

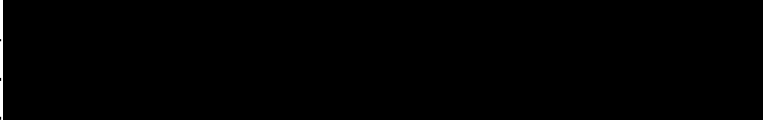
Submission No:

**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 _____

Full Postal Address: 

Please provide your preferred contact phone number: 

Email address: 

I/ we wish to submit a **SUPPORT / OPPOSE / NEUTRAL** (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/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).

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

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

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

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

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

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

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

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

(Date)

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

From: [REDACTED]
To: [Karen Bagnall](mailto:karen.bagnall@orc.govt.nz)
Subject: Re: Queenstown Lakes District Council - Publicly Notified Application RM19.051
Date: Wednesday, 17 July 2019 4:03:57 p.m.

Hi Karen,
I did answer on the form so don't know what happened.

We wish to be heard in support of our submission
Similar submission we will consider presenting a joint case. Yes
We are not a trade competitor
We do want to be involved in any pre-hearing
We do request that the local authority delegates its functions.
We have served a copy of our submission on the applicants.
Thanks
Patsy & Barry Johnston

On 17/07/2019, at 12:24 PM, Karen Bagnall <karen.bagnall@orc.govt.nz> wrote:

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.*

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

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

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

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

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

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

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

Regards

<image003.png>

Karen Bagnall

SENIOR CONSENTS SUPPORT OFFICER

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

karen.bagnall@orc.govt.nz
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

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 Paul + Robyn Hellebrekers

Full Postal Address: _____

Post Code: _____

Work Ph: _____

Home Ph: _____

Mobile Ph: _____

Email address: _____

(please tick your preferred Daytime contact number)

Signature/s of submitter/s

26/6/2019
(Date)

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

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)*

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

See attached sheet.

Submission No: _____

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

See attached notes

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

I would like to seek that this application to be **DECLINED** by Otago Regional Council.

Lake Wakatipu and Lake Wanaka are microtrophic which indicates a very high water quality. This makes the lakes very sensitive to even minor changes in nutrient concentrations. Given the extremely low nutrient concentrations in the lakes, even seemingly small individual discharges may contribute significant nutrient loads to these systems and may contribute to eutrophication, at least locally.

QLDC's application to allow untreated wastewater to be discharged into freshwater environments represents a significant environmental, public health and socio-economic risk, e.g. think of the impact on tourism alone if Lake Wakatipu or Lake Wanaka become contaminated with untreated wastewater.

QLDC should find alternative solutions to maintain and / or improve the wastewater infrastructure to minimise the risks of untreated discharge contaminating the region's fragile freshwater environments.

Karen Bagnall

From: Paul Hellebrekers <[REDACTED]>
Sent: Wednesday, 3 July 2019 6:08 p.m.
To: Karen Bagnall; [REDACTED]
Subject: RE: Notified Application by Queenstown Lakes District Council RM19.051

Hi Karen

I've highlighted my responses below – is that good enough?

Thanks

Tess

From: Karen Bagnall <karen.bagnall@orc.govt.nz>
Sent: Thursday, 27 June 2019 2:29 PM
To: [REDACTED]
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

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 Peter Hamilton

Full Postal Address: [REDACTED]

Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

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

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

Application Number: **RM19.051.01**

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

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

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

The discharge of untreated waste water into various fresh water receiving environments.

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

I 100% oppose the consent to discharge waste water into the lakes districts fresh water environments. Allowing this consent to be approved sets a dangerous precedent and removes all pressure for the council to make improvements to the waste water system to prevent future spills. The lakes districts and New Zealand on a whole relies heavily upon a clean and well maintained environment. Big businesses, agricultural and individuals of the public would not be allowed to and neither should the council.

Submission No:

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

We seek for the consent to be denied and for improvements and upgrades to be conducted as soon as possible to prevent future spills into water ways and fresh water environments.

