

Karen Bagnall

From: Fiona Mangos [REDACTED]
Sent: Friday, 12 July 2019 2:25 p.m.
To: Submissions
Cc: alisha.robinson@beca.com
Subject: Re: FW: Submission relation to application no. RM19.051

Further to my submission [at the bottom of this email]....

- 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: I, am/am not (choose one) directly affected by an effect as a result of the proposed activity in the application that adversely affects the environment; and 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.

1. My details

Name: Fiona Mangos

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

Note: My submission is as an individual and concerned resident of the Lakes District, and not as an employee of ORC.

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 strong 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.

Ngā mihi

Fiona Mangos

m: [REDACTED]

e: [REDACTED]

On Fri, Jul 12, 2019 at 10:38 AM Karen Bagnall <karen.bagnall@orc.govt.nz> wrote:

Good morning – 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 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

Otago Regional Council

70 Stafford St
Private Bag 1954 Dunedin 9054

P (03) 474 0827 or 0800 474 082

karen.bagnall@orc.govt.nz
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

From: Fiona Mangos [REDACTED]
Sent: Thursday, 11 July 2019 3:04 p.m.
To: Submissions <Submissions@orc.govt.nz>
Cc: alisha.robinson@beca.com
Subject: Submission relation to application no. RM19.051

Hello

This application is being emailed to 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: Fiona Mangos

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

Note: My submission is as an individual and concerned resident of the Lakes District, and not as an employee of ORC.

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 strong 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.

Regards

Fiona Mangos

Southern Office

Box 6230
Dunedin 9012

021 222 5092
s.maturin@forestandbird.org.nz



11.07.2019

Address for service

Sue Maturin
Southern Office
Box 6230
Dunedin 9012
021 222 5092
s.maturin@forestandbird.org.nz

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

I, **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** 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.

Forest and Bird wishes to be heard and if others make a similar submission we will consider presenting a joint case with them.

Forest and Bird wishes to be involved in any pre hearing meeting regarding this application.

A copy of this submission has been served on the applicant.

Forest and Bird Submission to RM 19.051.01 – QLDC Discharge untreated Sewage

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 Waste water infrastructure throughout the Queenstown Lakes district

Introduction

1. The Royal Forest and Bird Protection Society of New Zealand Incorporated (Forest & Bird) is New Zealand's largest independent nature conservation organisation, with many members and supporters. We have 47 branches throughout the country which are involved in a wide range of conservation and advocacy activities, including our Central Otago Lakes Branch.

Scope of Submission

2. Forest and Bird opposes the application in full and requests that the application be declined in its current state.
3. Forest and Bird notes that the application is intended to include wastewater collection network areas which are not currently owned or managed by QLDC but have the potential to be in the future including existing and new parts of the network. Forest and Bird opposes this.
4. Forest and Bird understands that accidents happen, however the values of the receiving environments are significant and need to be safeguarded and protected from the cumulative impacts of accidental discharges and waste water networks need to be designed, maintained and upgraded to avoid overflows and accidental discharges of untreated sewage to water ways . Forest and Bird appreciates that the wastewater network is relatively new and does not warrant replacing. However Queenstown is experiencing rapid growth and the infrastructure needs to be upgraded in advance.
5. Forest and Bird is opposed to this consent being granted for 35 years.

Particular Concerns

6. The volunteered consent conditions only specify that the discharges will be undertaken in accordance with the AEE. The AEE is based on the current discharge pattern and the potential effects have not been considered for possible changes in the discharge patterns... As Queenstown is growing and infrastructure ages it is likely that discharge volumes and frequencies will increase. This needs to be addressed as if discharges were to increase, then it is likely there would be higher levels of affects than has been described in Table 2 of their report. This will flow through to the risks and potential effects summarised in Table 7 of their report.
7. The volunteered conditions do not put any limit on the volume or frequency of discharge, consequently there is a risk that the consent could provide for long term adverse effects as it allows for the possibility of frequent large discharges.
8. The consent conditions need to establish limits on the quantity and frequency of discharges.
9. The consent conditions should be structured so that continual improvement is required over time. The proposed investment in waste water networks sits outside of the consenting

regime. This means that there is no legally binding requirement to improve the performance which the applicant has recognised as being necessary.

Potential Adverse Effects

10. The AEE generally does a good job in describing the potential adverse effects except with respect to Lake Hayes and Mill creek where it assumes the receiving environments will remain degraded over the duration of the consent and therefore will be less sensitive to additional nutrients. The report identifies that there are potentially diverse ecological effects arising from the proposed application. As stated in the AEE Impacts include, but are not limited to,
11. Increased fungal growth, changes in macroinvertebrate communities, reduced visibility effecting trout and salmon feeding ranges and water toxicity. These adverse effects and their prevalence or severity can be attributed to the specific freshwater receiving environment and nature (volume, duration) of the overflow event.

Native Fish

12. Forest and Bird is particularly concerned with our native freshwater fish. New Zealand native freshwater fish are under many stresses: water quality decline, habitat destruction, blockage to migration, predation and reduction in water flow. All these stresses threaten the wellbeing of our native freshwater fish and they never occur in isolation. The cumulative effect of the aquatic stresses is reflected in the conservation status of our native freshwater fish. Currently 76% of the country's freshwater fish are threatened or at risk of extinction; . Sewage discharge can cause stress on freshwater fish by altering the pH and oxygen levels in the water. While fish may be able to adapt to some changes in water quality, the speed and frequency with which the changes occur can be a fine line between thriving and barely surviving.
13. Dissolved oxygen is one of the most important elements affecting the biology of fish. A reduction in oxygen levels in the water can result in physiological and behavioural responses. As more energy is used for increased ventilation, there is less energy available for feeding which requires energy to search for food, digest food or absorb nutrients of the food. Fish will require to use the aquatic surface to breath or if possible move to an alternative habitat with higher oxygen. When oxygen is limited predator avoidance will be altered as a result of reduced energy. Further the ability of the fish to select appropriate habitat will be limited by its need to be in proximity of the aquatic surface for respiration, thus leaving the fish more exposed to predation.

Statutory Assessment – Resource Management Act 1991

Section 5 - Purpose

14. Section 5(1) of the RMA states the purpose of the RMA is to 'promote the sustainable management of natural and physical resources. With regard to sustainable management as defined in section 5(2); the proposed remedies and mitigations which include response and infrastructure planning actions are insufficient to adequately avoid remedy or mitigate the effects caused by the overflow events on the environment

Section 6 – Matters of National Importance

15. Section 6 of the RMA addresses the requirement to 'recognise and provide for' matters of national
16. Importance. The applicant has noted that there are rare and threatened species associated with the water bodies that are likely to be impacted. The proposed remedies and mitigations are insufficient to provide for the preservation of the natural character of the impacted water bodies and their margins, or to protect areas of significant indigenous vegetation and significant habitats of the affected water bodies.

Section 104

17. In considering this application regard must be had to among other instruments, the National Policy Statement on Freshwater, the Otago Regional Policy Statement and the Otago Water Plan.

National Policy Statement for Freshwater Management

18. The proposals are inconsistent with the NPS FW particularly Objective A1, Objective A2 and Objective C1. The proposed remedies and mitigations are not adequate to safeguard the life supporting capacity of ecosystems and species. While the proposed measures may seek to protect the significant values and overall water quality there is no certainty that these measures will be undertaken consistently to bring about necessary improvements over the proposed 35 year life of the consent.

Proposed Regional Policy Statement for Otago

19. The proposed application is inconsistent with provisions of the proposed Regional Policy Statement for Otago, especially those in Chapters 3, 4 and 5. The reliance on medium to long term network improvements and the proposed conditions are inadequate to meet the policies and objectives in Chapters 3, 4 and 5.

Operative RPS

20. The proposed application is inconsistent with provisions of the operative Regional Policy Statement for Otago, especially those in Chapters 6, 7, 10, and 13. The reliance on medium to long term network improvements and the proposed conditions are inadequate.

Other Statutory and Non Statutory Matters

21. The proposed application will not meet the purpose of the Lake Wanaka Preservation Act as it does not provide certainty that the lakes water quality will be maintained and as far as possible improved. Similarly the proposed application is inconsistent with the Kawarau Water Conservation Order

Yours sincerely

Sue Maturin
Regional Manager Otago Southland
Forest and Bird

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 FRANKTON COMMUNITY ASSOCIATION

Full Postal Address: PO BOX 2004

Post Code: 9300

Please provide your preferred contact phone number: 027 486 5004

Email address: hello@franktoncommunity.nz

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)

Any waste water discharge to freshwater
bodies as described in the purpose particularly
the Frankton Arm and Kawarau River.

~~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 - see attachment

Submission No: _____

~~4~~ We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)

- See Attachment.

~~4~~ 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, ~~4~~ we will consider presenting a joint case with them at a hearing.

- ☐ Yes
☒ No

I, ~~am/am not~~ ^{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.


GLYN LEWERS F.C.A CHAIR
Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)

12.07.19.

