

6 October 2015

Wanganui District Council
C/- Opus International Consultants
PO Box 1472
Palmerston North

APP-2015200171.00
JMM:YKS

Attention Tabitha Manderson

Dear Tabitha

RESOURCE CONSENT APPLICATION APP-2015200171.00 – DISCHARGE PERMIT – SOUTH BEACH, WHANGANUI

Thank you for taking the time to meet with us on the 24 September 2015 regarding the Wanganui Wastewater Treatment Plant (WWTP). As discussed, the submission period has now closed and there are six submissions (including the late submission).

As I understand it, there are still two possible options for WDC regarding their WWTP. The options being the construction of a new plant to meet the existing discharge permit or the application for a new discharge permit. As such, the information requested below covers both options.

I am formally requesting the additional information below to assist with the processing of your application. The further information required is listed below and is requested under section 92(1) of the Resource Management Act 1991 (RMA):

Water Quality

The application focused the effects of microbiological quality and benthic ecology based on a desk top review of the reports prepared for previous applications. The assessment notes that there is a risk of the wastewater plume impinging on the shore line and poses a potential risk to surfers, divers and consumers of raw shellfish. The assessment does not quantify the level of risk or identify any mitigation options for these risks. To fully understand the potential health risk it would be useful to have a full range of options and mitigation methods provided. This could include:

- Further details on the potential health risk, this could include the risk of exposure to the wastewater pathogens, the type of activity within an area, the likely magnitude, frequency and patterns of exposure;
- The potential pathogens and their effects on health including the types of pathogens and their persistence in coastal waters and associated illnesses;
- Details on the proposed monitoring including the frequency, sampling locations, sampling methods and the parameters to be measured. One of the points raised within the Public Health Submission is recording additional information along with sampling – is there any proposal to include this?

- Is there any proposal to provide public information on when there is a risk of contamination from occurring along the south beach shoreline based on weather conditions raised within the Public Health submission?
- Has there been any consideration of the Ministry for the Environment and Ministry of Health Recreational Guidelines (2003).

The One Plan outlines water quality standards within the Coastal Marine Area within Schedule I of the One Plan. The objectives and policies of the One Plan in particular 8-3 requires water quality to be maintained where the existing water quality is sufficient to support the values in the management zone and where it is unable to meet the quality it is enhanced to support the water management values in the Coastal Marine Zone (CMZ) (outlined in schedule I of the One Plan). If the option is to move away from the existing discharge permit then this will need to be considered in a new application and the monitoring requirements on this consent may need to be adjusted to gather the necessary information for a long term consent taking into account the existing environment and the water quality targets within the CMZ.

The application includes some mitigation options including signage and a trade waste bylaw. Can you please provide the monitoring triggers to alter the potential health risks, where the signs will be located and what the bylaw is intended to address?

Cultural Effects

While I understand there is one submission from an Iwi group there is no guidance on the cultural effects. Policies within both the One Plan and Coastal Policy Statement makes it clear that the cultural views are to be considered within the decision making process.

The coastal policies of the One Plan also refer to Policy 5-11 of the One Plan which requires existing discharges to address this policy by year 2020 or on renewal of an existing consent. If a new discharge permit is required, has any thought been given to how this may be addressed?

The NZ Coastal Policy Statement, in particular, Policy 23 is very clear that discharges of human sewage must not be allowed where there is no treatment unless there has been consideration of tangata whenua values and the effects on these. Currently there is very little in the terms of cultural effects from the discharge. The discharge is likely to have an impact on the use, values and practices. Further information is required to understand these concerns either by way of a cultural impact assessment or correspondence with the relevant iwi groups outlining the effects on the cultural values.

Progress Steps

Consideration needs to be given to the next steps forward. This is crucial to understanding the effects and temporary nature and how this consent is to be considered both from the Regional Council and potentially submitters.

If the intention is to construct a new plant and comply with the existing discharge permit, then do you have a time line of the proposed works or key milestones to ensure the plant is commissioned within the timeframe of this consent?

I am of the opinion that this should form part of the consent and come through into conditions to provide some certainty to both the Regional Council and submitters.

Alternatively, if the intention is to apply for a new consent with differing discharge standards, you will need to consider what information is required to provide a complete application in terms of the effects. It may be that additional monitoring is required and this will need to be built into the conditions.

Can you please provide confirmation on which option is to occur – whether it will be a new plant to meet the existing discharge consent?

Submissions

As mentioned there are six submissions, three of which wish to be heard. I understand from the meeting that WDC wish to approach the submitters and discuss the proposal with them prior to any formal decision on a pre-hearing or hearing.

One of the submissions was received outside of the submission period. Is the District Council happy to authorise an extension under Section 37 for the notification period? This would ensure all submissions are received within timeframes.

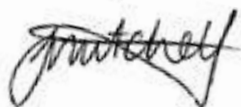
Under section 92A of the Act, you must, within 15 working days of the date of the request, take one of the following options:

- a. provide the information; or
- b. tell the Regional Council in writing that you agree to provide the information (at which point we would negotiate a reasonable time within which you will provide the information); or
- c. tell the Regional Council in writing you refuse to provide the information.

The time taken to provide, or to refuse to provide the information will be excluded from the processing of your consent as per section 88C of the RMA.

If you wish to discuss the application please contact me at the Regional Council's Palmerston North office on 06 952 2898, on freephone 0508 800 800 or via email jasmine.mitchell@horizons.govt.nz.

Kind regards



Jasmine Mitchell
SENIOR CONSENTS PLANNER