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



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

11/07/19

(Date)

Submission No:

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

From: [REDACTED]
To: [Karen Bagnall](#)
Subject: Re: Submission on consent application RM19.051
Date: Thursday, 11 July 2019 7:51:22 p.m.

Answered below.

Thank you

Sent from my iPhone

> On 11/07/2019, at 3:54 AM, Karen Bagnall <karen.bagnall@orc.govt.nz> wrote:

>

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

>

> I/ we wish to submit a SUPPORT / OPPOSE / NEUTRAL (choose one) submission

> on the application

Oppose

>

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

Am not

>

> *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.

Leave blank

>

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

I do

>

> 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 do

>

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

I have

>

>

> 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.

>

> 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

>
>
>
>
>
>

> -----Original Message-----

> From: Peter Hamilton [REDACTED]
> Sent: Thursday, 11 July 2019 10:38 a.m.
> To: Submissions <Submissions@orc.govt.nz>; alisha.robinson@beca.com
> Subject: Submission on consent application RM19.051

>
>
>

> Any questions please don't hesitate to get in touch.

>
> Thank you
> -Peter Hamilton

>
>

> Sent from my iPhone
> <Editable -submission-form-for-publicly-notified-application-rm19051.pdf>

Submission No: _____

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

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

Submitter Details:

(please print clearly)

Full Name/s Peter Thomson

Full Postal Address: [Redacted]

Post Code: [Redacted]

Please provide your preferred contact phone number: [Redacted]

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)*

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).*

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.

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

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

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

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

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

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

The address for service for the Consent Authority is:

Otago Regional Council, Private Bag 1954, Dunedin, 9054
or by email to submissions@orc.govt.nz

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

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

Submitter: Phillipa Byers, [REDACTED].

I wish to submit an oppose submission on the application of:

Applicant's Name: Queenstown Lakes District Council

Application Number: RM19.051.01

Location: Various locations throughout the Queenstown Lakes district

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

The specific parts of the application that my submission relates to is the discharge of untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater.

My submission is to oppose the application because under section 15 of the RMA no person may discharge any— (a) contaminant or water into water; or (b) contaminant onto or into land in circumstances which may result in that contaminant (or any other contaminant emanating as a result of natural processes from that contaminant) entering water.

The main source of pathogens in fresh water are human sewage and animal manure (Dr Jan Wright, 2012, <https://www.pce.parliament.nz/media/1278/pce-water-quality-in-new-zealand.pdf>). Our lakes and rivers should be preserved and people should be able to enjoy them without risk of infection "Many of the faecal coliform bacteria in human waste are harmless. However, there are disease organisms – or 'pathogens' – that can cause harm. These can be bacteria such as typhoid, or viruses such as hepatitis B. Direct contact with these pathogens or pollution of the water supply can cause infections" (<https://www.mfe.govt.nz/publications/waste/sustainable-wastewater-management-handbook-smaller-communities-part-1-0>).

"The potential for pathogens in water to make people sick should not be underestimated. In 1984, when a sewer overflowed close to the water supply intake in Queenstown, 3,500 people came down with gastroenteritis and most of the town's pupils were absent from school."

(<https://www.pce.parliament.nz/media/1278/pce-water-quality-in-new-zealand.pdf>). Discharge due to blockages is not recent and the consequences not always obvious. Should the discharges become more frequent recreational use of the waterways may be affected "relatively high concentrations can also make an area unsafe for swimming and `water contact recreation`"

(<https://www.mfe.govt.nz/publications/waste/sustainable-wastewater-management-handbook-smaller-communities-part-1-0>).

While a network rebuild is expensive, discharges of untreated waste water into our waterways will continue until a rebuild or other option is complete. That should be the focus. Our environment, waterways, and people should be protected and put before the `easy` option of gaining permission to avoid solving the problem.

I seek the following decision from the consent authority: To deny a resource 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.

I do not wish to be heard in support of my submission but if others make a similar submission, I will consider presenting a joint case with them at a hearing.

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

I am 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.