(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

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

Submission close at 5 pm on Friday 12 July 2019

RELIEF SORT

<p>1. Length of Discharge consent reduced to 5 years maximum. Preferably not at all</p>	<p>Current application and practice does not follow the values as prescribed by the ORC water plan policies.</p> <p><i><u>Policy 7.C.1</u> When considering applications for resource consents to discharge contaminants to water, to have regard to opportunities to enhance the existing water quality of the receiving water body at any location for which the existing water quality can be considered degraded in terms of its capacity to support its natural and human use values.</i></p> <p>With regard to proposed future discharge allowance for infrastructure not yet built, this is in direct contradiction of policy 7.C.1. How can this be in keeping with the intent of the policy where there is either no to minimal discharge versus a potential highly concentrated point source pollutant. How is this enhancing the existing water quality?</p> <p>Not to mention the precedent set for all communities along the Clutha that this activity is now acceptable. Would not like to be living in Balcutha.</p> <p><i><u>Policy 7.C.2</u> When considering applications for resource consents to discharge contaminants to water, or onto or into land in circumstances which may result in any contaminant entering water, to have regard to:</i></p> <ul style="list-style-type: none"> <i>(a) The nature of the discharge and the sensitivity of the receiving environment to adverse effects;</i> <i>(b) The financial implications, and the effects on the environment of the proposed method of discharge when compared with alternative means; and</i> <i>(c) The current state of technical knowledge and the likelihood that the proposed method of discharge can be successfully applied.</i> <p>a) Raw waste water into Kawarau river will not meet the existing Conservation Order requirements. namely Restrictions and Prohibitions (ii) water quality to be managed to Class CR standard meaning:</p> <p><i>Class CR Water (being water managed for contact recreation purposes)</i></p> <ul style="list-style-type: none"> <i>(1) The visual clarity of the water shall not be so low as to be unsuitable for bathing.</i> <i>(2) The water shall not be rendered unsuitable for bathing by the presence of contaminants.</i> <i>(3) There shall be no undesirable biological growths as a result of any discharge of a contaminant into the water.</i>
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	<p>How does giving consent to discharge untreated waste water to the Kowarau comply with the Conservation order's existing restrictions and prohibitions? Note clause 2 there is no time limit it is an absolute, it does not matter if the bathing is unsuitable for 1 minute or 1 day, any discharge direct to the Kowarau is in breach of the Conservation Order.</p> <p>b) No alternative method and its financial implications have been offered to assess whether the proposed consent meets this policy. We would suggest that the three point discharge locations within Frankton could be mitigated with appropriate emergency storage and alarms so response can be affected well before a discharge to water occurs. It is our view that traditional emergency storage capacity at pump stations have been compromised by the space being used to increase capacity by way of holding the waste water until downstream infrastructure have the capacity to manage the inflow, upstream, therefore reducing the containment margins, contrary to best practice.</p> <p>c) No comment</p> <p>Given the high public resentment to this application, QLDC should be held to account by the public with full transparency by ORC in setting conditions with regard to this matter. The Public interest should far outweigh any push back related to time and cost spent applying for consents every five years. It will also keep pressure on the two respective Councils to abide by the general Public feeling that such an activity should be prohibited.</p>
<p>2. Discharge consent to only apply to foreign object blockages on existing infrastructure. <u>NO</u> consent to be granted for root penetration, infrastructure capacity, or storm water ingress or any future waste water infrastructure (Kingston, Glenorchy etc.)</p>	<p>We are sympathetic to discharges that occur due to third party behavior outside of QLDC's control. However we do not agree that a carte blanc discharge consent should be allowed for occurrences that QLDC has direct control in avoiding.</p> <p>Kowarau Place pump station is known to have storm water infrastructure directly connected to its catchment network. This was brought to QLDC attention in 2015. To date we are unaware of any efforts to rectify this situation. We also note that the Kowarau Place pump station is not shown on the risk assessment tables.</p> <p>QLDC should be implementing best practice engineering for remedial work to existing waste water infrastructure as well the design for new infrastructure coupled with robust preventative maintenance regime to avoid tree root ingress to existing waste water systems.</p>

	<p>Therefore it is our view a discharge consent that caters for capacity restraints and tree root ingress is not appropriate given they can be obviated by an effective maintenance scheme and best practice engineering design.</p>
<p>3. Discharge consent to place limits on the frequency and volume of discharge to water.</p>	<p>At present if the consent were to be granted there is no limit on the volume and number of discharges to be allowed. Frankton beach Pump station currently handles approximately 2000m³ per day (2015/16 figure). We would be aghast if QLDC were legally allowed to discharge this amount without any legal ramifications.</p>
<p>4. Hydrodynamic study of Wakatipu lake flow to Kawarau Falls with respect to discharge from Frankton Beach Pump Station and discharge point SM53422.</p>	<p>No evidence is provided by the applicant explaining how long discharge dispersal would take and where two. There is no discussion on the weir effect caused by the Kawarau falls whereby waste solids could potentially settle out onto the lake bed and not flow down the Kawarau. This might not happen however there is no evidence provided to show that the lake bed prior to the falls could become a containment bund for waste.</p>
<p>5. Strengthening of proposed consent condition 10 to include reporting on proposed capital spend/project items vs actual for the preceding year, including deferrals and the reasons for them.</p>	<p>All well in good indicating what you are going to do and how much you have spent previously. Far better to see what the applicant planned to do against what they actually achieved. This allows the monitoring authority to actually assess improvements have been made to the waste water system.</p>

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 **Fraser Nicholas Hocks (President Wakatipu Anglers Club)**

Full Postal Address: **5 Morning Star Terrace
Arthurs Point
Queenstown**

Post Code: **9371**

Please provide your preferred contact phone number: **021704988**

Email address: **wakatipuanglersclubnz@gmail.com**

I/ we wish to **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 following parts within the application document:

S1.4.1 Demonstration of overall compliance with standards

S1.5 The Network Consent duration of 35 years

S2.1 Scope of Resource Consent

S2.3 Cause of overflows

S4.7 Community Consultation

S5.7 Cumulative Effects

The following parts within the Assessment of Ecological Effects:

S2.1 Approach to risk assessment

The application does not address (Application Omissions) the following items:

Direct consultation with Wakatipu Anglers Club has not been undertaken although it is noted that Fish and Game have been included.

No assessment of design standards for new wastewater infrastructure

No assessment of the need to upgrade existing infrastructure which would reduce overflows

Submission No: _____

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).

The Wakatipu Anglers Club Oppose the application in its current form for the following reasons:

S1.4.1 Demonstration of overall compliance with standards

Oppose this assessment as it does not outline the infrastructure that does not meet QLDC Standards or other relevant standards that assist preventing overflows that are avoidable. It does not adequately explain why an overflow from this infrastructure should be authorised if the infrastructure is substandard.

S1.5 The Network Consent duration of 35 years

Oppose length of the applicant must show improvement in the performance of the network including undertaking upgrades and implementation of new technologies already available before such a long Consent duration is granted. It appears that the number of overflows is increasing as detailed below:

- 2015/16 (starting from 21/7/2015) - 25 overflows
- 2016/17 - 37 overflows
- 2017/18 - 47 overflows
- 2018/19 - 5 months = 34 overflows (extrapolated year = 82 overflows)

This data directly conflicts the second to last paragraph of s5.7 Cumulative Effects which anticipates the number of overflows to not increase.

The application is focused on response rather than prevention and does not adequately address how instances of non-compliance will be handled. The application claims that all pump stations have level alarms, however it understood that not all pump stations have telemetry, backup pumps, overflow storage and emergency bunding/cut-off drains to prevent overflows from entering water bodies in the first instance. These features are industry standard and required in private networks.

These features shall be a minimum requirement for any pump stations connected to the network and covered under this Network Consent. Addressing these issues should be considered of prime importance, ahead of any consent application to continue to allow “accidental” discharges.

Before such a long Network Consent duration is granted a full audit should be undertaken of the network as it appears there is conflicting information on the numbers of Pump Stations. Riders Assessment of Ecological Effects Report reports 47 pump stations (65 in Beca comments). Fig 13 shows locations of pump stations, but there are 3 pump stations not shown. These being; Bridesdale (Lakes Hayes estate), the next pump station up from Bridesdale, and on Little Alpha Loop Rd (Wanaka) where it is understood that overflows would go into a trout spawning stream.

On this basis adequate risk and effects has not been assessed.

S2.1 Scope of Resource Consent

Oppose as the consent should only authorise discharge of wastewater in situations where adequate infrastructure has been constructed and properly maintained. If overflows occur where no backup pumps, telemetry, overflow storage or emergency bunding is provided then the overflow discharge should not be authorised.

S2.3 Cause of overflows

Submission No: _____

Oppose the statement that it appears to be random. This is incorrect and not enough analysis of the overflows has been undertaken or provided. It is difficult to assess the location or the cause of the overflows in both the application and s92 response. Based on Road names it appears the overflows are focused around older infrastructure.

S4.7 Community Consultation

Oppose the level of consultation. There has been a lack of direct engagement with the Wakatipu Anglers Club. We were not aware of the consent application until it was notified and no one was aware of the drop in sessions that were held last year.

