there being overflows of wastewater which might enter a waterbody or watercourse in this situation are negligible (major disaster scenario notwithstanding).

The information within the consent documents imply the Queenstown Lakes District Council proposes to utilise a gravity sewer to collect wastewater then pump it, via large pipes, over a couple of watercourses en route to a disposal field.(Fig 15 Appendix E and Figs 51 and 69 Appendix G)

This has the effect of significantly increasing the likelihood of wastewater discharge into water because:-

- a) the wastewater is gathered up and transported so if anything fails, the amount of wastewater likely to be released is far far greater than with the current on site treatment regime;
- b) the wastewater scheme is not designed to avoid the known causes of failure - debris, tree roots, non flush wipes and fat build up;
- c) the scheme envisages - as per the information in the annexes - wastewater passing over and pump stations near to watercourses.

I consider that treatment technologies exist that do not present the above risks. Examples would be either utilisation of advanced secondary onsite wastewater

treatment or a Septic Tank Effluent Pump (STEP) reticulated community system. These are also far more resilient against the effects of creep or earth movement, infiltration and inundation than a traditional gravity sewer.

I therefore submit that Condition 2(b) be amended by the removal of any reference to as yet unbuilt and unconsented schemes.

I also submit that a new Condition be added that requires QLDC to ensure, as far as is reasonable, that any new schemes it commissions are designed using technologies that avoid debris entering the network, avoid the impact of tree root growth and minimise the likelihood of fats, nappies, wipes and other objects entering the reticulated network.

I wish to speak to my submission.

Signed

John Glover

9 July 2019

Cc [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

Sent from my iPad

<Submission Form for publicly Notified Application RM19.051 -Editable Version.pdf>

Submission No:

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

Full Name/s Joseph Wadsworth

Full Postal Address: [REDACTED]

Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

I/~~we~~ wish to submit a opposition (choose one) submission on the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: (Give details)

I am making this submission to register my opposition to the application in the strongest possible terms.

My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).

Our waterways are already under significant threat from multiple sources, including rivers and lakes. We should not allow discharge of untreated wastewater into these systems under any circumstance. Such discharge threatens both short and long term damage to the ecosystems, and economy

**Submission No:**

I/We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)

I ask the ORC decline the QLDC application in its entirety and direct the applicant to design a sustainable, future proof, and expandable solution to protect our environment and process the waste water correctly and responsibly

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☐ Yes  
☒ No

I, Am Not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

\*If trade competitor chosen, please complete the next statement, otherwise leave blank.

I, Am (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, Do Not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do Not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have served a copy of my submission on the applicant.



Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)

11/7/19  
(Date)

## Submission No:

### **Notes to the submitter**

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

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You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

Submission No: \_\_\_\_\_

**Submission Form 13 to the Otago Regional Council on consent application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**  
(please print clearly)

Full Name/s JUDITH MARY STEVENSON

Full Postal Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Post Code: \_\_\_\_\_

Please provide your preferred contact phone number: \_\_\_\_\_

Email address: \_\_\_\_\_

I/we wish to submit a **SUPPORT** / **OPPOSE** / **NEUTRAL** submission on (circle one) the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application/s that my submission relates to are: (Give details)

ALL OF THE APPLICATION  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

My/Our submission is (include: whether you support or strongly oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).

Because, too long a time, it will involve another generation. It involves tourist towns - 100% Pure NZ!!! The total coverage is huge. No quantity or quality mentioned. They have had plenty of time to rectify / fix overflow situations. The capacity exceedance must be monitored better eg less down allowed. The Ecosystem, Kai moana & recreation will suffer.

Submission No: \_\_\_\_\_

I/We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)

That consent to discharge untreated wastewater including sewage is only permitted if The Alpine Fault becomes very active, causes displacement & the network of pipes rupture and or break leaking into the surrounding water and land.

I/we:

- ☒ Wish to be heard in support of our/my submission  
☐ Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☒ Yes  
☐ No

I, am/am not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, am/am not (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, do/do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I do/do not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I have/have not served a copy of my submission on the applicant.

\_\_\_\_\_  
Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)

\_\_\_\_\_  
(Date)

12.7.2019

For J M STEVENSON FAMILY TRUST  
Judith Mary Stevenson & Bco Trustees (2011) Ltd

**Submission No:** \_\_\_\_\_

***Notes to the submitter***

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Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

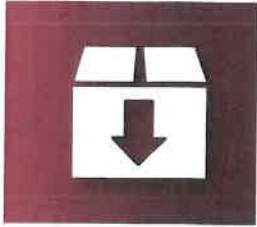
- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
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The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**  
Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)



# FORM 13: SUBMISSION

## ON A RESOURCE CONSENT APPLICATION



Resource Management Act 1991 Section 96



**TO** // Queenstown Lakes District Council



**YOUR DETAILS** // Our preferred methods of corresponding with you are by **email** and **phone**.

Name: Judith Pringle

Phone Numbers: Work:

Home:

Mobile: 021 548044

Email Address:

Postal Address:

Post code:



### APPLICANT DETAILS

Applicant's Name: Queenstown Lakes District Council (QLDC)

Application Reference Number:

Details of Application:

Right to continue for 35 years! discharging waste water, including raw sewage into Lake Wakitipu

Location of Application:  
Queenstown



### SUBMISSION

☐ Support

/



Oppose

the application

☐ Do

/



Do not

wish to be heard in support of my submission



### SIGNATURE

Signature (to be signed for or on behalf of submitter) \*\*

Date 12 July 2019

\*\* If this form is being completed on-line you may not be able, or required, to sign this form.

100

100

100



**MY SUBMISSION IS** // The particular parts of the application I support or object to are:



**THE REASONS FOR MY SUBMISSION ARE:**

A key reason for me shifting here and many other citizens living here is the natural beauty and the pristine environment. This is also a major attractor for the basis of our economy, namely, tourism. The relationship between human activity and pollution of the land, air and water must be recognised by the Council. We live in an ecological web: degradation of one has implications for the others. The Council has shown by its activities (not always with a considered eye to the future) that it is concerned with the economic implications for the community. Our economy depends on a clean and pristine environment including the waters. We have a responsibility to care of it all for the present and for the future.



**MY SUBMISSION WOULD BE MET BY THE QUEENSTOWN LAKES DISTRICT COUNCIL MAKING THE FOLLOWING DECISION** // Include any conditions sought:

Cessation immediately of the right to discharge waste water, including raw sewage and in the future.



Submission No: \_\_\_\_\_

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

**This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.**

**Submitter Details:**

*(please print clearly)*

**Full Name/s** **Judy Thompson (on behalf of Luggate Community Association)**

**Full Postal Address:**

18 Jackson Rise  
Luggate,  
RD 3 CROMWELL

**Post Code:**9382

**Please provide your preferred contact phone number:** ( )

**Email address:**

I/ we wish to submit a / **OPPOSE** / (circle one) submission on the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: *(Give details)*

1. The discharge of untreated waste water into our waterways is abhorrent and culturally unacceptable.
2. The length of the consent applied for, 35 years is to long and does not promote or encourage a commitment to risk management.

My/Our submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views)*

We oppose the application and the ORC should not approve it as it stands.

We represent the Luggate Community and I also live near Luggate Creek. The Creek runs through the township and is widely used for recreational activities such as fishing and swimming by local families and visitors.

**Submission No:** \_\_\_\_\_

We have a choice, and we urge the ORC to fulfil its responsibility to protect our environment from adverse events and in this instance our local lakes and rivers.

I/We seek the following decision from the consent authority (*give precise details, including the general nature of any conditions sought*)

That the consent be for a period of 5 years only.

That the applicant be required to report annually on the evidence of their risk reduction.

That monitoring requirements of the downstream changes in the waterways that are subject to the accidental release of waste water are specified.

That the consent include a clause ‘that where remedial action, following a spill is identified as beneficial, the ORC can require it to be carried out at the submitters cost’ This opportunity must be taken to prevent contamination by including incentives that are financial. It is costlier to clean up and improve contaminated sites than it is to prevent the contamination.

The consent include a clause that “if after independent investigation, when negligence has occurred, the ORC retains the ability to prosecute” this incentivises the applicant to mitigate risk in a timely manner.

A major concern is that the new pump station located at Luggate and which is identified as high risk, has been allowed to be built without even holding tanks required as a first line of prevention! This demonstrates the applicants lack of commitment to prevention. That installation of tank storage, with suitable capacity, is required as a priority at the Luggate site and other high risk sites, as a first step in mitigating the risk of contamination.

That there is a requirement to notify the community of risks and spillages of waste water in their area.

That the applicant be required to report and investigate each event.

That the number and seriousness of reported events be identified (whether on to land or water) when a clause in the consent is ‘time frame’ escalated to action preventive measures.

That monitoring of micro organisms be commenced early to ensure any patterns of change are detected early and responded to promptly. This must include downstream sites such as Lake Dunstan .

I/we:

☐ Wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

☐ No

I, **am not** (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

**Submission No:**\_\_\_\_\_

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, **am** (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

I, **do** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have** served a copy of my submission on the applicant.

J M Thompson

\_\_\_\_\_  
**Signature/s of submitter/s** (or person authorised  
to sign on behalf of submitter/s)

12/07/2019  
(Date)

**Submission No:** \_\_\_\_\_

***Notes to the submitter***

If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

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You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.

If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

**Submission close at 5 pm on Friday 12 July 2019**

Submission No: \_\_\_\_\_

**Submission Form 13 to the Otago Regional Council on consent application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

Submitter Details:  
(please print clearly)

Full Name/s KAREN GALLAGHER

Full Postal Address: [REDACTED]

[REDACTED] Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

I/ we wish to submit a **SUPPORT** / **OPPOSE** / **NEUTRAL** submission on (circle one) the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application/s that my submission relates to are: (Give details)

Discharging of untreated waste water to  
freshwater environments  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).