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

Phillipa Byers

11 July, 2019

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Submission No:

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

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

I/we:

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

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

- Yes
- No

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

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

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

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

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

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

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



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20-%20fc8878d4%20-%
2000675b84
Date: 2018.07.01 18:04:42 +1200

01-Jul-19

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

(Date)

Submission No:

Notes to the submitter

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

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

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

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

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

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

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

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

The address for service for the Consent Authority is:

Otago Regional Council, Private Bag 1954, Dunedin, 9054
or by email to submissions@orc.govt.nz

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:

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

Alternative wastewater policy needed.

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.



Prue Wilson

Digitally signed by Prue
Wilson
Date: 2019.07.12
16:20:44 +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](#).

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.

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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

From: [REDACTED]
To: alisha.robinson@beca.com; [Submissions](#)
Subject: Application No: RM19.051.01 Consent Type: Discharge Permit
Date: Thursday, 11 July 2019 4:06:53 p.m.

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

Applicant Details: rachael bentley

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:

Rachael Bentley: [REDACTED]

Mobile Ph: [REDACTED]

Email address: [REDACTED]

Signature/s of submitter:  RJB

Submission No:

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

Do you: Oppose Yes

Do you: Wish to be heard Yes

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

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

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

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

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

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

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

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

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

The reasons for this submission are:

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

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

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

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

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

Protecting the mauri of our waterways. Mauri is the life energy which binds and animates all things in the physical world. It is the force behind that which is manifested, the force that sparkles alive the waterways, the force of beat in the human pulse, the force that shines out through the native greenery. Discharging untreated water into waterways will diminish and degrade mauri.

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

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

Uri = Descendants. All things, seen and unseen

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

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

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

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

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

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

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

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

Submission No:

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

--

Rachael Bentley Dip OT, NZROT,
Occupational Therapist
Assoc member ASA

p
m

Provider of non-respiratory sleep disorder assessment and intervention

Disclaimer: This message is for the named person's use only and may contain confidential information. No confidentiality or privilege is waived or lost by any transmission. If you receive this information/message in error, please immediately delete or destroy it and all copies of it from your system and notify the sender immediately. You must not directly or indirectly use, disclose, distribute, print or copy any part of this message if you are not the intended recipient. The sleep solutions clinic is not responsible for any changes made to this message and / or any attachments after being sent by sleep solutions

From: [REDACTED]
To: [Karen Bagnall](#)
Subject: Re: Application No: RM19.051.01 Consent Type: Discharge Permit
Date: Friday, 12 July 2019 12:02:19 p.m.
Attachments: [image001.png](#)

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:

adversely affects the environment; and
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 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.

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.

cid:image004.png@01D256BB.1597AAE0

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

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From: Rachael Bentley [REDACTED]
Sent: Thursday, 11 July 2019 4:07 p.m.
To: alisha.robinson@beca.com; Submissions <Submissions@orc.govt.nz>
Subject: Application No: RM19.051.01 Consent Type: Discharge Permit

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

Applicant Details: rachael bentley

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:

Rachael Bentley: [REDACTED]

Mobile Ph: [REDACTED]

Email address: [REDACTED]

Signature/s of submitter:RJB

On Fri, Jul 12, 2019 at 11:16 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
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From: Rachael Bentley [REDACTED] >
Sent: Thursday, 11 July 2019 4:07 p.m.
To: alisha.robinson@beca.com; Submissions <Submissions@orc.govt.nz>
Subject: Application No: RM19.051.01 Consent Type: Discharge Permit

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

Applicant Details: rachael bentley

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:

Rachael Bentley: [REDACTED]

[REDACTED]

Mobile Ph: [REDACTED]

Email address: [REDACTED]

Signature/s of submitter:RJB

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.

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

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

The reasons for this submission are:

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

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

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

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

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

Protecting the mauri of our waterways. Mauri is the life energy which binds and animates all things in the physical world. It is the force behind that which is manifested, the force that sparkles alive the waterways, the force of beat in the human pulse, the force that shines out through the native greenery. Discharging untreated water into waterways will diminish and degrade mauri.