S5.7 Cumulative Effects

The overflow data directly conflicts the second to last paragraph of s5.7 Cumulative Effects which anticipates the number of overflows to not increase. This assessment should be revised, resubmitted and notified so that it addresses the historical performance of the network and why the number of overflows is increasing even though a large part of the network is under 21 years old.

It reports the key factor to this as being ongoing community education but it is clear from the level of community consultation and increasing overflows that there is still not enough community education.

The following parts within the Assessment of Ecological Effects:

S2.1 Approach to risk assessment

Oppose the approach as there appears to be no assessment of the likelihood of the infrastructure failure (ie pump station or pipe bridge failure). If a pump station is likely to fail it will influence the likelihood of overflows. The assessment appears to be missing a risk assessment of pipe bridging which is a high-risk piece of infrastructure with direct links to water bodies.

There is no explanation why 35 sites have been chosen to be assessed. The Riders Assessment of Ecological Effects Report shows 47 pump stations (65 in Beca comments). Fig 13 shows locations of pump stations, but there are 3 pump stations not shown Bridesdale (Lakes Hayes estate), next pump station up from Bridesdale, and on Little Alpha Loop Rd (Wanaka) where it is understood that overflows would go into a trout spawning stream (Bullock Creek). On this basis this risk and effects have not been properly assessed.

Application Omissions

No assessment of design standards for new and existing wastewater infrastructure (no AEE alternatives considered)

No assessment of the need to upgrade existing infrastructure which would reduce overflows

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

The application to be re-notified following the submissions being addressed in the consent application.

Response to consent conditions

1. In General Accordance

Add: Other relevant standards that were not included with the application. Our concern is that infrastructure that does not meet QLDC or industry standards then overflows through a situation that was avoidable is then authorised.

Submission No: _____

4. Maintain Records on Overflows

The locations provided in application and s92 are not specific and cannot be specifically identified. These overflow records should be available to the general public. These records shall be published as part of the ongoing community education and not just available on request to the Regulatory / Consenting Manager, Otago Regional Council.

6. Duration of Consent

The duration of consent should be related to performance and currently the overflows are increasing. We request the consent is limited to 10 years and an independent review including public consultation after 5 years or after each new network is included in the consent.

Add: New Condition

Requiring yearly audits of high risk users such as hospitality providers, trade waste and visitor accommodation providers to ensure they have adequate signage of the what not to put into the sewer network and that their private infrastructure is being adequately maintained.

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.

Fraser Hocks

12/07/2019

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

(Date)

Submission No:_____

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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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.

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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:
- 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

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

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:

Full Name/s Friends of Bullock Creek Incorporated

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

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)*

Discharges of waste water into fresh water
Discharges on to land

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 support the discharge to land, but only in an emergency and subject to conditions. Such conditions could for example be the construction of containment structures for example. We appose the discharge to freshwater bodies as this is completely contrary for good environmental outcomes. Our organization is committed to the protection and improvement of water quality in the Bullock Creek catchment. Discharges as proposed will compromise our organizations objectives and has the potential to degrade the water quality of Lake Wanaka. If the growth of Wanaka needs to be put on hold until such time as QLDC upgrades its waste water infastructure ...so be it.

Submission No:

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

Decline the application to discharge to fresh water
Further investigate conditions to allow for the safe disposal to land in an emergency .

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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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 Not served a copy of my submission on the applicant.



Roger
Gardiner

Digitally signed by Roger
Gardiner
Date: 2019.07.12
08:20:27 +12'00'

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](#).

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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):

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or by email to 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

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 Friends of Lake Hayes Society Inc.

Full Postal Address: c/o 75 Arrowtown-Lake Hayes Road
RD 1,
Queenstown **Post Code:** 9371

Please provide your preferred contact phone number:

Email address:

I/ we wish to submit a **SUPPORT** (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)*

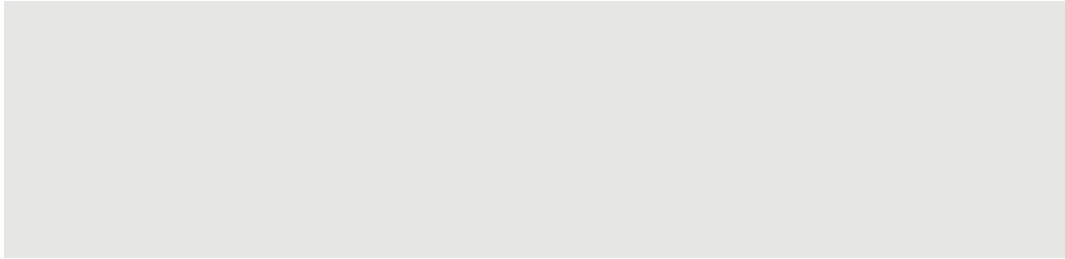
The potential impacts of wastewater spills on the water quality, ecology and environmental health and

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).*

Friends of Lake Hayes Society Inc generally supports the intent of the consent and conditions imposed as a district wide measure. It takes this pragmatic view because it accepts that sewerage spills will inevitably occur from time to time even in the best systems and it would rather see ratepayers money focussed on

Submission No:

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



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)

10/07/19

(Date)

Submission No:

Notes to the submitter

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or by email to 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

From: [R Bowman](#)
To: [Submissions](#)
Cc: [Karen Bagnall](#)
Subject: RE: Queenstown Lakes District Council - Publicly Notified Application RM19.051
Date: Wednesday, 17 July 2019 2:00:50 p.m.
Attachments: [image002.png](#)

Hi Karen

Thanks for your email.

We did in fact indicate our choices on our form but suspect they were not retained in the version that you received at QLDC. We also found we could not insert a signature in the box provided. We suspect there may be a programming and/or software fault in the electronic form.

We have highlighted our choices again in the response to your email below.

I am forwarding this back to ORCsubmissions as requested with a copy to you.

We trust this is satisfactory.

Best regards

Richard Bowman

From: Karen Bagnall <karen.bagnall@orc.govt.nz>
Sent: Wednesday, 17 July 2019 12:24 PM
To: undisclosed-recipients:
Subject: Queenstown Lakes District Council - Publicly Notified Application RM19.051

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

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.*

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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.

Regards



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
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: [R Bowman](#)
To: [Karen Bagnall](#)
Cc: [Submissions](#)
Subject: RE: Queenstown Lakes District Council - Publicly Notified Application RM19.051
Date: Wednesday, 17 July 2019 4:39:38 p.m.
Attachments: [image001.png](#)

Hi Karen

Friends of Lake Hayes Society support the application.

Best regards

Richard

From: Karen Bagnall <karen.bagnall@orc.govt.nz>
Sent: Wednesday, 17 July 2019 3:37 PM
To: R Bowman <bowmanz@actrix.co.nz>
Subject: RE: Queenstown Lakes District Council - Publicly Notified Application RM19.051

Thank you for the information Mr Bowman – could confirm as to whether the Friends of Lake Hayes support, oppose or are neutral with regard to the application.

Many thanks

Karen

From: R Bowman <bowmanz@actrix.co.nz>
Sent: Wednesday, 17 July 2019 2:01 p.m.
To: Submissions <Submissions@orc.govt.nz>
Cc: Karen Bagnall <karen.bagnall@orc.govt.nz>
Subject: RE: Queenstown Lakes District Council - Publicly Notified Application RM19.051

Hi Karen

Thanks for your email.

We did in fact indicate our choices on our form but suspect they were not retained in the version that you received at QLDC. We also found we could not insert a signature in the box provided. We suspect there may be a programming and/or software fault in the electronic form.

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Best regards

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To: undisclosed-recipients:

Subject: Queenstown Lakes District Council - Publicly Notified Application RM19.051

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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).

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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.

Regards



Karen Bagnall

SENIOR CONSENTS SUPPORT OFFICER

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karen.bagnall@orc.govt.nz
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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 gary anderson

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)*

To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages,

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 applicants request in its entirety

Submission No:

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

if you decide to grant permission please do no so for no longer than 5 years, QLDC need to sort this problem out, a 30year plus consent does not give QLDC the motivation required to fix this problem. it is cheaper to pay ORC the fine than do the necessary capital works required

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.*

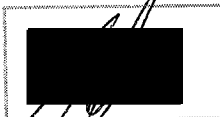
I, Am ☒ (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- 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 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)

03-Jul-19

(Date)

Submission No:

Notes to the submitter

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Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300
Or by email to alisha.robinson@beca.com

Submission No: RM 19.051

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 GAVIN MICHAEL DANN

Full Postal Address: [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)

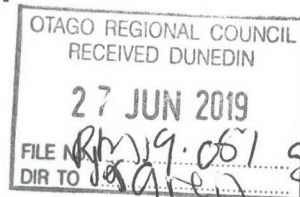
i.e. 2 Philosophy for the Network Consent.

I disagree that overflows "can be managed to a certain degree" as stated in the application.

Overflows can be managed in their entirety.