I oppose the application because of the  
irreversible, negative impact on our lakes, rivers and  
especially downstream to Lake Dunstan.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Submission No: \_\_\_\_\_

I/We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)

To oppose this submission to dump  
untreated waste water into various freshwater  
receiving environments

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☐ Yes  
☒ No

I, **am/am not** (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, **am/am not** (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, **do/do not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do/do not** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I ~~have~~/have not served a copy of my submission on the applicant.

  
\_\_\_\_\_  
Signatures of submitter/s (or person authorised to sign on behalf of submitter/s)

12/7/19.  
(Date)

The following is my submission in relation to application no. RM19.051 - full details are below.

This application is being emailed to [[submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)] and copied to the applicant at [[alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)].

Please contact me by return email if there is anything further you need from me in order for the application to be valid.

#### 1. My details

Name: Karen L Eadie

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

#### 2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in circumstances where it may enter water as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district. The proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

#### 3. Whether it is in support or opposition.

I am making this submission to register my opposition to the application in the strongest possible terms.

#### 4. Submissions and reasons

Our waterways, rivers and lakes are already under threat from multiple sources, and we should not be allowing discharge of untreated wastewater into these systems under any circumstances. Such discharge threatens to cause both short and long term damage which can and should be avoided.

It should be part of QLDC's responsibility as the region's infrastructure grows to cater for future planned expansion to assess potential points of weakness, failure or blockage, and to put sufficient safeguards in place to ensure that discharge of untreated wastewater is not required. Potential solutions could include holding tanks, secondary overflow systems, holding ponds, water treatment systems and more. These systems should all be monitored and maintained to a high standard.

The Queenstown Lakes District area is an area of outstanding natural beauty which has become sort after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLDC has a duty with forward planning and infrastructure provisions as the region grows, to ensure that these natural resources are preserved and maintained, not endangered and polluted. The QLDC should be held to the highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which could threaten the very reason tourists are drawn to Central Otago. It simply makes no sense to allow QLDC to pollute our natural resources –

These very resources which are the reason tourists want to come to Central Otago.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? In my view, this is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

5. Decision I wish Council to make.

I ask that the ORC declines QLDC's application for consent, in its entirety, and (if within its powers) directs the applicant to come back with a more sustainable, environmentally friendly plan to deal with waste water.

6. I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

Kind regards,

Karen L Eadie

**Karen Bagnall**

---

**From:** Chris & Lee [REDACTED]  
**Sent:** Friday, 12 July 2019 2:26 p.m.  
**To:** Submissions  
**Cc:** alisha.robinson@beca.com; 'Chris & Lee'  
**Subject:** FW: Submission to ORC in relation to application no. RM19.051  
**Attachments:** Submission to ORC re QLDC Wastewater to waterways application no. RM19.051 dated 12.7.19.docx

Hi ORC,

Further to my Submission see attached please see answers to questions required below:

I, **am not** a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

NOT APPLICABLE see Above- I, **am/am not-** directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

I, **do not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do not request\*** that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have served** a copy of my submission on the applicant.

Kind regards,

Karen Lee Eadie  
[REDACTED]

---

**From:** Karen Bagnall <karen.bagnall@orc.govt.nz>  
**Sent:** Friday, 12 July 2019 2:13 PM  
**To:** Chris & Lee [REDACTED]  
**Subject:** RE: Submission to ORC in relation to application no. RM19.051

Good afternoon – thank you for your submission – unfortunately there were a few things omitted – can you confirm the following;

I, **am/am not** (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, **am/am not** (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

I, **do/do not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do/do not** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have/have not** served a copy of my submission on the applicant.

Could please reply to the submission e-mail address as per your original submission.

Please do not hesitate to contact me should you have any questions.



**Karen Bagnall**

SENIOR CONSENTS SUPPORT OFFICER

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Otago Regional Council  
70 Stafford St  
Private Bag 1954 Dunedin 9054  
P (03) 474 0827 or 0800 474 082

[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)  
[www.orc.govt.nz](http://www.orc.govt.nz)

**Important Notice**

This email contains information which is confidential and may be subject to legal privilege. If you are not the intended recipient, you must not peruse, use, disseminate, distribute or copy this email or attachments. If you have received this in error, please notify us immediately by return email, facsimile (03 479-0015) or telephone (03 474-0827) and delete this email. The Otago Regional Council accepts no responsibility for changes made to this email or to any attachments following the original transmission from its offices. Thank you

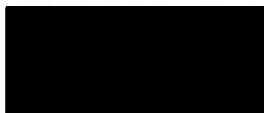
**From:** Chris & Lee [REDACTED]  
**Sent:** Friday, 12 July 2019 11:46 a.m.  
**To:** Submissions <[Submissions@orc.govt.nz](mailto:Submissions@orc.govt.nz)>  
**Cc:** [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com); 'Chris & Lee' [REDACTED]  
**Subject:** Submission to ORC in relation to application no. RM19.051

Dear ORC,

Please find attached my Submission to ORC in relation to application no. RM19.051 by the QLDC,

Kind regards,

K. L. Eadie





---

11 July 2019

Otago Regional Council

P O Box 1954

**DUNEDIN 9054**

*Tēnā Koutou, ko tenei mihi atu ki a koutou, ngā mema o te komiti, ngā kaiwhakawa o ngā mea e pa ana tenei kaupapa taumaha, me ki, o tātou nei rohe moana, he taaka o tatou nei whanau, hapu me te iwi. Ki a ratou kua whetu rangitia, te hunga wairua, haere, moe mai, oki oki mai, kati.*

**RE: Resource Consent Application - Queenstown Lakes District Council**

**Resource Consent Application - RM19.051**

**To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes District.**

This is a submission on a publicly notified resource consent application pursuant to Section 95A of the Resource Management Act 1991.

Kāti Huirapa Rūnaka ki Puketeraki and Te Rūnanga o Ōtākou (Kāi Tahu) **oppose** this application.

We **do wish** to be heard in support of this submission at a hearing.

## 1. INTRODUCTION

- 1.1 The takiwā of Kāti Huirapa Rūnaka ki Puketeraki centres on Karitane and extends from the Waihemo River/Shag River to Purehurehu/north of Heywards Point. Kāti Huirapa Rūnaka ki Puketeraki share an area of interest in the inland roto and mauka with Kāi Tahu Papatipu Rūnanga within Otago, and with those Papatipu Rūnanga located beyond the boundaries of the Otago region.
- 1.2 The takiwā of Te Rūnanga o Ōtākou centres on Muaūpoko/Otago Peninsula and extends from Purehurehu Point/north of Heyward Point to the Clutha River/Mata-au River. Te Rūnanga o Ōtākou share an area of interest in the inland roto and mauka with Kāi Tahu Papatipu Rūnanga within Otago, and with those Papatipu Rūnanga located beyond the boundaries of the Otago region.
- 1.3 To acknowledge the association with the district and its resources, Māori words (underlined) are used within this document. See Appendix 1 for translation.

## 2. KAITIAKITAKA

- 2.1 The Kāi Tahu ki Otago Natural Resource Management Plans 1995 and 2005 are the principal resource management planning documents for Kāi Tahu ki Otago. The kaupapa of the plans is 'Ki Uta ki Tai' (Mountains to the Sea), which reflects the holistic Kāi Tahu ki Otago philosophy of resource management.
- 2.2 The plans express Kāi Tahu ki Otago values, knowledge and perspectives on natural resource and environmental management issues. The plans are an expression of kaitiakitaka. While the plans are first and foremost planning documents to assist Kāi Tahu ki Otago in carrying out their kaitiaki roles and responsibilities, they are also intended to assist others in understanding takata whenua values and policy.
- 2.3 The 2005 Natural Resource Management Plan is divided into catchments, with specific provisions for the whole Otago area and each catchment. The current proposal is located within the Clutha/Mata-au Catchment.
- 2.4 The relevant objectives and policies of the 2005 Natural Resource Management Plan are attached to this submission as Appendix 2.

## 3. SCOPE OF THE SUBMISSION

- 3.1 This submission relates to the application in its entirety.

#### 4. REASONS FOR THE DECISION SOUGHT

- 4.1 Kāi Tahu has a cultural, spiritual, historic and traditional relationship with the Clutha/Mata-au Catchment.
- 4.2 The Clutha/Mata-au Catchment and its headwaters were the traditional focus of seasonal migrations for many of the hapū and whānau living in the Araiteuru/Coastal Otago and Murihiku/Southland areas. Its vast length, many tributaries and three large roto at its headwaters, fed by the mauka in Kā Tiritiri o Te Moana/Southern Alps, had much to offer Kāi Tahu. The Clutha/Mata-au Catchments was therefore highly valued by all the different hapū and their whānau who used it. The use of these Catchments was a focus of our very distinctive seasonal lifestyle.
- 4.3 The Clutha/Mata-au River takes its name from a Kāi Tahu whānau whakapapa that traces the genealogy of water. On that basis, the Clutha/Mata-au River is seen as a descendant of the creation traditions.
- 4.4 The three roto at the headwaters of the Clutha/Mata-au River are an important source of freshwater. They are all fed by hukawai, these are waters with the highest level of purity and were accorded traditional classifications by Kāi Tahu ki Otago that recognised this value. Thus they are puna that sustains many ecosystems important to Kāi Tahu ki Otago.
- 4.5 The Clutha/Mata-au River was part of ara tawhito, mahika kai trail that led inland. Mahika kai sourced from the Clutha/Mata-au Catchment includes indigenous ika and manu such as:- tuna, kanakana, kōkōpu, moa, inaka, weka.
- 4.6 The Clutha/Mata-au River gave access to wide inland ngahere clad plains and to the roto and mauka beyond.
- 4.7 The Cultural Values Statement prepared by Aukaha outlines the significance of major roto and awa within the Queenstown Lakes District this includes spiritual and creation traditions along with the use and occupation associated with the takiwā and the waterways.
- 4.8 The roto and awa covered in the Cultural Values Statement do not fully address the significance to Kā Rūnaka of the waterways in the Queenstown Lakes District takiwā. Under the holistic resource management philosophy of 'Ki Uta Ki Tai' (Mountains to the Sea), it is considered that all tributaries to these roto and awa are of equal importance to Kā Rūnaka. This is shown through the use of these areas as ara tawhito, mahika kai and the traditional place names held

that reflect the unique history of the takiwā.