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

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

Uri = Descendants. All things, seen and unseen

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

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

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

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

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

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

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

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

Submission No:

I seek the following decision from the consent authority: that the consent not be allowed in

its entirety due to the reasons above

--

Rachael Bentley Dip OT, NZROT,

Occupational Therapist

Assoc member ASA

p [REDACTED]

[REDACTED]

[REDACTED]

Provider of non-respiratory sleep disorder assessment and intervention

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--

Rachael Bentley Dip OT, NZROT,

Occupational Therapist

Assoc member ASA

p [REDACTED]

[REDACTED]

Provider of non-respiratory sleep disorder assessment and intervention

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From: [REDACTED]
To: [Submissions](#)
Subject: Application No: RM19.051.01
Date: Thursday, 11 July 2019 2:52:42 p.m.

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:

Full Name/s: Raewyn Calhaem

Full Postal Address: [REDACTED]

Mobile Ph: [REDACTED]

Email address: [REDACTED]

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

Do you: Oppose Yes

Do you: Wish to be heard No

The specific parts of the application/s that this submission relates to are: that the consent be conditional on a detail action plan being provided by QLDC to reduce and eventually remove this issue from occurring and that the consent period be reduced to allow for progress monitoring on the action plan.

The reasons for this submission are:

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

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

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

“The applicant, QLDC, has failed to demonstrate how ORC can possibly grant the consent sought whilst ensuring that ORC’s statutory obligations under the NPSFM are satisfied at all times”. Both ORC and QLDC, under section 6 (e), 7 (a) and 8 RMA, are responsible for recognising and providing for, having particular regard to, and taking into account both the principles of the Treaty of Waitangi and matters of importance to iwi. These values include but are not limited to:

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.

I seek the following decision from the consent authority: that the consent be made conditional due to the reasons above

From: [REDACTED]
To: [Karen Bagnall](mailto:karen.bagnall@orc.govt.nz)
Subject: Re: Application No: RM19.051.01
Date: Friday, 12 July 2019 1:15:17 p.m.
Attachments: [image001.png](#)

Thanks for following up
Answer is NOT to all these questions

Sent from my iPhone

On 12/07/2019, at 10:33 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.

<[image001.png](#)>

Karen Bagnall

SENIOR CONSENTS SUPPORT OFFICER

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

karen.bagnall@orc.govt.nz
www.orc.govt.nz

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From: Raewyn Calhaem <[REDACTED]>

Sent: Thursday, 11 July 2019 2:53 p.m.

To: Submissions <Submissions@orc.govt.nz>

Subject: Application No: RM19.051.01

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:

Full Name/s: Raewyn Calhaem

Full Postal Address: [REDACTED]

Mobile Ph: [REDACTED]

Email address: [REDACTED]

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

Do you: Oppose Yes

Do you: Wish to be heard No

The specific parts of the application/s that this submission relates to are: that the consent be conditional on a detail action plan being provided by QLDC to reduce and eventually remove this issue from occurring and that the consent period be reduced to allow for progress monitoring on the action plan.

The reasons for this submission are:

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

ORC is responsible for safe guarding the health of people who come into contact with the

water (NPSFM).

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

“The applicant, QLDC, has failed to demonstrate how ORC can possibly grant the consent sought whilst ensuring that ORC’s statutory obligations under the NPSFM are satisfied at all times”. Both ORC and QLDC, under section 6 (e), 7 (a) and 8 RMA, are responsible for recognising and providing for, having particular regard to, and taking into account both the principles of the Treaty of Waitangi and matters of importance to iwi. These values include but are not limited to:

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.

I seek the following decision from the consent authority: that the consent be made conditional due to the reasons above

Submission No: _____

Page 1 of 3

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 Rainsford John GRUBB

Full Postal Address:

[REDACTED]

Post Code: [REDACTED]

☎ Work Ph: [REDACTED]

☎ Home Ph: [REDACTED]

☎ Mobile Ph: [REDACTED]

☎ Email address: [REDACTED]

(please tick your preferred Daytime contact number)

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

Submission No: _____

Page 2 of 3

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 wastewater to receiving natural water bodies such as Lake, Rivers and streams

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

I consider QLDC has not made adequate provision for prevention or mitigation of the discharges envisaged in the proposals.