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).

given a robust preemptive maintenance & inspection regime. QLCD already has consent to discharge up to 45,000 m³/day of liquid effluent to gravel in the Shotover/Kawarau junction. Additions of human waste to this will have adverse affects on downstream use of water, particularly recreational & drinking water take proposed for Alexandra from Lake Dunstan.



Submission No: RM 19-051

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

Downstream affects are not addressed in the application.
They should be.
ORC should consider the overview of 'NZ's clean/green
image' also & how this will be tarnished by allowing
this consent.

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)

22/6/2019
(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

Geoff Marks

Full Postal Address:

[Redacted Address]

Post Code:

[Redacted Post Code]

☐ Work Ph:

☐ Home Ph:

☐ Mobile Ph:

[Redacted Mobile Ph]

☐ Email address:

[Redacted Email Address]

(please tick your preferred Daytime contact number)

Signature/s of submitter/s

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

18/6/19

(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 DISCHARGE OF UNTREATED WASTEWATER INTO
FRESHWATER ENVIRONMENTS.

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

LAKE WAKATIPU AND LAKE WANAKA HAVE A VERY HIGH WATER
QUALITY (MICROTROPIC) SO ANY DISCHARGES WILL CONTRIBUTE
TO SIGNIFICANT NUTRIENT LOADING AND EUTROPHICATION.
THE WATER QUALITY NEEDS TO BE PROTECTED AND PRESERVED
FOR ENVIRONMENTAL, PUBLIC HEALTH AND SOCIO-ECONOMIC
REASONS. ALLOWING ANY LEVEL OF UNTREATED WASTEWATER
TO BE DISCHARGED IS AN UNACCEPTABLE ENVIRONMENTAL,
HEALTH AND SOCIO-ECONOMIC RISK FOR THE SOUTHERN LAKES.

Submission No: _____

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

DECLINE THE DISCHARGE PERMIT.

THE ENVIRONMENTAL, PUBLIC HEALTH AND SOCIO -
ECONOMIC RISKS OF ALLOWING THE DISCHARGE ARE
TOO GREAT TO GRANT CONSENT.

QLDC NEED TO FIND ALTERNATIVE SOLUTIONS TO
MAINTAIN AND IMPROVE THE WASTEWATER INFRASTRUCTURE
TO MITIGATE THE RISKS OF DISCHARGE.

Date submissions close: 5 pm Friday 12th 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

Address for Applicant:

Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300
Or by email to alisha.robinson@beca.com

From: [REDACTED]
To: [Submissions](#)
Cc: [Karen Bagnall](#)
Subject: RE: Notified Application by Queenstown Lakes District Council RM19.051
Date: Friday, 21 June 2019 12:18:01 p.m.
Attachments: [image001.png](#)

I am a trade competitor to the proposal

- **No**

Pursuant to section 100A of the Resource Management Act 1991:

I request that you delegate your functions, powers, and duties required to hear and decide the application to 1 or more hearings commissioners who are not elected members of the Council **Yes** ☐

From: Karen Bagnall <karen.bagnall@orc.govt.nz>

Sent: Friday, 21 June 2019 11:18 a.m.

Subject: Notified Application by Queenstown Lakes District Council RM19.051

Good morning – thank you for your submission on the above notified application. Unfortunately the original submission form supplied by Council omitted the following details;

I am a trade competitor to the proposal

- Yes
- No

Pursuant to section 100A of the Resource Management Act 1991:

I request that you delegate your functions, powers, and duties required to hear and decide the application to 1 or more hearings commissioners who are not elected members of the Council **Yes** ☐ **No** ☐ (tick one)

Notes to Submitter:

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be made to submissions@orc.govt.nz

- **Privacy:** Please note that submissions are public. Your name, contact details and submission will be included in papers that are available to the media and the public, **including publication on the Council website**. You may request your contact details be withheld. Your submission will only be used for the purpose of the notified resource consent process.

- **Independent Commissioner** If you make a request under section 100A of the Resource Management Act 1991, for independent commissioner/s you must do so in writing no later than 5 working days after the close of submissions and you will be liable to meet or contribute to the costs of the hearings commissioner/s.

To constitute a full submission the above information should be provided to Council by close of submissions 5pm Friday 12 July 2019.

Please forward this information to submissions@orc.govt.nz

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

regards



Karen Bagnall

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

karen.bagnall@orc.govt.nz
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

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 Geoffrey James and Margaret Anne Pye

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)*

Discharging untreated wastewater into fresh water 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).

My submission opposes the application for the following reasons.

Discharging raw wastewater is an operating practice from the last century and is an opposite to what the Government is trying to achieve in regard to clean water and swimmable rivers. Other sectors, farmers for example are responding to this strategy in their efforts to meet this goal and are being fined for not complying. This application seeks to do the opposite, discharging waste on an uncontrolled basis without risk of being fined for doing so, the exact opposite of what our country is trying to achieve promoting our clean green image.

The second part of my submission is in relation to the effect untreated wastewater will have on fresh water resources downstream in particular Lake Dunstan.

At present the build up of silt and the formation of sandbanks in the Bannockburn/Kawarau arm of the lake formed from silt coming down the Shotover and Kawarau Rivers is very evident and I see no reason why a plume of wastewater entering the river will not do the same, travel down the swift water of the Kawarau and being lighter than silt even, being deposited on these sand/silt banks. This will have a negative effect on the water as it flows slowly past Cromwell and once the banks dry out or lake level drops after a rain event a massive effect on air quality.

For the reasons stated above we consider granting this application will carry massive negative effects and request the application is declined.

Submission No:

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

Decline the application.

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.*

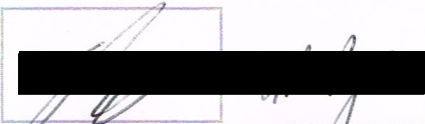
I, Am ☒ (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- 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)

12/7/19.
(Date)

Karen Bagnall

From: Customer Services
Sent: Friday, 12 July 2019 8:58 a.m.
To: Submissions
Subject: FW: Contact Us form - Gerrard Eckhoff

Hey there,

We received the below submission.

Kind Regards,



Soren Olsen
CUSTOMER SUPPORT
REPRESENTATIVE

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

soren.olsen@orc.govt.nz
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: submission <noreply@jotform.com>
Sent: Thursday, 11 July 2019 6:03 p.m.
To: Info <Info@orc.govt.nz>
Subject: Re: Contact Us form - Gerrard Eckhoff



Contact Us form

Name	Gerrard Eckhoff
Email	[REDACTED]
Phone Number	[REDACTED]
Enquiry Type	submission
Your message	Submission on the consent application by QLDC on the 35 year consent to discharge to water.

This application must be contrary to the NPS on fresh water. I am aware that emergency situations occur but a 35 year consent to discharge and pollute is unacceptable in this day and age.. Such a consent allows for addition nutrient, other than that which flows in naturally - to enter water bodies that are iconic.

The 35 year application is unbelievable . Why did not the QLDC not make the application 50 years instead of 35? If 35 years is good for the QLDC then a 50 year consent must be even better. Has there been discussion over the time frame of this application between ORC and QLDC. I suspect so.

How is it possible for one standard to be set for industry and another for a local authority. No farmer would every get away with saying -oh well we were faced with exceptional circumstances. The is one standard for rural and another for urban. That is very obvious . Nobody has the right to pollute their neighbour downstream of a convenient outlet . Cr bell and I have seen the outlet of the Queenstown sewage treatment plant 1st hand some years ago. I was horrified to see solids entering the river yet was told later it met the standard. No industry would be allowed such a discharge .

The credibility of the ORC has long since dissolved . There is a chance now for the ORC to re establish itself

. This 35 year application is simply a licence to pollute . It cant happen.

Once the great southern lakes change from their current fragile state they will be lost forever . Has the lake Hayes situation not yet sent a clear message to the ORC?

If not what does it take.

You can [edit this submission](#) and [view all your submissions](#) easily.

Karen Bagnall

From: Gerry & Marg Eckhoff <[REDACTED]>
Sent: Friday, 12 July 2019 5:56 p.m.
To: Submissions
Subject: QLDC consent

Further to my submission

The cost of living in the wonderful Southern lakes environment such as Queens town Wanaka , Hawea carries with it responsibilities by all to maintain the highest possible standard in order to maintain these lakes in their present condition – if not better than present

I wish to be heard

I do not wish to join with others

I am not a trade competitor

I am not directly effected by the proposed activity (but we all are indirectly)

I do request /require that the local authority delegates its functions powers and duties to hear the application and make recommendations to the local authority

I HAVE NOT SENT A COPY OF MY SUBMISSION ON THE APPLICANT

Gerrard Eckhoff

[REDACTED]

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 Gilbert van Reenen

Full Postal Address

Post Co

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)*

I wish to object to this application in its entirety. The justifications provided are pathetic and indicate that the infrastructure and management regimes and inspection and maintenance procedures are all substandard and way below international best practice. The paucity and quality of microbiological trend data provided is appalling. The application indicates that the competence of the QLDC personnel responsible for the design and maintenance is of a low standard. It appears that no redundancy is built into the system at any point and that the whole system is operating regularly beyond the limits expected. The revelations in the application are so bad that further development and subdivisions should not be permitted in the district until the system can adequately cope with the number of users and adequate backup systems are built to cope with adverse events due to factors such as climate change, power supply failures and earthquake events. The 35 year term applied for the consent is outrageous and signifies that the applicant has no intention of rectifying the faulty and inadequate sewage and storm water system. This is lamentable. The potential human health risks to the general population should consent be given are not adequately addressed in the application. This is also lamentable given the large number of overseas visitors to the region who have a high probability of carrying and transferring a multitude of pathogenic diseases to the aqueous environment such as newly evolving strains of noravirus highly pathogenic debilitating strains of E coli and much more. What is the QLDC thinking when it applies for consent to be allowed to spread these organisms to the general population without any sanction. I intend to expand on various aspects of this submission if I am given an opportunity to speak to it at your hearing.