- 4.9 The Crown has acknowledged the Kāi Tahu relationship with specified areas and waterways as Statutory Acknowledgement areas. Of the 70 Statutory Acknowledgement areas there are 4 within the Queenstown Lakes District.

## 5. DECISION SOUGHT

- 5.1 Kāi Tahu submits that the application should **be declined**.
- 5.2 If consent is granted, it should include the proposed conditions as stated in the application and also be subject to the following conditions:-
- That the term of consent be no longer than 10 years.
  - That Kā Rūnaka via Aukaha are notified of any 'unplanned' wastewater discharges where it enters a waterway.
  - That all pump stations are alarmed, and the alarms should be installed within the next 2 years.
  - That the wastewater treatment systems not owned and managed by the Queenstown Lakes District Council to be incorporated in this application should adhere to the conditions of this consent once included in the Queenstown Lakes District Council wastewater treatment system network.
  - That there be a timeframe established and adhered to regarding decreasing the frequency of 'unplanned' wastewater discharges from within the Queenstown Lakes District wastewater treatment systems. It is recommended that the number of 'unplanned' discharges is reduced by 50% within the next 5 years.
  - That there be a timeframe established and adhered to regarding the upgrade of the Queenstown Lakes District wastewater treatment systems infrastructure. To achieve the above 50% reduction of 'unplanned' discharges, funding needs to be allocated in the Annual Plan and the Long Term Plan to enable this reduction. Kā Rūnaka via Aukaha should be informed annually of the funding and resulting reduction of 'unplanned' discharges.

- That water quality sampling at each 'unplanned' wastewater discharge site where it has entered water be undertaken within 2 hours of receiving notification of the discharge along with regular water quality sampling until no exceedance of allowable limits are shown, of:-
  - E.Coli
  - Suspended Solids
  - Biological Oxygen Demand (BOD)
  - Zinc
  - Copper
  - Lead
  - Dissolved Reactive Phosphorus
  - Ammonia
  - Faecal Coliforms
  
- That the Queenstown Lakes District Council shall provide ongoing education and awareness to the community on how the wastewater system should be used. This could be in the form of a notice, at eating establishments, hotels, industrial premises and local construction industry.

**E noho ora mai**

**Address for Service:**

*Tania Richardson*  
*Consents Officer*  
*Aukaha*  
*PO Box 446*  
***Dunedin 9054***

*Phone: (03) 477 0071*

*E-mail: [tania@aukaha.co.nz](mailto:tania@aukaha.co.nz)*

## **Appendix: 1**

### **Glossary**

<b>Ara tawhito</b>	Ancient Trails
<b>Awa</b>	River
<b>Hapū</b>	Sub-tribe
<b>Hukawai</b>	Snow
<b>Ika</b>	Fish
<b>Inaka</b>	Whitebait
<b>Kaitiaki/Kaitiakitaka</b>	Guardian / to exercise guardianship
<b>Kanakana</b>	Lamprey
<b>Kā Rūnaka</b>	Local representative group of Otago
<b>Kaupapa</b>	Customs or Protocols
<b>Kōkopu</b>	Giant Kōkopu
<b>Mahika kai</b>	Places where food is produced or procured.
<b>Manu</b>	Bird
<b>Mauka</b>	Mountain
<b>Ngahere</b>	Forest
<b>Papatipu Rūnanga</b>	Traditional Kāi Tahu Rūnanga
<b>Puna</b>	Spring – source of water
<b>Roto</b>	Lake
<b>Takiwā</b>	Area, region, district
<b>Takata whenua</b>	Iwi or hapu that holds mana whenua (customary authority) in a particular area
<b>Tuna</b>	Eel
<b>Whakapapa</b>	Genealogy
<b>Whānau</b>	Family

## **Appendix: 2**

The following Issues/Objectives/Policies of the Kāi Tahu ki Otago Natural Resource Management Plan 2005 are seen as relevant to the above proposal. This relates to the holistic management of natural resources from the perspective of local iwi.

### **Kāi Tahu ki Otago Natural Resource Management Plan 2005**

#### **Otago Region / Te Rohe o Otago**

##### **Wai Māori**

##### **Wai Māori General Issues**

###### **Discharges**

- Cumulative effects of discharges.
- Discharge of human waste and other contaminants from point and non point source discharges to water
- View that due to dilution rates, discharges to water have little or no effects.

##### **Wai Māori General Objectives**

- There is no discharge of human waste directly to water.
- Contaminants being discharged directly or indirectly to water are reduced.

##### **Wai Māori General Policies**

- To protect and restore the mauri of all water.

###### **Discharges**

- To require land disposal for human effluent and contaminants.
- To require consideration of alternatives and use of new technology for discharge renewal consents.
- To require monitoring of all discharges be undertaken on a regular basis and all information, including an independent analysis of monitoring results be made available to Kāi Tahu ki Otago.
- To encourage Management Plans for all discharge activities that details the procedure for containing spills and including plans for extraordinary events.
- To require all discharge systems be well maintained and regularly serviced. Copies of all service and maintenance records should be available to Kāi Tahu ki Otago upon request.

#### **Wāhi Tapu**

##### **Wāhi Tapu General Issues**

- Contamination by discharges and other activities seriously erodes the cultural value and integrity of wāhi tapu.

##### **Wāhi Tahu Objectives**

- All wāhi tapu are protected from inappropriate activities
- Kāi Tahu ki Otago have access to wāhi tapu.
- Wāhi tapu throughout the Otago region are protected in a culturally appropriate manner.

##### **Wāhi Tapu General Policies**

- To require consultation with Kāi Tahu ki Otago for activities that have the potential to affect wāhi tapu.

###### **Discharges**

- To discourage all discharges near wāhi tapu.

## **Mahika Kai and Biodiversity**

### **Mahika Kai and Biodiversity General Issues**

- Point and non-point source discharges impacting on mahika kai
- Human waste disposal to mahika kai areas

### **Mahika Kai and Biodiversity General Policies**

- To promote catchment based management programmes and models, such as Ki Uta Ki Tai.

## **Cultural Landscapes**

### **Cultural Landscapes Issues**

- There is a prevailing view that Kāi Tahu ki Otago interests are limited to Statutory Acknowledgements, Tōpuni and Nohoaka sites.

### **Cultural Landscapes Objectives**

- The cultural landscape that reflects the long association of Kāi Tahu ki Otago resource use with in the Otago region is maintained and enhanced.

## Karen Bagnall

---

**From:** Tania Richardson <vania@aukaha.co.nz>  
**Sent:** Wednesday, 17 July 2019 1:08 p.m.  
**To:** Public Enquiries  
**Subject:** RE: Queenstown Lakes District Council - Publicly Notified Application RM19.051  
**Attachments:** J002054 - Queenstown Lakes District Council-discharge ww to water.docx

Kia ora ☺

Trust your day is going well ☺ Lovely out today.

In reply to the following questions:-

It is on our submission – **we do wish to be heard**

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

**Yes**

I, **am not** (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, **am** (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

I, **do** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do not** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have** served a copy of my submission on the applicant – **To Beca – QLDC's Consultant**

Thanks ☺

Kā mihi

**Tania Richardson**  
**Consents Officer**

Kia pai tō rā  
(have a good day)

Telephone: (03) 477 0071  
Mobile: 021 333 595  
Email: [vania@aukaha.co.nz](mailto:vania@aukaha.co.nz)  
Website: [www.aukaha.co.nz](http://www.aukaha.co.nz)

**From:** [REDACTED]  
**To:** [Submissions: alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)  
**Subject:** Submission to discharge untreated water  
**Date:** Thursday, 11 July 2019 8:17:07 p.m.  
**Attachments:** [attachment 1.png](#)

---

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

Applicant Details: Kelly Graham

Applicant: Queenstown Lakes District Council

Application No: RM19.051.01

Consent Type: Discharge Permit

Purpose: To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Map reference: Various locations throughout the Queenstown Lakes district

Legal description: Various locations throughout the Queenstown Lakes district

Submitter Details: Kelly Graham

Full Name/s: Primary contact: [REDACTED]

Full Postal Address: Post Code: [REDACTED]

Mobile Ph: [REDACTED]

Email address: [REDACTED]

Signature/s of submitter:



Submission No:

Please tick one of the following submission types regarding the application:

Do you: Oppose Yes

Do you: Wish to be heard Yes

The specific parts of the application/s that this submission relates to are: that the consent not be allowed in its entirety due the fact it does not meet the requirements under the National Policy Statement for Freshwater Management (NPSFM) specifically in regard to:

Safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species.

Safe guarding the health of people who come into contact with the water.

National Policy Statement for Freshwater Management A. Water quality Objective A1 To safeguard: a) the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, of fresh water; and b) the health of people and communities, as affected by contact with fresh water; in sustainably managing the use and development of land, and of discharges of contaminants.

Maintaining or improving the overall quality of fresh water within a freshwater management unit.

National Policy Statement for Freshwater Management Objective A2 The overall quality of fresh water within a freshwater management unit is maintained or improved while: a) protecting the significant values of outstanding freshwater bodies; b) protecting the significant values of wetlands; and c) improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated.

Improving water quality so that it is suitable for primary contact more often .

National Policy Statement for Freshwater Management Objective A3 The quality of fresh water within a freshwater management unit is improved so it is suitable for primary contact more often, unless: a) regional targets established under Policy A6(b) have been achieved; or b) naturally occurring processes mean further improvement is not possible.