My submission is the the QLDC must be required to install emergency discharge holding tanks at a point prior to discharge to the receiving water body. Such tanks must be equivalent to the historical or reasonably anticipated potential discharge prior to the alarm being raised and the discharge stopped. In the latter case the potential discharge size can be reasonably calculated by qualified Engineers.

Where the discharge potential is too large to make holding tanks practical then the system needs to be re-designed to reduce the potential and make tanks practicable

As background the water quality in much of the QLDC area is very high, but often the Lakes are vulnerable to eutrophication through addition of nutrients. Where there is potential to avoid discharge of nutrients into such a high quality environment every possible effort should be made.

The QLDC should be required to make available to submitters its record of the number and approximate sizes of discharges of this nature over the last 10 years.

There is ample precedent. As a resident at karitane where I had to pump sewage to the main system, I was required to install a holding tank for use in the event of pump or power failure. If an individual is required to do that then there is no reason to exempt a Local Body.

The question of cost will no doubt be raised.

My submission is that (plastic) tanks are cheap and installing them is a simple process, Whether it be one 25,000 litre tank, a cluster of inter-connected tank, or a huge tank, the cost is likely to be minimal compared to the deleterious effect on the Lakes rivers and streams in the area.

Obviously one of the keys to this proposal is the alarm and response time to shutting off the discharge. As part of any consent QLDC should be required to satisfy the ORC that its systems are such that the holding tanks capacity may not be exceeded while allowing for extreme emergencies.

Where Holding tanks may, after proper Engineering analysis, be deemed impractical, then the QLDC must be required to satisfy ORC that;

- 1. Its engineering to avoid discharges is of an exceptionally high level, higher than one would expect in other environments*
- 2. Its emergency response to shutting off the discharges is very fast*
- 3. Its ability to shut of the discharges is not compromised by such as power failures or able to be anticipated other issues*

R J Grubb

Submission No: _____

Page 3 of 3

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

See above

- *Provision of holding tanks*
- *Requiring excellent response times and ability to avoid shut off issues*

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](#)
Subject: Fwd: Notified Application by Queenstown Lakes District Council RM19.051
Date: Friday, 21 June 2019 12:00:42 p.m.
Attachments: [image002.png](#)

Please see the answers to your 2 questions below. Please confirm that my submission is correct in all respects, will be considered, and i will be invited to be heard

R J Grubb 21/6/19

Rainsford (Ray) Grubb
15 Jessies Crescent, Wanaka 9305

021 1335570

Email; [REDACTED]

Skype; [REDACTED]

Facetime; [REDACTED]

www.landrover90silkroad.wordpress.com/

----- Forwarded message -----

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

Date: Fri, Jun 21, 2019 at 9:18 AM

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

To:

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 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 NO (tick one)

R J GRUBB

21 JUNE 2019

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

SENIOR CONSENTS SUPPORT OFFICER

Otago Regional Council

70 Stafford St
Private Bag 1954 Dunedin 9054

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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 Ralph Hume

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)*
Application to discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in circumstances where it may enter water as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district.