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 its current form.

Submission No:

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

I seek that the application be declined and that the ORC takes much more of an active role in requiring the QLDC to institute much higher standards (International Best Practice) for its sewage and and stormwater infrastructure and management regime and that compromises be forbidden. I submit that any further development and expansion in the QLDC area cease until adequate stormwater and sewage management & infrastructure systems are established.

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.

Gilbert van Reenen

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

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

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 Graham Ronald Harvey

Full Postal Address: [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)

unacceptable full stop

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).

unacceptable environmental impact
Get Lead

Submission No: _____

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

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 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.

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

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

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 _____ **Guardians Of Lake Dunstan**

Full Postal Address: C/o PO Box 114 Cromwell _____
Post Code: **9310**

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)*

All aspects

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)*.

The Guardians of Lake Dunstan are strongly against this allocation. This will affect many waterways with in our area and is unacceptable

Submission No: _____

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

_____ We expect all aspects of this application to be declined

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, 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 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** 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** served a copy of my submission on the applicant.



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

12.7.19.

(Date)

Submission No: _____

Notes to the submitter

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

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

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

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:

Full Name/s: Guardians of Lake Wanaka; Guardians of Lake Hawea; Upper Clutha Lakes Trust Board

Full Postal Address: Department of Conservation
Wanaka Office

PO Box 93, Wanaka 9343

Wanaka _____

Post Code: 9305

Please provide your preferred contact phone number: _____

Email address: _____

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)*

Please see attached submission

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)*.

Please see attached submission

Submission No: _____

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

Please see attached submission

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 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** (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 July 2019
(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:

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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

Submission close at 5 pm on Friday 12 July 2019

12 July 2019

To: Otago Regional Council

Name of submitters: Don Robertson for Guardians of Lake Wanaka, Guardians of Lake Hawea, Upper Clutha Lakes Trust Board.

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

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.

We are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.

Our Submission relates to all of the application.

Background:

Three local groups with concerns for water quality have jointly prepared this submission – the Guardians of Lake Wanaka, the Guardians of Lake Hawea and the Upper Clutha Lakes Trust Board.

The Guardians of Lake Wanaka are appointed by the Minister of Conservation and requirements under the Lake Wanaka Preservation Act (1973) include a responsibility to maintain or improve quality of water in the lake.

The Guardians of Lake Hawea are a sub-committee of the Hawea Community Association Inc. The Guardians of Lake Hawea aim to ensure that Lake Hawea, its surrounds, its water quality and its biodiversity and ecosystems are maintained, and managed sustainably and safely for the benefit of all.

The Upper Clutha Lakes Trust deed includes the following aim: to work with the Upper Clutha communities, relevant organisations and public agencies to safeguard and where possible enhance the health and water quality of Upper Clutha Lakes and their catchment water sources upstream of the confluence of the Luggate Creek with the Clutha River.

Given the scale and significance of this application we are concerned at the short timeframe available for the public to respond to so much material.

Submission:

Our submission is in opposition to the application for the following reasons.

1. We believe that the QLDC application RM19.051.01 will, if approved as submitted, carry significant risks for water quality with consequent human health risks as well as potential for environmental/ecosystem impacts which would be more than minor. The suggestions we make here will be relevant for the main lakes of the Queenstown Lakes District: Lakes Wakatipu, Wanaka, Hawea and Hayes. Recent events around a major sewage spill into Lake Taupo are a timely reminder of the damage that can occur. Time constraints prevent us from considering the impacts of untreated sewage spillage on streams, rivers or aquifers although impacts are likely to be similar and at times potentially more significant in terms of impact than for spillages into lakes.
2. Application RM19.051.01 states that QLDC is “applying for resource consent from Otago Regional Council (ORC) to discharge untreated wastewater overflows from its network to freshwater receiving environments, or onto land, in circumstances where it may enter freshwater, as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network”. We note that seismic activity and wild fires are omitted from the application.
3. While we accept that there is inevitability for each of these causes of wastewater overflows, an aspirational goal of zero wastewater overflows for subsets of the District networks should be set. Over the last 4 years such events have resulted in a total of around 206 sewage spills from the 421 km QLDC drain network of which ~17 spills are reported to have flowed into water. For some of the more serious of these spills, QLDC has been fined by ORC because QLDC does not have a consent to spill sewage into water. Risks of spills are real. Of 47 pumping stations, ~17 are located in a position to allow sewage to flow into a lake, and of these, 11 are considered to have a “high” or “moderate to high” probability of causing wastewater to enter a lake. We consider this somewhat qualitative level of risk as unacceptable and urge ORC to require QLDC to develop robust solutions to reduce it significantly.
4. The application refers to this district wide consent application to authorise these wastewater overflows as the “Network Consent”. Whether or not this Network Consent is granted there will be spillage over time of untreated sewage / wastewater into freshwater environments across the district.
5. The application seeks a consent to spill for a term of 35 years. We oppose this length of consent and strongly suggest it should be for no more than 10 years and subject to review before being renewed. Ten years provides sufficient time to ensure that QLDC undertakes the proposed upgrades to

infrastructure outlined in its 10 year plan. At the end of the 10 year period ORC should review the steps taken by QLDC to reduce the impact of spills, e.g. by improving processes that prevent/capture overflows.

6. In the ORC consent application form, Part B, Assessments of effects on the environment, two items (v) and (vi) are left blank when they should each have ticked the “yes” boxes.
7. The Beca report glosses over many aspects of risks to water quality in the event of lakes or rivers receiving spillage or overflow of sewage. For example, on page 20 Version 4, the Beca report states: *“In the case of the large lakes, Wakatipu, Wanaka and Hāwea, the low levels of nutrients mean they are anticipated to be sensitive to wastewater discharges. However, these effects are not expected to adversely affect the overall health of the lakes and will be largely restricted to localised effects in the vicinity of the discharge. Following the notification of an overflow, the response process kicks in to remediate the breakage in the network, stop flow of discharge to the receiving environment, and to contain the area. The 2017/2018 median response times were 22 minutes with a key performance indicator of 60 mins and a median resolution time of 151 minutes with a key performance indicator of 240 minutes. Thus reducing the areas of the lakes subject to the overflow discharge and adverse effects.”*
8. It is incorrect of Beca to assert that *“...these effects are not expected to adversely affect the overall health of the lakes and will be largely restricted to localised effects in the vicinity of the discharge.”* To act on this statement will lead to bad decisions with potential for local environmental impact. The impact on a lake shore and nearby water quality and ecosystems will depend on the speed and direction of flow of water and mixing in the vicinity, on the weather conditions and the time taken by QLDC to respond. The quoted QLDC response times are unqualified and we can’t tell whether they include responses to more distant district localities such as Lake Hawea township or Kingston. Realistic target response times should be set for each of the areas likely to be impacted. The risk of contamination during flood events would probably be more significant than that from a breakage, especially if latter occurs well above lake/river level. If a leak site is covered with flood water, then response times are likely to be very protracted which would also put the quoted response times in some doubt for such extreme events.
9. Furthermore, considering *“the overall health of the lakes”* makes no sense in this context because the localised impacts from sewage spillage will coincide with the areas close to townships, which are the most likely to be accessed by people. The characteristics of the entire water bodies, while important in a regional sense, are not the matter at issue in this discussion. Rather, it is the localised impacts at locations where people are likely to have contact with the water and where we may experience localised ecosystem impacts.
10. Regarding the Lake Wanaka Preservation Act 1973, the Beca report claims (pages 28 and 30) that the QLDC consent application *“Through public engagement and proposed conditions, it is considered that the proposal is consistent with the purpose of the Act,”* and further states *“the proposal is*

consistent with the Lake Wanaka Preservation Act in that it will maintain and as far as possible, improve the water quality in the lake through management of overflows.” We disagree with these assertions in the Beca Report. Clearly the dumping of raw sewage into Lake Wanaka is **not** consistent with the requirements of the Lake Wanaka Preservation Act in that dumping raw sewage will certainly not “*maintain and..., improve the water quality in the lake*” as claimed in the Beca report. (The Guardians of Lake Wanaka are appointed by the Minister of Conservation to serve the Lake Wanaka Preservation Act).