In the event that a consent is granted then it must contain clear and strict requirements for infrastructure upgrades to occur within defined time period of no longer than 10 years so that these discharges are reduced and eliminated. Any such consent granted must be short-term so that the effectiveness of these upgrades, and also the performance of ORC's compliance team in undertaking the necessary monitoring and enforcement, is reviewed once again in the public arena. Transparency and an accountable promise that both organisations QLDC AND ORC work together to work towards reducing spills to zero over a set and agreed time frame.

The reasons for this submission are:

ORC is responsible for safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species, as per the National Policy Statement for Freshwater Management (NPSFM).

ORC is responsible for safe guarding the health of people who come into contact with the water (NPSFM).

ORC is responsible for maintaining or improving the overall quality of fresh water within a freshwater management unit (NPSFM).

"The applicant, QLDC, has failed to demonstrate how ORC can possibly grant the consent sought whilst ensuring that ORC's statutory obligations under the NPSFM are satisfied at all times"

Both ORC and QLDC, under section 6 (e), 7 (a) and 8 RMA, are responsible for recognising and providing for, having particular regard to, and taking into account both the principles of the Treaty of Waitangi and matters of importance to iwi. These values include but are not limited to:

Protecting the mauri of our waterways. Mauri is the life energy which binds and animates all things in the physical world. It is the force behind that which is manifested, the force that

sparkles alive the waterways, the force of beat in the human pulse, the force that shines out through the native greenery. Discharging untreated water into waterways will diminish and degrade mauri.

To aid further understanding, a breakdown of the word mauri may help:

Ma = To be connected to, bound to, linked to, joined

Uri = Descendants. All things, seen and unseen

Protecting whakapapa. Whakapapa is the word for connections and relating. If the Enlightenment view is epitomised in 'I think therefore I am', the Maori understanding is 'I relate therefore I am'. In this cultural context, whakapapa refers to the need to treasure relationships, including the human relationship with water.

Upholding our responsibility as Kaitiakitanga of the whenua. In a cultural context our role is guardian or protectors of the land, and our function is to understand the significant values of outstanding freshwater bodies and to improve the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated. Kaitiakitanga refers to our need to lead the conversation about conservation - as people, organisations and businesses, and collaborate on how we protect and enhance the mauri of this water.

Wahi taonga refers to places in the landscapes that are treasured and in need of acknowledgement and protection. This includes our Central Lakes waterways and lakes which are precious and unique to us.

It is understood that the drains in the Queenstown region have unique issues with high fat content (and blocking), and discharge from industry in to drains. This is a related concern to me, and I am requesting that:

More emphasis be placed on educating the public on what is NOT flushable or drainable. Our biological system, which is excellent, can only accept the 3 P's- poo, pee, paper. Nothing else!

More stringent conditions are put in place in regards to households and industry discharge, including investment in more stringent monitoring of household and trade waste bylaw.

That no consent is granted unless it is for a very limited term, with stringent monitoring, and review provisions, and clear timelines within which QLDC must upgrade infrastructure so that these discharges are reduced and eliminated within a very clear timeframe.

I am concerned that ORC will not provide adequate monitoring and enforcement of these discharges and the required upgrades unless it is clearly defined on the aforementioned short-term consent, so that it may be given priority in ORC's compliance monitoring programme. It is a fact that ORC embarked on an Urban Water Strategy in 2017. It was agreed by ORC (worked on it partnership with QLDC) but has not progressed into an actual plan. So as a result has no teeth. Unfortunately there have been additional delays in doing this with the new NPSFM being proposed and now the complete review of the Water Plan: Otago. However there are key points in here about needing to upgrade infrastructure, partnership etc etc. **THIS MUST BE PRIORITISED** if we seek outcomes of the overall quality of fresh water within a freshwater management units are to be maintained or improved.

Submission No:

I seek the following decision from the consent authority: that the consent not be allowed in its entirety due to the reasons above.

Yours sincerely,

Kelly Graham.

Submission number:

Submission Form 13 to the Otago Regional Council on Consent Application RM  
19.051

**This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.**

**Submitter Details:** Kelvin Peninsula Community Association

**Full Postal Address:** c/o [REDACTED]

**Preferred contact phone number:** [REDACTED]

**Email address:** [REDACTED]

We wish to submit an OPPOSE submission on the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: *(Give details)*

- The application's failure to meet National Policy Statement for Freshwater Management requirements.
- The application's failure to meet Water Conservation (Kawarau) Order 1997 requirements.
- The application's failure to meet local communities' clearly stated requirements for at minimum maintenance of freshwater quality - for landscape, ecological, potable water, recreation and other values.
- The application's inherent message that it is okay to discharge an unspecified amount of untreated wastewater into our most valued water bodies, rather than prevent the same - for 35 years.
- Reasons for allowing discharge being too broad.

My/Our submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views)*.

KPCA represents the community of Kelvin Peninsula, which forms the southern shore of Frankton Arm on Lake Wakatipu. The almost pristine nature of Frankton Arm as a visual landscape feature, ecological entity, potable water source and recreational resource is fundamental to the reasons many residents and holidaymakers have homes here. It is our daily foreground and summertime playground. We walk, cycle, bike and meander along the lakeside track, and the water purity is fundamental to our enjoyment of this. We can see the trout swimming in pools under Kawarau Falls bridge. We are about to see the Frankton Marina completed, welcoming recreationalists and their boats to enjoy our environment.

QLDC seeking a 35-year resource consent to discharge unspecified quantities of untreated wastewater into this shallow, slow-moving body of water is anathema to everything that living and holidaying here means for us. That QLDC is asking for this consent across the district to discharge untreated wastewater into all our major recreational lakes and rivers would suggest an abrogation of their duty of care and responsibility.

Rather than seek an unlimited and long-term “get out of the poo pond free card,” QLDC should be seeking to rectify infrastructural problems and educate the public and visitors to prevent these problems. It can do both of these things outside of the resource consent regime. Indeed, one would have thought that they would be inherently motivated to be doing so already.

We accept that fines for breaches are not an efficient use of ratepayers’ funds. But if the default setting is that “accidents” can happen without censure or consequence, there is much less incentive for council to make the moves necessary to prevent them. Long-term, this mindset would be more expensive than the fines. For both the environmental and financial bottom lines.

We have this past summer seen Lake Hayes, Frankton beach and Queenstown Bay closed to swimmers at various times because of water quality issues. This has a hugely detrimental impact not only on us as residents, but also on our visitors and on our reputation as a resort. These issues are not even raised, much less analysed, in this application. They are too serious to ignore.

Both Queenstown and Wanaka water supplies failed the most recent Ministry of Health drinking water survey re-microbiological “maximum allowable values” allowed in drinking water supplies, requirements tightened in the wake of the 2016 Havelock North gastro outbreak. Allowing council to be lax in their approach to protecting our lakes - which are, after all, the source of our potable water supplies - would be a negative move.

Moving now to our specific concerns, in terms of QLDC’s/ORC’s legal requirements:

### **Water Conservation (Kawarau) Order 1997**

Lake Wakatipu, the Kawarau and Shotover Rivers are protected by this Water Conservation Order. Schedule two of this order specifies the values that are to be protected and protections that must apply. We do not need to repeat these here. All three are recognised as “nationally outstanding” and all three must be managed to allow contact recreation (plus other standards). As per the above examples, we have already seen some of our most popular swimming spots closed to the public during summer because of overflows and poor water quality. To specifically allow such to happen removes the sanction against - thus changing the mindset and removing financial and political imperatives to expedite improvements and educate the public.

There is no indication that the above water quality standards would be satisfied if this consent were granted. There is no outline of how QLDC would ensure that they were. A consent cannot be granted in breach of the WCO restrictions and prohibitions. This application is also inconsistent with the intent and spirit of the WCO.

And although there is not a Water Conservation Order covering the Upper Clutha Catchment, these rivers and lakes are also highly valued for their intrinsic, landscape, ecological, sports fishery, potable water and recreational values, as set out in your own council’s Otago Regional Plan Water. There is an onus on ORC therefore to protect these.

## **National Policy Statement on Freshwater Management**

ORC is responsible for safeguarding freshwater's life supporting capacity, ecosystem processes and indigenous species as per this policy statement. But because this has not yet been given effect in ORC's water plan, the NPS is directly relevant to QLDC's resource consent application.

Its basic tenets are that water quality must either be improved where degraded or maintained where values are currently supported, and that risks to human health from contact with freshwater must be reduced. Discharging untreated wastewater without sanction or encouragement to do otherwise, for 35 years across the breadth of the Queenstown Lakes – Upper Clutha water catchments, obviously would not achieve this.

Further, the NPS also recognises and supports Te Mana o te Wai - the integrated and holistic well-being of freshwater bodies. There is no suggestion within the application that the proposed discharge meets this requirement. It would be disingenuous to do so.

Other requirements of the NPS include:

- safeguarding freshwater's life supporting capacity, ecosystem processes, and indigenous species
- safeguarding the health of people who come in contact with the water
- maintaining or improving the overall quality of freshwater within a freshwater management unit
- protecting significant values of outstanding freshwater bodies
- setting limits on resource use to meet limits over time and ensure they continue to be met.

This latter recognises that meeting NPS requirements will be a journey. It does not suggest a 35 year journey is acceptable. None of these requirements can be met by granting the consent QLDC seeks.

### **Specific Effects**

Among key concerns raised by the application, in terms of inconsistency with the specific standards, spirit and intent of both the NPS, WTO and other issues are:

- Effects on ecosystem health; the Ecology Report identifies impacts including high biochemical oxygen demand, loss of water clarity and increased phytoplankton biomass and nitrogen toxicity. Among other things, these lead to changes in macro invertebrate communities, increased fungal growth and water toxicity, and effects on trout and salmon feeding ranges through reduced visibility.
- Effects on public health; as identified by the NIWA report (appendix D), there would be significant health risks for the assessed scenarios. And apparently the primary mitigation proposed each time that contact recreation standards are breached, and thus serious health risks posed, is to keep people out of the water. We experienced this too often last summer. That was when they didn't have consent to discharge untreated wastewater into our lakes and rivers. Lowering expectations of QLDC's performance is unlikely to make the wastewater system work better. Nor expedite improvements.
- Effects on recreation; interestingly, the effects of preventing access to our lakes and rivers contaminated by QLDC's unmitigated discharge of untreated wastewater was

not even assessed. Considering the importance of our lakes and rivers to not only our resident communities but also our visitors and tourism industry, this is a serious lack of analysis. Reputationally, repeated and ongoing “do not swim, do not drink” messages would be ruinous. This obviously would have a long-term economic impact as well as all the more obvious impacts on ecology, lifestyle, potable water supply et cetera.