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've been brought up on a farm. The expense & effort that industry is putting in to clean up its 150 years of polluting nearby water ways & aquifer is significant. A lot of this effort is as a result of having to comply with RMA & Council requirements. Consequently I find this application nonsensical & lying in the face of current public opinion which is attempting to keep "NZ Green". Individual industries would be prosecuted for doing what the council wants by the very council that is making this application.
In making this application it is clear that the applicant's have no ecological or social conscience instead are just looking for the easiest & cheap way out. Instead of getting the public's "buy in" to the applicant before it was submitted the QLDC's Chief Engineer belatedly comes out with a story that the application is a technical requirement, under the Resource Management Act, to achieve a number of goals which include - who is responsible for waste water, make it easier to prosecute developers, prompt an education campaign about what goes into waste water systems & put a legal framework over something that is always going to happen. It seems absurd that a consent has to be applied for & approved although untreated waste water is to be discharged into our lakes, rivers & land for 35 years to circulate a process that is clearly not fit for purpose.
If this application is approved can I trust QLDC, both elected & no elected members, to discharge this application with ecological & social responsibility? Not on the slightest. In making this application it clearly demonstrates QLDC's lack of environmental concern and care.
As the Chief Engineer has said, they were aware there would be some public backlash but were not prepared for the extent of this public opinion. Every consenting trust to CRUX. This negative public opinion needs to be clearly stated by the panel as it is real, finally recognised by the applicant & advisers. QLDC must be reassuring voters that the people of Queenstown & Lakes District are looking back at being bulldozed into things the community doesn't want. QLDC would not have made this application if they had first consulted deliberately with the community.
A more acceptable solution to this application is:
(a) Fix the broken process that requires ridiculous circumstances to make the process work.
(b) Educate people about what can and can't go into waste water systems.
(c) Fix the waste water system so that it copes. If necessary make holding tanks to contain overflows. Root, foreign objects & fat cause the bulk of overflows. These three items caused 65% of overflows to water & 43% of all overflows to both ground & water. Seems to me the solution here is to take a more proactive approach to waste water pipe maintenance. The use of in pipe CCTV inspection needs to be introduced stepped up & not extended to eliminate the main problem that causes overflows.

Submission No:

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

Do the right thing here People. Decline this 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 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-Jul-19

(Date)

Queenstown Lakes District Council

- RM19.051

Application to discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in circumstances where it may enter water as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district.

I've been brought up on a farm. The expense & effort that industry is putting in to clean up its 150 years of polluting nearby water ways & aquafer is significant. A lot of this effort is as a result of having to comply with RMA & Council requirements. Consequently I find this application nonsensical & flying in the face of current public opinion which is attempting to keep "NZ Green". Individual Industries would be prosecuted for doing what the council wants by the very council that is making this application.

In making this application it is clear that the applicants have no ecological or social conscience instead are just looking for the expedient & cheap way out.

Instead of getting the public's buy in to the application before it was submitted the QLDC'S Chief Engineer belatedly comes out with a story that this application is a technical requirement, under the Resource Management Act, to achieve a number of goals which include - who is responsible for waste water, make it easier to prosecute developers, prompt an education campaign about what goes

into waste water systems & put a legal framework over something that is always going to happen. It seems absurd that a consent has to be applied for & approved allowing untreated waste water to be discharged into our lakes, rivers & land for 35 years to circumnavigate a process that is clearly not fit for purpose.

If this application is approved can I trust QLDC, both elected & no elected members, to discharge this application both ecologically & socially responsibly? Not in the slightest. In making this application it clearly demonstrates QLDC's lack of environmental concern and care.

As the Chief Engineer has said, they were aware there would be some public backlash but were not prepared for the extent of that public opinion. Fancy admitting that to CRUX. This negative public opinion needs to be clearly noted by this panel as it is real, finally recognised by the applicant & extensive. QLDC must be becoming aware that the people of Queentown & Lakes District are kicking back at being bulldozed into things the community doesn't want. QLDC would not have made this application if they had first consulted extensively with the community.

A more acceptable solution to this application is;

- (a) Fix the broken process that requires ridiculous circumnavigations to make the process work.
- (b) Educate people about what can and can't go into waste water systems.
- (c) Fix the waste water system so that it copes. If necessary make holding tanks to contain overflows.

Roots, foreign objects & fat cause the bulk of overflows. These three items caused 65% of overflows to water & 43% of all overflows to both ground & water. Seems to me the solution here is to take a more proactive approach to waste water pipe maintenance. The use of in pipe CCTV inspections need to be introduced, stepped up &/or extended to eliminate the main problems that cause overflows.

- (d) The other issue I suspect is relevant is the infrastructure is not keeping pace with property development. In this case the council has only one option – upgrade the waste water system to cope before the development takes place – not after.
- (e) Really do something significant when developers discharge into our lakes & rivers e.g. withdraw their authority to continue developing. Surely they must be running out of “wet bus tickets” by now.

This application is a cheap & environmentally inappropriate solution to managing overruns of untreated waste water into our pristine environment.

Do the right thing here People. Decline this application.

Ralph Hume

