

SYNOPSIS of SUBMISSION

To : Hearing Panel

On : Resource Consent Applications by Tararua District
Council relating to Eketahuna Wastewater

By : John Bent

1. To protect the values of the Lower Manawatu River, estuary and proximate coastal areas discharges to land are generally preferred and all indirect discharges to water below the 20th flow exceedance percentile, FEP, are opposed and

 - A. That this application be declined or in the alternative, if the Panel is not so minded,
 - B. The term be six years to coincide with M^r Morton's evidence.
2. The Courts have recognised that such improvements will come at a cost to users.

 - A. Feilding: "[207] We note that there will be a substantial increase in the cost to the community of providing wastewater services as a result of the upgrade to the WWTP but this is an unavoidable consequence of meeting higher environmental performance standards in this case."¹ and

¹ Manawatu District Council & Others v Manawatu District Council & Manawatu Wanganui Regional Council, [2016] NZEnvC 132

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- B. Shannon : "[95] ... We note that there will be a substantial increase in the cost to the community of providing wastewater services, but accept the Applicant's evidence that this is affordable to the community." ² and
- C. p36 "... The Applicant explored a range of possible alternatives and in response to community feedback adopted a solution that placed more emphasis on social, cultural and recreational benefits than economic benefits." ³
- D. My crude interpolation from uncontested expert evidence currently before the Court indicates a Wastewater Uniform Annual Charge on the rated households of Eketahuna of \$1,352 pa. (GST incl)

3. The lack of detail/data/evidence in support of these applications precludes examination of the *minutiae*.

- A. This is the foundation for my relief sought to allow TDC to develop and notify a long term solution (BPO) while providing for the gathering of necessary data in light of the recognised uncertainties.

4. There is no consideration given to the cumulative effects of all Tararua discharges of human sewerage within the Tararua District and external to the Tararua District.

5. In particular, the cumulative contribution of these discharges to the adverse effects below the Palmerston North sewerage outfall.

² Horowhenua District Council, Notice of Motion under s87G, [2015] NZEnvC 45

³ *ibid*

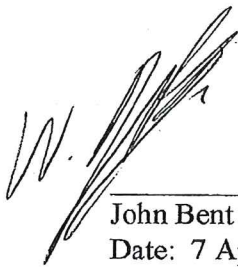
- A. That point source discharges of nitrogen (or any other contaminant, individually or cumulatively) are overwhelmed by non-point source discharges is, I submit, not a reason to do nothing.

6 No attempt to comply with policy 5-11 of the One Plan is proposed.

- A. TDC have had nine months to resolve this issue but have done nothing.
- B. Should the Panel be minded to decline this application then this will no longer be an issue.

7. The General Conditions provide for the establishment of the Tararua District Wastewater Forum (conditions 11 - 16), which I support, but do not set out a purpose or purposes.

8. I propose that the TDWP role be :-
- a. observe and review management decisions, monitoring results and data gathered, and
 - b. keep a 'watching brief' on the management of activities at the EWWTP, and
 - c. consider and comment on long term options for treatment and ultimate disposal of wastewater from the EWWTP.⁴



John Bent
Date: 7 April 2017.

⁴ From the proposed draft for Tokomaru