### **Breadth of Purpose**

QLDC’s application suggests reasons that they should be allowed to discharge unspecified amounts of untreated wastewater into our much-valued lakes and rivers as being “blockages, breakages, system failures, extreme storm events and capacity exceedance in the network”.

While some of these may be considered “accidents,” most can’t. Most are preventable and in the hands of QLDC. Most should be an intrinsic part of the “fit for purpose” and “resilient” qualities required for council’s wastewater system.

Allowing “capacity exceedance in the network” as a reason to allow discharge of pollution into our pristine lakes and rivers gives carte blanche to poor planning and lax controls on subdivisions and developments.

There is no acceptable reason to breach the NPS, WCO or our communities’ expectations of quality freshwater for the next 35 years because of poor planning by Council and its consultants or poor implementation by developers. Council has just (June 27) accepted a much more stringent control regime for silt management by builders and developers and should be congratulated for this. So why this move to allow far more egregious pollution of our freshwater by Council itself?

Similarly, “extreme storm events” is far too big a carveout of QLDC responsibility. Especially in the face of climate change, which is likely to make such extreme events far more common. On June 27, QLDC councillors unanimously voted to declare a climate change emergency and unanimously accepted a draft climate change mitigation plan. So why, as a base tenet of their freshwater management system, would they not act to mitigate such a serious potential risk as unabated discharge of untreated wastewater during increasingly common major storm events?



“System failures” is also too broad a category of excuse. They should know the vulnerabilities of their systems and have backups in place to prevent overflows in the instance of failures. To give consent to this would reduce the incentive for council to prevent such failures and ensure any such failure was adequately safeguarded against to prevent overflow.

Combining two of the issues above, extreme storm events and network capacity exceedance, we here provide some visual relief. These photos show the new stormwater system feeding into Frankton Arm at Frankton beach. You will note the size of the pipe - huge. You will also note the proximity to the lake - sorry the photos are not joined up, but the “stone river” is continuous from the pipe outlet to the lake. The stone river and fabric channel are considered a wetland and comprise the fifth stage of stormwater mitigation in this system. There are 10 flaxes planted in the stone river. Maybe twice as many as that on the sides. Hardly a wetland. Especially not one adequate in size or absorption capacity to deal with one of these “extreme storm events” for which QLDC want overflow consent. We optimistically assume that the gate held in place by kindling over top of the pipe outlet is a temporary measure and that a more effective filtration system might be included pre-commissioning. But overall, it isn’t reassuring in terms of council’s approach to 3 Waters management being fit for purpose, resilient to climate change and likely to protect our vulnerable Frankton Arm freshwater - especially with its vulnerability to silt aggradation.



## Summary

We understand QLDC’s rationale for asking for this consent is that it becomes a mutual “holding everyone to account” system, so that rather than pay fines, they can instead direct investment into the areas of most impact. This argument has some merit. But its logic is faulty.

It suggests that accountability cannot be applied now, without a resource consent regime in place. In fact, all the systems to improve accountability and performance that could be put in place under a resource consent to discharge an unlimited amount of untreated wastewater into our lakes and rivers for 35 years could also be put in place without one.

And we agree, education is needed to minimise/prevent the blockages and breakages part of the problem. Again, this could and should be in place without a resource consent for 35 years' discharge of wastewater when problems occur.

We appreciate there is substantial funding in the LTP for both growth and maintenance of the Three Waters systems. Giving consent to allow existing problems to continue unabated might give the message to both staff and councillors that in fact this commitment is not so strongly required... there are always competing demands for funding to which it could be diverted. The focus on fixing wastewater problems and improving freshwater quality should be maintained - not diluted by lowering expectations of water quality.

Giving consent to allow wastewater overflow for the next 35 years would be at a substantial cost on so many fronts to our environment, communities, ecological footprint, cultural values, lifestyles and economy.

It is giving the wrong message to our politicians, council staff, community and further afield. Just like with kids, if you lower your expectations, they will be met.

**We seek the following decision from the consent authority**

1. Decline consent.
2. If not declined in full, grant consent for a maximum of five years to ensure necessary upgrades are made in a timely manner to ensure there is capacity to prevent/capture wastewater overflows.
3. That any such consent be accompanied by strong conditions identifying the upgrades required (as per above) and setting deadlines for achieving the same.
4. That any such consent also put in place a detailed and ongoing education programme, for both residents and visitors, to reduce the causes of blockages and breakages.

We do wish to be heard in support of our submission.

We would consider presenting a joint case.

We are not a trade competitor of the applicant.

We are directly affected by an effect as a result of the proposed activity in their application.

We do not wish to be involved in any prehearing meeting that may be held for this application.

We do not request the local authority delegates its functions, powers and duties.

We have served a copy of our submission on the applicant.



Cath Gilmour for KPCA

July 12, 2019

**Submission No:**

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

**This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.**

**Submitter Details:**

**Full Name/s** Ken Saxby and Carol Saxby

**Full Postal Address:** [REDACTED]

**Post Code:** [REDACTED]

**Please provide your preferred contact phone number:** [REDACTED]

**Email address:** [REDACTED]

**I/ we wish to submit a** **OPPOSE**  
**on the application of:**

☐ (choose one) submission

**Applicant's Name:** **Queenstown Lakes District Council**

**Application Number:** **RM19.051.01**

**Location:** **Various locations throughout the Queenstown Lakes district**

**Purpose:** **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

**The specific parts of the application that my submission relates to are: (Give details)**

**The period that this application to discharge raw sewage into the local waterways should be restricted to a maximum of five years in that period the Council must ensure that the system is fit for purpose and that overflows will no longer be required.**

**My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).**

**We strongly oppose the application to allow the discharge of raw sewage into the local waterways for any longer than the shortest possible time and five years as an absolute maximum.**

**Submission No:**

I/We seek the following decision from the consent authority *(give precise details, including the general nature of any conditions sought)*

That the application to discharge raw sewage onto our waterways be restricted to a five year maximum period and that the council be forced to undertake works to ensure that discharges do not occur after this grace period. We would prefer the application to be totally rejected, but can see that this is impractical as the existing infrastructure is inadequate.

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☒ Yes  
☐ No

I, Am Not ☒ (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, Am ☒ (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, Do Not ☒ (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do ☒ request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have ☒ served a copy of my submission on the applicant.



**Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)**

11-Jul-19

(Date)

**Submission No:**

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

**This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.**

### Submitter Details:

**Full Name/s** Kenneth David Fraser

**Full Postal Address** [REDACTED]

Post Co 

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

I/ we wish to submit a **OPPOSE** (choose one) submission  
on the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

**Location:** Various locations throughout the Queenstown Lakes district

**Purpose:** To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

The specific parts of the application that my submission relates to are: *(Give details)*

Any discharge of wastewater into the environment is unacceptable. I oppose the consent completely in total.

My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).

I oppose the whole application, we rely on tourism and promote what a pristine and green environment we have. The council are opting for the cheap option instead of fixing the problem. The whole economy of Queenstown relies on tourism, this consent will be detrimental to local businesses if the negative effects are advertised overseas and possibly affect the whole NZ tourism market.

**Submission No:**

I/We seek the following decision from the consent authority (*give precise details, including the general nature of any conditions sought*)

Refuse to give consent for any discharge into the environment.  
The Queenstown council are trying to avoid facing and fixing the problem with an under performing treatment system. They should upgrade the system to cope with now and future development.

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☐ Yes  
☒ No

I, Am Not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

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- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, Do Not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have served a copy of my submission on the applicant.



**Signature/s of submitter/s** (or person authorised to sign on behalf of submitter/s)

10-Jul-19

(Date)

## Submission No:

### ***Notes to the submitter***

If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.

If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The address for service for the Consent Authority is:

**Otago Regional Council, Private Bag 1954, Dunedin, 9054**  
or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

Submission No:

## Submission Form 13 to the Otago Regional Council on Consent Application RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

### Submitter Details:

Full Name/s Kim Badger

Full Postal Address:

Post Code:

Please provide your preferred contact phone number:

Email address:

I/ we wish to submit a **OPPOSE**  
on the application of:

☐ (choose one) submission

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: *(Give details)*

Any sort of untreated wastewater being discharged I am against.

My/Our submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).*

I know there are restaurants that do not have fat traps when they should.  
Hotels should be regulated by QLDC in regard to signage in their toilets re sanitary items not to be flushed.  
The issue is worsened by having too many tourists/ people in these towns at once.  
More tax on tourists directly to help pay for the infrastructure needed to keep our waterways clear. This is the responsibility of our council to protect our environment. ORC should decline this application and offer solutions to QLDC to raise funds to pay for this important infrastructure. Increase Rates! Or use rates more wisely. Learn from the mistakes made in other areas on this.

Using Lakes as an overflow for wastewater will cause issues for species living in the lakes. It will cause pollution and deadly algae. It will affect the water quality. Both fauna and flora will be affected which will also affect water quality for recreational users of the lakes. It could affect water quality down stream at other towns.  
It will affect all residents and tourists to the region, it could affect people in other regions down stream too.

It seems ludicrous that this is even being considered by QLDC or ORC. It is the responsibility of both organisations to protect the environment and dispose of waste water appropriately. This should be a priority for councils expenditure.