11. Another weak but significant assertion by the Beca report relates to the Water Conservation (Kawarau) Order 1997 which includes protection of the water of Lake Wakatipu and the Kawarau river and tributaries. The Beca report states: “*Overall, the way in which wastewater overflows are responded to, as proposed in the suite of consent conditions will provide for both the preservation and protection of the identified water bodies. For this reason it is considered that the application will not be contrary to the purpose of this Order*”. We disagree with this unsubstantiated assertion and expect if granted, sewage spillage or deliberate release into the waters covered by the Water Conservation (Kawarau) Order would be in breach of the Order.
12. Concerning the National Policy Statement for Freshwater Management (NPSFM) the Beca report asserts that: “*the proposal will be consistent with the NPSFM through management of effects to the receiving environment. This is accomplished through the proposed suite of consent conditions and through involvement and engagement with iwi and hapu*”. We disagree with this assertion and do not regard it as credible. A revised version of the NPSFM is due out next year. Any consent conditions relating to NPSFM will need to take into account the new version.
13. The Ryder report (Table 8, page 33) includes a risk assessment associated with potential discharge points from QLDC wastewater infrastructure. In order to help ensure that any response to a spillage or release of sewage into lake water is managed with minimal impact we request that QLDC measure basic water properties in the vicinity of areas where the probability of waste water entering water is High and Moderately High. These measurements should include direction and speed of lake water flow, some index of mixing and background nutrient and E.coli levels under dry conditions and heavy rainfall. Another complexity in assessing hydrodynamics at potential spill localities is the response of local lake water flow to wind speed and direction. We also expect that QLDC would be required in high risk areas to make baseline measures of biodiversity indices (e.g. Macroinvertebrate Community Index, Submerged Plant Index). All such factors would need to be taken into account in minimising localised lake water contamination and determining how long it may take for conditions to return to safe levels for human or stock use and back to physical and biological baseline values. These issues should all be addressed by way of the conditions around any consent to spill.
14. Further, on the topic of public health (Beca report page 21 Version 4), the application states, based on the NIWA report (“Wastewater overflow

discharge consent - Queenstown Lakes District Council Microbial risk assessment" April 2019): *"Currently no data or modelling of dilution, dispersion or advection of discharges exist for freshwater lakes and rivers in the Queenstown Lakes District."* This is a very important statement. It is the reason why the author (Dr Hudson, NIWA) was unable to complete any Quantitative Microbial Risk Assessments. It reinforces our concerns above. It emphasises the need for substantial baseline measurement to address this shortfall in the vicinity of all potential lake and some river/stream spillage sites.

15. On the subject of Public Health, the Beca report concludes that *"With the implementation of the proposed consent conditions including physical response processes, the public health assessment finds the risk to human health from occasional discharge of wastewater to be low to very low. Consequently, the adverse public health effects are considered to be no more than minor"*.
16. The Beca report under-estimates and glosses over the public health advice provided by the NIWA report. We refer for example to the following statements from the NIWA report:
 - *"For lakes, use of a calibrated hydrodynamic model, able to represent the mixing, dilution and advection of contaminants within the lake will be required,"* (page 5, NIWA report).
 - *"These results indicate a potential for significant health risk arising from the discharge of untreated sewage in the conditions assumed in each scenario,"* (page 5, NIWA report).
 - *"We have reviewed the incident response plan of QLDC, and we consider that: 1. It is suitable as a high-level strategy document, but that considerable additional detail should be provided before it can be considered sufficiently robust."* (page 22, NIWA report -our underlining).
 - *"If QLDC implements the recommended response processes identified in Section 6 above then I consider the risk to human health arising from occasional discharge of wastewater from the sewer network to surface waters to be low to very low,"* (page 23, NIWA report)
17. There are several significant points listed in section 6 of the NIWA report that are recommended for inclusion in the QLDC incident response plan. It is not clear from the Beca report that these points will or should be included in an amended incident response plan. Clearly the points in section 6 must be included in the QLDC incident response plan.
18. A further point of concern is that of cumulative environmental effects. One small incident of spillage may be "no more than minor" but the application seeks to legitimise numerous incidents. The receiving environment could conceivably suffer major impact from a series of minor spillage events. The Regional Council should consider the effects of possible discharges in their

entirety, not individually. Therefore we submit that the usual procedure of assessing individual events as minor should not have any place here.

Proposed Draft Conditions

19. Throughout the Beca report there are multiple statements to the effect that if a *“suite of proposed consent conditions are implemented then a range environmental and public health risks will be “less than minor” or “no more than minor”*. We have considered QLDC’s suite of proposed draft conditions (pages 30-36 in the Beca report version 4) and make the following comments:

QLDC Condition Number 1: We agree in principle but it’s not clear if or how the key recommendations from reports listed in a – d will be operationalised by QLDC or revised over time as the infrastructure network expands. This condition requires further explanation to address this.

QLDC Condition Number 2: We agree – and we are pleased to see that this condition excludes wastewater discharges from wastewater treatment plants

QLDC Condition Number 3: We agree.

QLDC Condition Number 4: We agree.

QLDC Condition Number 5: We agree.

QLDC Condition Number 6: We disagree. The consent should be granted for no more than 10 years and should be reviewed before considering a continuation. There would be significant risks in proceeding without review due for example to the considerable uncertainty in QLDC’s response capability across a range of spillage scenarios and uncertainty due to the absence of baseline measurement of key environmental attributes.

QLDC Condition Number 7: We agree. This would be stronger if the proposed review is to be conducted by an independent engineering service familiar with global best practice in wastewater networks and in particular with managing risk in wastewater networks.

QLDC Condition Number 8: We agree. However the response should explicitly include the additions to the QLDC incident response plan proposed in section 6 of the NIWA report.

QLDC Condition Number 9: We agree and will support QLDC’s education and awareness initiatives.

QLDC Condition Number 10: We agree.

Submitters proposed additional new Conditions:

20. The submitters, Guardians of Lake Wanaka, Guardians of Lake Hawea and the Upper Clutha Lakes Trust Board request that the following conditions are added to conditions 1-10 above.

- (a) For each site identified as having a High or Moderately High probability of wastewater entering water the QLDC be required to measure baseline water properties in the vicinity. These measurements should include direction, speed and path or trajectory of lake water flow, some index of mixing and background nutrient and *E.coli* levels under dry conditions and heavy rainfall. An assessment of hydrodynamics at potential spill localities is important and should include response of local lake water flow to wind speed and direction. Baseline measures of invertebrate and submerged plant diversity / species mix should be measured. All such factors would need to be taken into account in minimising localised lake water contamination and determining how long it may take for conditions to return to safe levels for human and stock use. These issues should all be addressed by way of the conditions around any consent to spill to help ensure that any response to a spillage or release of sewage into lake water is managed with minimal impact. A time limit not exceeding 6 months should be set for requiring that these baselines be measured.
- (b) The Beca letter to ORC dated 5 June 2019 advises that a further condition of consent is proposed to require QLDC to prepare one combined procedural document that includes both QLDC's current incident response processes and Dr Hudson's recommendations within 6 months of consent being granted. We agree with this condition and recommend that QLDC's procedural documentation include specific remediation plans for each site identified as having a High or Moderately High probability of wastewater entering water.
- (c) We note that earthquake and wildfire risks are not mentioned in the reports accompanying the consent application. A condition should be added that these be included in the preparation of QLDC's combined procedural document.
- (d) QLDC plans to spend \$105M between 2018 and 2028 on the wastewater network including pump stations, pipes and treatment plants. There should be no relaxation of progress due to consent being granted and we request that QLDC be required to publicly report on a quarterly basis on actual vs planned expenditure over the 10 year period of the consent.
- (e) QLDC should formulate a control/mitigation strategy for each site with appropriate infrastructure being available should an overflow event occur.

Kai Tahu Cultural Values Missing?

- 21. We note that the Beca report states Māori "cultural traditions have been recognised and provided for". This is not explicitly addressed in the Beca report or in the draft proposed conditions. However, on page 25 of the Beca report the following statement is included: *"it is acknowledged that throughout engagement mana whenua indicated their appreciation of the work undertaken thus far and were generally supportive of the management of overflows given they already occur and cannot be fully avoided in the future"*. We believe that Kai Tahu authors of the Cultural Impact Statement should be given an opportunity to endorse our submission.

Decisions sought from the consent authority:

- 22. The submitters seek the following from the consent authority:

- (a) Decline consent or
- (b) Grant with a much reduced term from 35 years to 10 years to ensure the necessary upgrades to infrastructure are undertaken in a timely manner to ensure there is capacity to prevent/capture overflows and
- (c) Grant with a condition to proceed only when a full engineering review has been completed with recommendations for any network changes to achieve global best practice, and those recommendations are scheduled to be implemented and
- (d) Grant with a set of conditions accepting our amendments as indicated to conditions 1 - 10 and our additional submitters conditions a-e above and
- (e) Grant with a set of conditions requiring upgrading and reporting to ORC on set milestones for progressing necessary upgrades and other measures to prevent/capture overflows.

We wish to be heard in support of our submission.

We request that we are kept advised in regard to any reviewing/ reporting/ recommendations resulting from the above.