**Submission No:**

I/We seek the following decision from the consent authority (*give precise details, including the general nature of any conditions sought*)

ORC should decline this application and offer solutions to QLDC to raise funds to pay for this important infrastructure. Increase Rates! Or use rates more wisely. Learn from the mistakes made in other areas on this.

It is imperative that councils keep waterways free of wastewater for all people and fauna and flora that will be affected by this if it goes ahead. I speak for my children's generation who will suffer mostly in the future from this sort of decision.

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☐ Yes  
☒ No

I, Am Not ☐ (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, Am ☐ (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, Do Not ☐ (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do Not ☐ request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have ☐ served a copy of my submission on the applicant.

  
**Signature/s of submitter/s** (*or person authorised to sign on behalf of submitter/s*)

12-Jul-19

(Date)

Submission No:

## Submission Form 13 to the Otago Regional Council on Consent Application RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

### Submitter Details:

Full Name/s Kim Badger

Full Postal Address:

Post Code:

Please provide your preferred contact phone number:

Email address:

I/ we wish to submit a **OPPOSE**  
on the application of:

☐ (choose one) submission

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: *(Give details)*

Any sort of untreated wastewater being discharged I am against.

My/Our submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).*

I know there are restaurants that do not have fat traps when they should.  
Hotels should be regulated by QLDC in regard to signage in their toilets re sanitary items not to be flushed.  
The issue is worsened by having too many tourists/ people in these towns at once.  
More tax on tourists directly to help pay for the infrastructure needed to keep our waterways clear. This is the responsibility of our council to protect our environment. ORC should decline this application and offer solutions to QLDC to raise funds to pay for this important infrastructure. Increase Rates! Or use rates more wisely. Learn from the mistakes made in other areas on this.

Using Lakes as an overflow for wastewater will cause issues for species living in the lakes. It will cause pollution and deadly algae. It will affect the water quality. Both fauna and flora will be affected which will also affect water quality for recreational users of the lakes. It could affect water quality down stream at other towns.  
It will affect all residents and tourists to the region, it could affect people in other regions down stream too.

It seems ludicrous that this is even being considered by QLDC or ORC. It is the responsibility of both organisations to protect the environment and dispose of waste water appropriately. This should be a priority for councils expenditure.

**Submission No:**

I/We seek the following decision from the consent authority (*give precise details, including the general nature of any conditions sought*)

ORC should decline this application and offer solutions to QLDC to raise funds to pay for this important infrastructure. Increase Rates! Or use rates more wisely. Learn from the mistakes made in other areas on this.

It is imperative that councils keep waterways free of wastewater for all people and fauna and flora that will be affected by this if it goes ahead. I speak for my children's generation who will suffer mostly in the future from this sort of decision.

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☐ Yes  
☒ No

I, Am Not ☐ (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, Am ☐ (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, Do Not ☐ (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do Not ☐ request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have ☐ served a copy of my submission on the applicant.

  
**Signature/s of submitter/s** (*or person authorised to sign on behalf of submitter/s*)

12-Jul-19

(Date)

## Karen Bagnall

---

**From:** Kim Baker [REDACTED]  
**Sent:** Friday, 12 July 2019 4:42 p.m.  
**To:** Submissions  
**Cc:** alisha.robinson@beca.com  
**Subject:** RM19.051 submission

To whom it may Concern

The following is my submission relation to application no. RM19.051 - full details are below.

This application is being emailed to [submissions@orc.govt.nz] and copied to the applicant at [alisha.robinson@beca.com] Please contact me by return email if there is anything further you need from me in order for the application to be valid.

### 1. My details

Name: Kim Baker

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

### 2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district. The proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

### 3. Whether it is in support or opposition.

I am making this submission to register my opposition to the application in the strongest possible terms.

### 4. Submissions and reasons

Our waterways, rivers and lakes are already under threat from multiple sources, and we should not be allowing discharge of untreated wastewater into these systems under any circumstances. Such discharge threatens to cause both short and long term damage which can and should be avoided.

It should be part of QLDC's responsibility to assess potential points of weakness, failure or blockage, and to put sufficient safeguards in place to ensure that discharge of untreated wastewater is not required. Potential solutions

could include holding tanks, secondary overflow systems, holding ponds, water treatment systems and more. These systems should all be monitored and maintained to a high standard.

The Queenstown Lakes District area is an area of outstanding natural beauty which has become sort after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLD has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted. The QLDC should be held to the highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which could threaten the very reason tourists flock to Central Otago. It simply makes no sense to allow QLDC to pollute our natural resources - resources which are the reason tourists want to come to Central Otago.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? In my view, this is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

5. Decision I wish Council to make.

I ask that the ORC declines QLDC's application for consent, in its entirety, and (if within its powers) directs the applicant to come back with a more sustainable, environmentally friendly plan to deal with waste water.

6. Wish to be heard.

I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

Other declarations:

I AM NOT a trade competitor.

I DO NOT wish to be involved in any pre hearing meeting

I DO NOT request that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

i HAVE served a copy of my submission on the applicant (see the cc line of my email).

Kind regards

Kim Baker

Sent from Kim's iPhone

**From:** [REDACTED]  
**To:** [Submissions: alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)  
**Subject:** application no. RM19.051  
**Date:** Thursday, 11 July 2019 6:08:54 p.m.

---

## 1. My details

Kim Coll

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

## 2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district. The proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

## 3. Whether it is in support or opposition.

I am making this submission to register my opposition to the application in the strongest possible terms.

## 4. Submissions and reasons

Our waterways, rivers and lakes are already under threat from multiple sources, and we should not be allowing discharge of untreated wastewater into these systems under any circumstances. Such discharge threatens to cause both short and long term damage which can and should be avoided.

It should be part of QLDC's responsibility to assess potential points of weakness, failure or blockage, and to put sufficient safeguards in place to ensure that discharge of untreated wastewater is not required. Potential solutions could include holding tanks, secondary overflow systems, holding ponds, water treatment systems and more. These systems should all be monitored and maintained to a high standard.

The Queenstown Lakes District area is an area of outstanding natural beauty which has become sort after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLD has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted. The QLDC should be held to the

highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which could threaten the very reason tourists flock to Central Otago. It simply makes no sense to allow QLDC to pollute our natural resources - resources which are the reason tourists want to come to Central Otago.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? In my view, this is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

5. Decision I wish Council to make.

I ask that the ORC declines QLDC's application for consent, in its entirety, and (if within its powers) directs the applicant to come back with a more sustainable, environmentally friendly plan to deal with waste water.

6. Wish to be heard.

I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

**From:** [REDACTED]  
**To:** [Karen Bagnall](#); [Submissions](#); [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)  
**Subject:** RE: application no. RM19.051  
**Date:** Friday, 12 July 2019 12:32:32 p.m.

---

Further to my previous email...

**I am not** a trade competitor of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

I, **do not** wish to be involved in any pre-hearing meeting that may be held for this application.

I **do** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have** served a copy of my submission on the applicant.

---

**From:** Kim Coll [REDACTED] >  
**Sent:** Thursday, 11 July 2019 6:09 p.m.  
**To:** Submissions <[Submissions@orc.govt.nz](mailto:Submissions@orc.govt.nz)>; [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)  
**Subject:** application no. RM19.051

1. My details

Kim Coll

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of blockages, breakages, system failures,

extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district. The proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

### 3. Whether it is in support or opposition.

I am making this submission to register my opposition to the application in the strongest possible terms.

### 4. Submissions and reasons

Our waterways, rivers and lakes are already under threat from multiple sources, and we should not be allowing discharge of untreated wastewater into these systems under any circumstances. Such discharge threatens to cause both short and long term damage which can and should be avoided.

It should be part of QLDC's responsibility to assess potential points of weakness, failure or blockage, and to put sufficient safeguards in place to ensure that discharge of untreated wastewater is not required. Potential solutions could include holding tanks, secondary overflow systems, holding ponds, water treatment systems and more. These systems should all be monitored and maintained to a high standard.

The Queenstown Lakes District area is an area of outstanding natural beauty which has become sort after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLD has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted. The QLDC should be held to the highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which could threaten the very reason tourists flock to Central Otago. It simply makes no sense to allow QLDC to pollute our natural resources - resources which are the reason tourists want to come to Central Otago.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? In my view, this is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

### 5. Decision I wish Council to make.

I ask that the ORC declines QLDC's application for consent, in its entirety, and (if within its powers) directs the applicant to come back with a more sustainable, environmentally friendly plan to deal with waste water.

6. Wish to be heard.

I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

## Karen Bagnall

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**From:** lauren prebble <[REDACTED]>  
**Sent:** Friday, 12 July 2019 9:12 a.m.  
**To:** alisha.robinson@beca.com; Submissions  
**Subject:** Submission on the resource consent application pursuant to the Resource Management Act 1991.

**Applicant Details:** Lauren Prebble

**Applicant:** Queenstown Lakes District Council

**Application No:** RM19.051.01

**Consent Type:** Discharge Permit

**Purpose:** To discharge untreated wastewater to various freshwater environments. This is under the circumstances where it may enter freshwater throughout the Queenstown Lakes district due to blockages, breakages, system failures and extreme storm events.

The specific parts of the application/s that this submission relates to are: that the consent not be allowed in its entirety due the fact it does not meet the requirements under the National Policy Statement for Freshwater Management (NPSFM) specifically in regard to:

Safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species.

Safe guarding the health of people who come into contact with the water.

This consent application is in violation of NPSFM objective A1, A2 & A3.

It was agreed by ORC (worked on it partnership with QLDC) but has not progressed into an actual plan.

I am concerned that ORC will not provide adequate monitoring and enforcement of these discharges.

Reasons for my submission is:

ORC adhere's to it's responsibility under the (NPSFM) to:

Protect the freshwater ecosystems and life capacity

To safe guard the health of people whom come in contact with water

To maintain and improve the overall quality of our fresh water

I am requesting that:

More emphasis be placed on educating the public on what is NOT flushable or drainable.

More stringent conditions are put in place in regards to households and industry discharge, including investment in more stringent monitoring of household and trade waste bylaw.

Transparency and an accountable promise that both organisations QLDC AND ORC work together to work towards reducing spills to zero over a set and agreed time frame.

I seek the following decision from the consent authority: that the consent not be allowed in its entirety due to the reasons above

**Submission No:**

**Do you: Oppose Yes**

Do you: Wish to be heard Yes

**Lauren Prebble**

LWBTV Content Producer / Presenter / Editor



Virus-free. [www.avast.com](http://www.avast.com)

## Karen Bagnall

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**From:** lauren prebble <[REDACTED]>  
**Sent:** Friday, 12 July 2019 4:53 p.m.  
**To:** Karen Bagnall  
**Subject:** Re: Submission on the resource consent application pursuant to the Resource Management Act 1991.

Hi Karen,

I hope the below covers it. Thank you for your prompts.

I, **am not** a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

I **do not** wish to be involved in any pre-hearing meeting that may be held for this application.

I **do request\*** that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have not** served a copy of my submission on the applicant.

Kind Regards,

Lauren Prebble

**From:** lauren prebble <[REDACTED]>  
**Sent:** Friday, 12 July 2019 9:12 a.m.  
**To:** alisha.robinson@beca.com; Submissions <Submissions@orc.govt.nz>  
**Subject:** Submission on the resource consent application pursuant to the Resource Management Act 1991.

Applicant Details: Lauren Prebble

Applicant: Queenstown Lakes District Council

Application No: RM19.051.01

Consent Type: Discharge Permit

**Purpose:** To discharge untreated wastewater to various freshwater environments. This is under the circumstances where it may enter freshwater throughout the Queenstown Lakes district due to blockages, breakages, system failures and extreme storm events.

The specific parts of the application/s that this submission relates to are: that the consent not be allowed in its entirety due the fact it does not meet the requirements under the National Policy Statement for Freshwater Management (NPSFM) specifically in regard to:

Safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species.

Safe guarding the health of people who come into contact with the water.

Submission No: \_\_\_\_\_

**Submission Form 13 to the Otago Regional Council on consent application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**  
(please print clearly)

Full Name/s Lesley Margaret Anderson

Full Postal Address: \_\_\_\_\_

Post Code: \_\_\_\_\_

Please provide your preferred contact phone number: \_\_\_\_\_

Email address: \_\_\_\_\_

I/ we wish to submit a SUPPORT / OPPOSE / NEUTRAL submission on (circle one) the application of:

Applicant's Name: Queenstown Lakes District Council

Application Number: RM19.051.01

Location: Various locations throughout the Queenstown Lakes district

Purpose: To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

The specific parts of the application/s that my submission relates to are: (Give details)

To discharge untreated wastewater  
to various freshwater environments  
etc - as above

My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).

I oppose this application.  
There must be a better way -  
these "systems" need to be well designed  
and in place before continued expansion of  
subdivisions etc.

Submission No: \_\_\_\_\_

I/we seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)

For ORC to decline QHDC application  
e set guidelines for better "systems"  
put in place by Councils.

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☒ Yes  
☒ No

I, am/am not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

\*If trade competitor chosen, please complete the next statement, otherwise leave blank.

I, am/am not (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, do/do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I do/do not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I have/have not served a copy of my submission on the applicant.

  
Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)

11.07.19  
(Date)

Submission No:

## Submission Form 13 to the Otago Regional Council on Consent Application RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

### Submitter Details:

Full Name/s Linda Julie Danen

Full Postal Address: [REDACTED]

Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

I/ we wish to submit a **OPPOSE**  
on the application of:

☐ (choose one) submission

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: (Give details)

Clause 1.5 - consent duration 35years.  
- This is too lengthy a period.

Clause 2.3 last para re predominant cause of WW overflows.

- Analysis of the data provided (overflow data 2015-2018) indicates that the statement in the application is mis-leading. Although predominant cause may be foreign objects in the system, 25% of overflows are broken pipes or roots. This means that 25% of overflows can be directly attributable to QLDC poor and lack of maintenance over recent decades.

Clause 5.7 - cumulative effects, 'large part of network is under 21 years'

- This is again a mis-leading statement. Although I could not find what % of network is under 21 years (and we needn't be too concerned with young infrastructure) the concern should be with the proportion and kms of pipe that is in excess of 45years, as this is the pipe that is more at risk of breakage and root intrusion. I suspect that if the network aged over 45years were to be mapped, we would find most of it very close to waterways. A break therefore is more likely to cause WW to flow into our waterways, causing unnecessary pollution. I would hope that a condition be placed on QLDC, that all WW network in excess of 45years be itemised, and regularly inspected. And that where there is any hint of degradation, that the pipe be promptly renewed/replaced.

- Not included in the overflow data is the WW pipe break at the top of Turner St, QN on 2nd January 2019. The break was a result of root intrusion into an old tile pipe. Although the QLDC are to be commended for their prompt response at the time, it is important to note the following: 1) the root intrusion should have been picked up by pro-active maintenance given the large area that it serves and the age of the pipe 2) fortunate that a local had a good nose and discovered the problem before the WW started over-flowing down Turner St - If it had, well it would have ended up in the creek alongside Gorge Road, after going through the QLDC library and officers. 3) The temporary fix remained in place for 6 months.

Section 2.4 and 10 Proposed Draft Conditions - Record keeping and Annual Monitoring.  
- At least the annual monitoring report should be made available to the public.

My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).

I oppose the application in principle. QLDC and indeed all local authorities need to change their attitude to operational practices and recognise that priorities need to be reviewed and changed. Although WW overflows may never be eliminated, those that could be prevented by QLDC through more pro-active maintenance should be highly criticised by the Regional Council and the public. A KPI needs to be developed and enforced that encourages better pro-active maintenance. Suggest less than 5% of all WW overflows be the cause of broken pipe or roots. Based on my analysis, QLDC is currently sitting at 25%.

See page 2  
for larger  
print.

## Submission No:

### Submission Form 13 to the ORC on Consent Application RM19.051

*(large print relating to The specific parts of the application that my submission relates to)*

Clause 1.5 - consent duration 35years.

- This is too lengthy a period.

Clause 2.3 last para re predominant cause of WW overflows.

- Analysis of the data provided (overflow data 2015-2018) indicates that the statement in the application is mis-leading. Although predominant cause may be foreign objects in the system, 25% of overflows are broken pipes or roots. This means that 25% of overflows can be directly attributable to QLDC poor and lack of maintenance over recent decades.

Clause 5.7 - cumulative effects. 'large part of network is under 21 years'

- This is again a mis-leading statement. Although I could not find what % of network is under 21 years (and we needn't be too concerned with young infrastructure) the concern should be with the proportion and kms of pipe that is in excess of 45years, as this is the pipe that is more at risk of breakage and root intrusion. I suspect that if the network aged over 45years were to be mapped, we would find most of it very close to waterways. A break therefore is more likely to cause WW to flow into our waterways, causing unnecessary pollution. I would hope that a condition be place on QLDC, that all WW network in excess of 45years be itemised, and regularly inspected. And that where there is any hint of degradation, that the pipe be promptly renewed/relined.
- Not included in the overflow data is the WW pipe break at the top of Turner St, QN on 2nd January 2019. The break was a result of root intrusion into an old tile pipe. Although the QLDC are to be commended for their prompt response at the time, it is important to note the following: 1) the root intrusion should have been picked up by pro-active maintenance given the large area that it serves and the age of the pipe 2) fortunate that a local had a good nose an discovered the problem before the WW started over-flowing down Turner St - If it had, well it would have ended up in the creek alongside Gorge Road, after going through the QLDC library and officers. 3) The temporary fix remained in place for 6 months.

Section2 4 and 10 Proposed Draft Conditions – Record keeping and Annual Monitoring.

- At least the annual monitoring report should be made available to the public.

**Submission No:**

I/We seek the following decision from the consent authority *(give precise details, including the general nature of any conditions sought)*

That the application be declined in it's current form.

That the application be accepted with the amendments:

- 1) Reduce duration to 10years.
- 2) Add a KPI in the conditions that WW overflows caused by pipe breaks or roots be be less than 5% of all WW overflows (or could be x number per 1000km of network).

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☐ Yes  
☒ No

I, Am Not ☒ (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, Am ☒ (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

I, Do Not ☒ (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do ☒ request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have ☒ served a copy of my submission on the applicant.

  
  
\_\_\_\_\_  
**Signature/s of submitter/s** (or person authorised to sign on behalf of submitter/s)

12-Jul-19

\_\_\_\_\_  
(Date)

Submission No:

## Submission Form 13 to the Otago Regional Council on Consent Application RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

### Submitter Details:

Full Name/s Loris Eileen King

Full Postal Address:

Post Code:

Please provide your preferred contact phone number:

Email address:

I/ we wish to submit a **OPPOSE** (choose one) submission on the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: *(Give details)*

Any discharge of wastewater into the lakes and waterways in the Queenstown Lakes District area.

My/Our submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views)*.

I oppose all as above as our lakes, creeks and waterways are crucial to our area remaining a pristine and a wonderful place for all.

**Submission No:**

I/We seek the following decision from the consent authority (*give precise details, including the general nature of any conditions sought*)

A total ban on any wastewater discharge onto the lakes, creeks and waterways in the Queenstown Lakes District Council area.

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☐ Yes  
☒ No

I, Am Not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, Am (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, Do Not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have served a copy of my submission on the applicant.

**Signature/s of submitter/s** (*or person authorised to sign on behalf of submitter/s*)

12-Jul-19

(Date)

## Submission No:

### ***Notes to the submitter***

If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.