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

We request pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature on behalf of submitters



Date: 12 July 2019

Electronic address for service of submitter: [REDACTED]

Telephone: [REDACTED]

Postal address: Department of Conservation
Wanaka Office
PO Box 93, Wanaka 9343
Wanaka 9305

Contact person:

Dr Don Robertson

Chair, Guardians of Lake Wanaka

Member, Guardians of Lake Hawea
Trustee, Upper Clutha Lakes Trust Board

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 HARSH KUMAR BANSAL

Full Postal Address: _____

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)

1. "IMPORTANCE" OF LAKE IN QUEENSTOWN TOURISM
2. "PERMANENT DAMAGE TO LAKE'S HABITAT"
3. DEPENDENCE ON LAKE OF BUSINESS (GET BOAT, GET SKI) ETC
4. IT WILL CHANGE ACIDIC PH LEVEL OF WATER FOR GOOD.
5. CAN LEAD TO REGRESSION IF BUSINESSES GETS EFFECTED
6. WEATHER CONDITIONS ALREADY NOT FAVOURABLE
7. PEOPLE WILL NOT SEE THE LAKE IN THE SAME WAY. EVER.

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 very strongly oppose it. FRESH LAKE WATER is driving a lot of business towards Queenstown. This decision is not in the favour of Queenstown, as people will not like going near sewage water. It will bring more health problems which can cost fortune to people.

Submission No: _____

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

I AM SURE THERE WILL BE MORE
ALTERNATIVES. PLZ CHECK INDIAN
GOVERNMENTS CLEAN RIVER GANGA MISSION. THEY
HAVE TO SPEND MILLIONS TO MAKE IT CLEAN
AGAIN AND STILL NOT WORKING. AND IT WAS
DUE TO THE SAME PROBLEM.

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.

Harsh B. Patel
Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)

11/7/2019
(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:

(please print clearly)

Full Name/s Heather Anne Riddell

Full Postal Address: _____

Post Code:

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

Email address: [REDACTED]

I 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*)

Location: Various locations throughout the Queenstown Lakes District

My 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 idea that consent could be granted to discharge wastewater into our lakes and waterways and would like to see alternative solutions looked at

Submission No: _____

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

That the public be informed of any impending discharges and we are
informed of your decision

I: Do Not wish to be heard in support of our/my submission

If others make a similar submission, I 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).

**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.

H A Riddell

12 July 2019

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

(Date)

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.

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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

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

Submission close at 5 pm on Friday 12 July 2019

From: [REDACTED]
To: [Submissions](#)
Cc: alisha.robinson@beca.com
Subject: Submission to ORC. application RM19.051.01
Date: Wednesday, 10 July 2019 8:23:11 p.m.

SUBMISSION TO ORC. APPLICATION TO RM19.051

My name is Hugh Aaron Radford

[REDACTED]

Phone [REDACTED].

I TOTALLY OPPOSE QUEENSTOWN LAKES DISTRICT COUNCIL APPLICATION RM19.051.01 TO DISCHARGE UNTREATED WASTE WATER AND RAW SEWERAGE INTO OUR LAKES AND RIVERS SPECIFICALLY IN THIS DAY AND TECHNOLOGICAL AGE, THIS APPLICATION IS A DISCRACEFULL JOKE AND THIS QLDC. FIASCO HAS BEEN GOING ON FOR MANY YEARS NOW AND NEEDS TO BE CLEANED UP ONCE AND FOR ALL.

IN THE PAST, THE ORC. HAS HISTORICALLY BROUGHT CHARGES AGAINST THE PUBLIC FOR FAR LESS MINOR WATER POLLUTION OFFENCES THAN THIS APPLICATION SO THEREFORE SETS A PRECEDENT.

I AM DIRECTLY AFFECTED BY THIS APPLICATION AS A PRIVATE CITIZEN AS IT GOES AGAINST ALL MODERN ENVIRONMENTAL PRACTICES AND THE FACT THAT I USE THE KAWARAU RIVER FOR RECREATIONAL PURPOSES AND I DO NOT WANT TO DO THIS IN QUEENSTOWN WASTE.

THE DECISION I EXPECT FROM THE CONSENT AUTHORITY IS ABSOLUTE **NO** TO THIS APPLICATION.

I AM NOT A TRADE COMPETITOR OF THE APPLICANT, I DO NOT WISH TO BE HEARD AT THE HEARING AS I HAVE STATED MY VIEWS EXPLICITLY IN THIS SUBMISSION. I DO NOT WISH TO BE INVOLVED IN ANY PREHEARING AS I WILL NOT CHANGE MY MIND AND AGREE TO SEWERAGE BEING DUMPED INTO OUR LOCAL WATERWAY BY AN INEPT COUNCIL WHO CANT GET THEIR STUFF TOGETHER.

CC Alisha.robinson@beca.com

YOURS SINCERELY
H A RADFORD

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 Hunter John LEECE, Anne Margaret KOBLENIA

Full Postal Address:

Post Code:

Please provide your preferred contact phone number:

Email address:

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

0000 53

(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)*

AEE 1.5 - Duration 35 years

AEE 5.4 - Responses and Network improvements

Proposed Draft Conditions - 7.9 Ongoing Community Awareness

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 specifically because the problems have been known about for a considerable period and retaining the fall back of discharging to natural water bodies for an extended period (possibly the rest of our lifetimes) is letting the council escape the appropriate penalties for failure to exercise their responsibilities and is unacceptable.

Reviewing the appendix detailing spillages shows that the majority were preventable if monitoring, maintenance, enforcement and education were effective.

As a user of lake Wakatipu we eat the fish that we catch and the closing areas of the lake due to preventable causes is unacceptable.

QLDC must take greater steps more quickly to prevent these discharges through better monitoring, better maintenance, better enforcement and better education.

Submission No:

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

The consent period should be reduced to a maximum of 5 years.

Conditions of any consent must include requirements for each instance of discharge be reviewed by ORC to establish that QLDC have done everything to avoid the discharge. For example if restaurants are seen to be a high risk source of fat blockages the monitoring of fat traps needs to be increased dramatically and only reduced on proven compliance, root blockages would indicate a lack of regular inspection to identify the problems.

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, (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 Have served a copy of my submission on the applicant.


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

10 July 2019

(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 Ian S. Ross

Full Postal Address [REDACTED]
[REDACTED]
Post Co [REDACTED]

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)*

The QLDC's right to discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district.

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 its entirety because it is a fundamental of planned settlement and habitation that you don't foul your water or food sources with your own waste. Weather events and normal usage issues exacerbate an existing capacity exceedance. There needs to be an immediate moratorium on residential and visitor accommodation development that will require the use of the current effluent management system until it is capable of coping with present and projected population levels.

Submission No:

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

Refuse consent 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 and institute an immediate moratorium on residential and visitor accommodation development that will require the use of the current effluent management system until it is

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:

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b) does not relate to trade competition or the effects of trade competition.

I, (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 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 July 2019

(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

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

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 Indira and Michael Neuendorff

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)*

No discharge of untreated wastewater into freshwater should be permitted at all times

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).

Council should get their priorities right in the first place, no excuses for not taking actions to prevent discharge of untreated water

Submission No:

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

No discharge of untreated water into fresh water at all times, no exemptions

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.



Indira
Neuendorff

Digitally signed by Indira
Neuendorff
Date: 2019.07.12
16:25:13 +12'00'

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

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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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Otago Regional Council, Private Bag 1954, Dunedin, 9054
or by email to 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

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 Indira and Michael Neuendorff

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)*

No discharge of untreated wastewater into freshwater should be permitted at all times

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).

Council should get their priorities right in the first place, no excuses for not taking actions to prevent discharge of untreated water

Submission No:

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

No discharge of untreated water into fresh water at all times, no exemptions

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.



Indira
Neuendorff

Digitally signed by Indira
Neuendorff
Date: 2019.07.12
16:25:13 +12'00'

12-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](#).

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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.

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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):

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- 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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or by email to 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

Karen Bagnall

From: Isabel [REDACTED]
Sent: Friday, 12 July 2019 2:20 p.m.
To: Submissions; alisha.robinson@beca.com
Subject: Fwd: Wastewater discharge into public waterways

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.

Isabel Bongers
[REDACTED]

----- Forwarded Message -----

Subject:Wastewater discharge into public waterways
Date:Fri, 12 Jul 2019 14:15:41 +1200
From:Isabel [REDACTED]
To:submissions@orc.govt.nz, alisha.robinson@beca.com

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

Applicant Details: Isabel Bongers

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:

Full Name/s: Primary contact: Isabel Bongers

Full Postal Address: [REDACTED]

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 organizations 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 recognizing 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 Maori.

To aid further understanding, a breakdown of the word Maori 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 epitomized in 'I think therefore I am', the Māori 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!

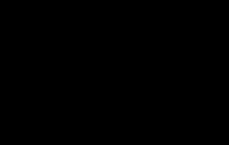
More stringent conditions are put in place in regards to households and industry discharge, including investment in more stringent monitoring of household and trade waste bylaw.