If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The address for service for the Consent Authority is:

**Otago Regional Council, Private Bag 1954, Dunedin, 9054**  
or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

Submission No:

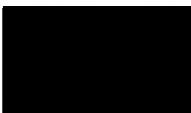
**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

Full Name/s Lynn Ann Campbell submission document wouldn't accept 

Full Postal Address:



Post Code:



Please provide your preferred contact phone number:



Email address:



I/ we wish to submit a **OPPOSE**  
on the application of:

(choose one) submission

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: *(Give details)*

I **OPPOSE** - There is no excuse for "and Capacity Exceedance in the Network that cause overflows to the wastewater infrastructure".

I understand unforeseen, storm/flooding natural disasters but Capacity Exceedance of Network - **NO** - not in this age of environmental care and Health and Safety.

My/Our submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views)*.

**OPPOSE** - The Discharge of untreated raw sewerage into the lakes and waterways of QLDC district - for ONE or 35 Years as a Result of "CAPACITY EXCEEDENCE IN THE NETWORK THAT CAUSES OVERFLOWS TO THE WASTEWATER INFRASTRUCTURE.

QLDC, ORC, DOC, Ministry of the Environment and Government of New Zealand should be leading the preservation of our "100% Pure NZ" as an

**Submission No:**

*I/We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)*

That the - "Capacity Exceedence in the Network" be removed from this RM application - COMPLETELY.

QLDC be charged as a matter of urgency to put in place both temporary and permanent untreated raw sewerage disposal alternatives/systems to MEET and not just cope "sometimes" with the "Raw Untreated Sewerage CAPACITY requirements of this district"

I/we:

- ☐ Wish to be heard in support of our/my submission  
☒ Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- ☒ Yes  
☐ No

I, Am Not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, Am (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, Do (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have served a copy of my submission on the applicant.

Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)

11th July 2019

(Date)

**The specific parts of the application that my submission relates to are: *(Give details)***

OPPOSE - There is no excuse for "and Capacity Exceedance in the Network that cause overflows to the wastewater infrastructure".

I understand unforeseen, storm/flooding natural disasters but Capacity Exceedance of Network - NO - not in this age of environmental care and Health and Safety.

If QLDC hasn't the infrastructure to cope with capacity flows due to visitor numbers (hotels being built etc) then expansion should be halted.

**My/Our submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views)*.**

OPPOSE - The Discharge of untreated raw sewerage into the lakes and waterways of QLDC district - for ONE or 35 Years as a Result of "CAPACITY EXCEEDENCE IN THE NETWORK THAT CAUSES OVERFLOWS TO THE WASTEWATER INFRASTRUCTURE.

QLDC, ORC, DOC, Ministry of the Environment and Government of New Zealand should be leading the preservation of our "100% Pure NZ" as an example to the WORLD. This is the most hypocritical situation ever - come and see our wonderful environment pay \$\$\$ so we can pollute it.

What is this District saying to the present and future generations of this Country/World your health and wellbeing does not count versa's the Tourism Dollar.

I sincerely request whoever is to oversee this decision making process hold WORLD Qualifications in Environmental Care.

**I/We seek the following decision from the consent authority *(give precise details, including the general nature of any conditions sought)***  
**I/we:**

That the - "Capacity Exceedance in the Network" be removed from this RM application - COMPLETELY.

QLDC be charged as a matter of urgency to put in place both temporary and permanent untreated raw sewerage disposal alternatives/systems to MEET and not just cope "sometimes" with the "Raw Untreated Sewerage CAPACITY requirements of this district".

The technology is available. All the worry about electric cars, hair dressers with adequate toilet facilities etc and at the same dumping Raw Sewerage into our fish producing waterways and oceans.

**Submission No:**

***Notes to the submitter***

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You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.

If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The address for service for the Consent Authority is:

**Otago Regional Council, Private Bag 1954, Dunedin, 9054**  
or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

From: [REDACTED]  
To: [Submissions](#)  
Subject: RE: QLDC RM19.051 - PLEASE read First paragraph of this email.  
Date: Thursday, 11 July 2019 1:45:51 p.m.

---

Good Morning Submission Manager Carl

FYI - I just received this reply email from QLDC and my request for active litter wardens.

Given their RM application to discharge Raw Untreated Sewerage into our waterways the first paragraph is "TRULY AMAZING".

Queenstown Lakes District is **world renowned** for its clean mountain air, stunning landscape and **crystal clear water**. Indeed this is why it's such a popular place to live and visit. **Therefore, waste management is something this Council takes very seriously.** We have a good track record when it comes to how we deal with waste, but there is always room for improvement so I thank you for bringing this to my attention.

Can this be added to the pile of communications on QLDC's own application.

Sincerely

Lynn Campbell.

---

Begin forwarded message:

From: Amy Wilson-White <[Amy.Wilson-White@qldc.govt.nz](mailto:Amy.Wilson-White@qldc.govt.nz)>  
Subject: RE: Local littering penalties - bylaws?  
Date: 11 July 2019 at 10:39:10 AM NZST  
To: Lynn Campbell <[REDACTED]>

Morena Lyn,

Thank you for your email.

Queenstown Lakes District is world renowned for its clean mountain air, stunning landscape and crystal clear water. Indeed this is why it's such a popular place to live and visit. Therefore, waste management is something this Council takes very seriously. We have a good track record when it comes to how we deal with waste, but there is always room for improvement so I thank you for bringing this to my attention.

In New Zealand, the enforcement provisions we have available to us for littering are dictated by the Litter Act 1979 and the Resource Management Act 1991. Enforcement is difficult under these rules but we do have other methods at our disposal. QLDC has undertaken a piece of work to address smoking in public areas. Our new Smokefree Policy will update the 2006 policy for playgrounds, sports fields and swimming pools. We will be consulting on this in the New Year and I strongly encourage you to let us know what changes you would like to see regarding education and what level of enforcement is appropriate. We have also been educating local bars to provide cigarette bins to prevent butts entering the stormwater system.

I have lodged a request for service to remove the cigarette butts from the area you have identified and will request a rubbish bin at this location.

Again, thank you for your feedback, observations and suggestions and please do remember to respond to the upcoming community consultation on these issues.

Kind regards

Amy Wilson-White

**Amy Wilson - White** | Executive Assistant to the Mayor  
Queenstown Lakes District Council  
DDI: +64 3 450 1731 | P: +64 3 441 0499  
E: [Amy.Wilson-White@qldc.govt.nz](mailto:Amy.Wilson-White@qldc.govt.nz)



**From:** Lynn Campbell [mailto: [REDACTED]]  
**Sent:** Tuesday, 9 July 2019 10:26 AM  
**To:** Jim Boulton <[jim.boulton@qldc.govt.nz](mailto:jim.boulton@qldc.govt.nz)>  
**Subject:** Local littering penalties - bylaws?

Morning Jim

I just decided to stop and 'smell the roses' so to speak in our busy lives - so I spotted a seat at the top of panorama terrace so stopped to take five and enjoy the morning sunshine - instead of enjoying nature's best, I left with raised blood pressure and the feeling of being pissed off.

As a community we try and provide wonderful experiences for visitors and locals - but this is not on.

Along with visitor levy great move - 25 years late (not your fault) can we have - not a slap on the wrist but serious instant fines for people who disrespect our environment like ie Singapore.

The \$\$\$ being spent by ratepayers and business to keep the district clean.

Sick of seeing people just flicking their butts all over the place.

A few signs get the word out - parking officers/litter officers. More revenue - less clean up costs. Chewing gum/litter and cig butts.

Thanks Lynn





and in 2011, nearly 9,000 people were charged for littering. In Singapore, fines can reach \$1,000 for first time offenders and littering fines range from \$300 to \$1,000 for first time offenders. Both fines rise up to \$5,000 for third-time offenders with the possibility of facing jail time.

**Karen Bagnall**

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**From:** [REDACTED]  
**Sent:** Friday, 12 July 2019 5:28 p.m.  
**To:** Submissions  
**Subject:** FW: submission re qldc wanting to discharge wastewater to our rivers

**From:** [REDACTED]  
**Sent:** Friday, 12 July 2019 5:27 PM  
**To:** [REDACTED]  
**Subject:** submission re qldc wanting to discharge wastewater to our rivers

Submission re

Applicant's Name: Queenstown Lakes District Council Application Number: RM19.051.01 Location: Various locations throughout the Queenstown Lakes district

Purpose: To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

My submission is to oppose this application for reasons of ecological and human health .

I seek the consent authority decline this application.

I Do not wish to be heard in support of my submission

I, am not a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

I, do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I am serving a copy of my submission on the applicant with this email.

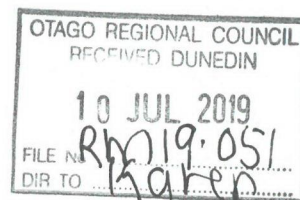
Your faithfully  
Lynne Stewart

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The address for service for the Applicant is: Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300 Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

Submission No: RM19.051



Sub

**Submission Form 13 to the Otago Regional Council on consent application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**  
(please print clearly)

Full Name/s Margaret + John Wilkinson

Full Postal Address: [REDACTED]

Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

If we wish to submit a ~~SUPPORT~~ OPPOSE ~~NEUTRAL~~ submission on (circle one) the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application/s that my submission relates to are: (Give details)

Totally oppose all untreated wastewater  
into any various freshwater receiving environments.

My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).

Totally oppose any and all untreated  
wastewater into any various freshwater receiving  
environments

Submission No: RM 19.051

*/We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)*

To stop / oppose this application to  
discharge wastewater into any various  
freshwater receiving environments

*/We:*

- ☐ Wish to be heard in support of our/my submission  
☒ Not wish to be heard in support of our/my submission

If others make a similar submission, */we* will consider presenting a joint case with them at a hearing.

- ☐ Yes  
☒ No

I, ~~am~~/am not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, ~~am~~/am not (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- ☒ a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, ~~do~~/do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I ~~do~~/do not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I ~~have~~/have not served a copy of my submission on the applicant.

[Signature]  
Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)

7/7/19  
(Date)

Submission No: RM 19.051

**Notes to the submitter**

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Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)