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



--

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 JADE GIBSON

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)

please see points below - this is unhealthy.

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 as fresh water should
remain as fresh as possible for sanitary
reasons. We should not knowingly pollute it!

Submission No: _____

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

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)

11/7/19

(Date)

Submission No:_____

Notes to the submitter

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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

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

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 James Dicey

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)*

The proposal in its entirety

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)*.

1. The proposal will give no financial incentive to the QLDC to rapidly upgrade their infrastructure. Keeping the current penal regime act as an incentive.
2. The water monitoring will not improve with the proposal meaning the public will be unable to understand the severity of the events.
3. The level of public notification will not sufficiently improve meaning the public will not be better informed than they currently are and be able to react in an appropriate manner.
4. A review of the recent events supplied by the QLDC indicates a manageable number of sites that cause the majority of events that result in discharge to water. A targeted infrastructure development program ratec above the current targets would allow these to be rapidly addressed.

Submission No:

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

Reject the application in whole.

If the application is not rejected as a whole:

- 1) Increase the level of water testing proposed
- 2) Create an enhanced and transparent reporting system
- 3) Where the cause of the discharge can be traced back to a particular party they need to pay for the upgrade and/or face a financial penalty
- 4) Create a fast tracked investment plan to address critical failure points which are most often the cause of discharge to water as well as failure points where the failure occurs less often but the volume of untreated water is high

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)

2 July 2019

(Date)

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):

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- 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:
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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

Karen Bagnall

From: James Dicey <[REDACTED]>
Sent: Wednesday, 3 July 2019 1:37 a.m.
To: Karen Bagnall
Subject: Re: FW: RM19.051.01 Submission
Attachments: James Dicey Submission.pdf

Hi karen,

I have tried again - its the electronically editable form and looks like its complete on my side?

I have also saved it in a slightly different version. Some of the text is not printing so I have reproduced below

1. The proposal will give no financial incentive to the QLDC to rapidly upgrade their infrastructure. Keeping the current penal regime act as an incentive.
2. The water monitoring will not improve with the proposal meaning the public will be unable to understand the severity of the events.
3. The level of public notification will not sufficiently improve meaning the public will not be better informed than they currently are and be able to react in an appropriate manner.
4. A review of the recent events supplied by the QLDC indicates a manageable number of sites that cause the majority of events that result in discharge to water. A targeted infrastructure development program rated above the current targets would allow these to be rapidly addressed.
5. The overflow has the potential to affect downstream water users who use the water for either irrigation of fresh crops (e.g., pipfruit/stonefruit) potentially causing a perception of risk, as well as potentially tainting drinking water where potable water is being sourced from the Kowarau Arm of Lake Dunstan.
6. The time period for upgrade of the infrastructure is unacceptably long
7. The way the proposal is drafted allows the QLDC to potentially use this as a coverall for a wider range of events, specifically infrastructure failures caused by future population growth
8. It is manifestly unfair that the ratepayers of another territorial authority should bear potential harm from the QLDC not properly planning and investing in its infrastructure.
9. It fundamentally goes against the ORC operative Water Plan substance and intent and is a gross abuse of the RMA approach in that it fundamentally goes against Part 2 of the Act.

Reject the application in whole.

If the application is not rejected as a whole:

- 1) Increase the level of water testing proposed
- 2) Create an enhanced and transparent reporting system
- 3) Where the cause of the discharge can be traced back to a particular party they need to pay for the upgrade and/or face a financial penalty
- 4) Create a fast tracked investment plan to address critical failure points which are most often the cause of discharge to water as well as failure points where the failure occurs less often but the volume of untreated water is high
- 5) Put in place a strong financial penalty regime that properly incentivise the QLDC to act rapidly, including an independently run audit process which is regularly reported on to the public
- 6) Ensure the events "allowed" under the consent are very tightly defined to ensure there is no scope creep
- 7) Recompose the CODC for any financial burden this consent could have on the CODC ratepayers, particularly any people taking water from the Kowarau Arm, and audit any current takes and install sufficient and appropriate water treatment solutions to ensure irrigation and potable water meets and exceeds minimum drinking water standards.

Cheers,
James

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 _James Michael Bohm (Jim)

Full Postal Address: _____

Post Code: _____

Please provide your preferred contact phone number: _____

Email address: _____

I/ we wish to submit a **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)*

Section 1.2 Philosophy for the Network Consent

Proposed Draft Conditions

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 am neutral about the application in general. While I accept that a consent of this kind is required for the reasons of protection of public health as stated in the application, and accept the idea that a philosophy should underpin the consent, I find the application deficient in a way that clearly risks more overflows in the future. The application states that the behaviour of people putting things into drains that they should not is one of the main causes of blockages leading to overflows onto land and into waterways and of waterway pollution. However the philosophy makes no mention that effective measures to change such behavior will be required, to eliminate this major cause of overflows. The main body of the application fails to outline suitable details of what approaches it plans to

Submission No: _____

use in future to change this behaviour. QLDC does, however give us a clue in its woeful performance in communicating with “the community” in the very low numbers of people who turned up to QLDC’s “community consultation” for preparing this consent application in November 2018. QLDC has shown itself to lack the competencies it needed to succeed in its consultation with the community on this matter. To “consult”, QLDC needed people to participate. To achieve this, QLDC needed to be capable of attracting people to participate in the consultation. The consultation failed in this respect almost completely. In future efforts to research community attitudes and opinions on this topic area and also to change undesirable behaviours by community members, QLDC should be required to invest in appropriate, reputable expertise as well as in serious research into world best practice in this field of behaviour change. QLDC needs to find out what approaches to this problem have proven to work in other jurisdictions in New Zealand in the rest of the world. QLDC’s problem with overflows from blockages caused by wet-wipes, hygiene products fat and building debris cannot be unique in the world and at least some jurisdictions will have succeeded to some degree. QLDC needs to find out. It then needs to use such proven experience to devise effective approaches to bring about the needed behaviour changes here. QLDC bears the responsibility of preserving the purity of our region’s fresh water and the health of our community. Behaviour change is a large part of what QLDC needs to achieve to bring this about. Peoples’ behaviour is the big obstacle to achieving this and QLDC needs to accept it has to be successful in changing behaviour if it is to do this job successfully. The tired approaches that failed so spectacularly recently must not be repeated.

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

The consent authority should insert a condition in section 9 in the consent that requires QLDC to develop and implement strategies that are effective in changing the behaviour of community members whose actions block drains causing overflows into waterways and cause other forms of water pollution. This requirement should include using reputable, proven professional expertise in successfully bringing about change in undesirable community behaviours. QLDC should be required under the consent to appoint experts who are suitably professionally qualified and experienced and who have been successful in effecting behaviour change in communities elsewhere. These experts should advise on and oversee the design, development and execution of the behaviour change strategies that QLDC implements under this condition. The strategies should be informed by appropriate research into what has succeeded elsewhere in the world in comparable circumstances, and must not be held back by failed approaches that QLDC has used the past.

This condition should also require a carefully designed monitoring and evaluation process that is reported on annually and is included in the review process.

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. Yes

Submission No: _____

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. N/A*

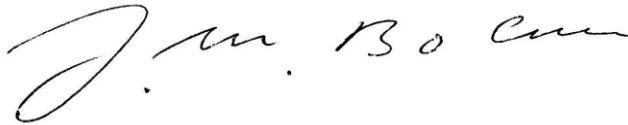
I, **am/am not** (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- 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)

12 July 2019

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.

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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:
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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

Submission close at 5 pm on Friday 12 July 2019

Submission No:

05 JUL 2019

QUEENSTOWN

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 Laura and Jan Solbak

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** (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)*

The ability for QLDC to discharge intermittent raw sewage overflows at Bullock Creek, Eely Point, Glendhu Bay, Clutha River, Luggate Creek and Lake Hawea.

Consent duration of 35 years

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 by QLDC.

QLDC stating that the consent is 'to formalise the current situation' is not acceptable. The impact of this consent is grossly understated. As eminent water scientist Dr Don Roberston points out, it is a 'licence to pollute'.

Currently QLDC does not have major holding tanks at emergency discharge areas. Why not?

Allowing the resource consent is not fixing the overflow problem, it is allowing QLDC to 'normalise the discharge' to quote QLDC personnel.. This is giving permission for the overflow to degrade freshwater bodies.⁵

Submission No:

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

1 To turn down the application from QLDC to ORC in its entirety

2 If the application is approved by ORC, there needs to be stringent conditions set around the consent with evidence based data regularly collected re the impact on freshwater bodies. The requested duration of 35 years is far too long

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 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 (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)

5th LGS
10-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 Jane Guy

Full Postal Address: [REDACTED]

Post Code: [REDACTED]

Please provide your preferred contact phone number:

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)*

My submission is: 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:

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)*.

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.

Page 1 of 3

Submission No:

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

I seek the following decision from the consent authority: 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 **am/am** Not

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

I **do/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** Have Not

not served a copy of my submission on the applicant.

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

Page 2 of 3

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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Or by email to alisha.robinson@beca.com