

BEFORE THE HEARING COMMITTEE

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of applications by Tararua District Council to Manawatu-Wanganui Regional Council for application **APP-2010014267.02** for resource consents associated with the Woodville Wastewater Treatment Plant, including construction of wetlands, a discharge of wastewater into the constructed wetland (initially), then to the Mangapapa Stream, a discharge to air (principally odour), and discharge to land via pond and wetland seepage, near Troup Road West, Woodville

REPORT TO THE COMMISSIONERS

DR BRENT COWIE (CHAIR), MS LIZ BURGE AND MR PETER CALLANDER

CONDITION CHANGES COMMENTARY – FIONA MORTON

21 May 2021

A. INTRODUCTION

Post Hearing Commentary

1. The Woodville WTP Hearing was adjourned on 13 May 2021, with the Regional Council tasked with provided an updated set of conditions based on information tabled and discussions had at the Hearing. In additional Mr Patterson and Dr Greer were to discuss parameters required for a Dissolved Oxygen (DO) condition.
2. **Appendix A** provides an updated set of conditions. I met with Ms Manderson on 20 May 2021 to go through these changes.
3. The DO discussions are ongoing. Appendix A includes a 'state of play' condition to represent where discussions are at currently. The Applicant right of reply may include additional commentary around this condition.
4. Mr Patterson has provided the following technical commentary in respect of the DO conditions included in Appendix A:

"My opinion is that the DO condition should be included as written. I understand there is no contention around the technical aspects of monitoring through DSW26 and DSW27; and the assessment approach in DSW30. The contention is around whether this monitoring and associated standard should be included in a condition of consent. I am of the opinion that it should for two reasons.

One, the One Plan recognises the use of Dissolved Oxygen as a parameter of import to Life Supporting Capacity, and it stipulates a value in Schedule E for each management sub-zone. The science that supports the NPS-FM (2020) is simply a far more scientifically current and robust measure of the same parameter, to protect the same or very similar value (though expressed as ecosystem health).

Two, I understand that the NPS-FM (2020) is in effect and must be considered. Attributes listed in appendix two of the NPS-FM (2020) are in effect compulsory to consider where applicable (section 3.10 NPS-FM (2020)). The dissolved oxygen attribute (table 7) specifically relates to point source discharges. The attribute also has a national bottom line that must be employed unless it would naturally be below the national bottom line (NPS-FM (2020) section 3.11; and 3.33), which is in my view, very unlikely to be the case. Therefore as the national bottom line is compulsory; the attribute is only applicable at this location because

of this activity; and the activity has the potential to directly impact this attribute, it is my view that it should be a condition of consent.

5. This document is intended to be a 'running record' of changes made to the conditions, with additional commentary made (if required).
6. Further **Appendix B** is attached and has been prepared by Mr Tim Baker and Ms Ella Boam following the question from Mr Peter Callander.

Changes to General Conditions

Condition	Change made	Commentary
Definitions	Inclusion of Reaches A, B and C	Clarifies monitoring point reaches. Allows for the change in monitoring point location following the change in discharge location
	Reasonable mixing zone	Defined in accordance with the definition in the One Plan. Please note the RMZ distance of 70 metres remains the same regardless of the discharge point location.
	Wetland treatment system	Words added to clarify that the proposed biodiversity wetland is not included as part of the wetland treatment system.
G1	Clause c added	To allow for reference to the draft ESCP
G1	Discharge Point location	Reference added that the discharge from the WWTP is to the Manga-atua Stream.
G4	Clause o added	To require consideration and management of nuisance pests and wildlife within the OMP
G10-G11	Review of OMP	Requiring the OMP to be reviewed on an Annual Basis and updates provided to MWRC
G12	'Five' added 'treatment wetland system'	To provide an end timeframe for when treatment wetland system is required to be installed and operational.

G13	Changed Reach reference	To accommodate signage required from commencement and following the change in the discharge location
G19	Term	
Footnote #. 2	Relevant iwi authority	Footnote added

Changes to Discharge to Surface Water Conditions (DSW)

Condition	Change made	Commentary
Definitions	Reasonable mixing zone	Defined in accordance with the definition in the One Plan. Please note the RMZ distance of 70 metres remains the same regardless of the discharge point location.
DSW 1-DSW4	Timeframes adjusted	Timeframes on these conditions have been adjusted to 12 and 48 months accordingly. In particular the Consent Holder has 48 months to achieve a reduction in TSS and 12 months to achieve a reduction in DRP
DSW 5	Timeframe reference removed	Regardless of location, all discharges from the WWTP must pass through the Treatment Plant.
DSW 7	Timeframe adjusted	For the first 48 months s107 matters are the compliance standard. Reference to map showing existing discharge point included.
DSW 8	Timeframe adjusted	Additional parameters added following WWTP upgrades. Reference to map showing relocated discharge point included.
DSW 8 (f)	Change to ammoniacal nitrogen	To reflect national bottom line in the NPSFM

Advice note	Reference to NPSFM	Included for compliance purposes
DSW 9 (a)	Consequential cross-referencing	Required as result of splitting DSW 7 into two conditions (DSW 7 and DSW 8)
DSW 9 (g)	Wording updated	Made following discussions at Hearing
DSW 18	Timeframe adjusted – Until 48 months	
DSW 19	Timeframe adjusted – From 48 months	New condition added to allow for timeframes. Specifies the change in Reaches where monitoring is required.
DSW 21	Timeframe adjusted – From 48 months	As discussed at the hearing, macroinvertebrate monitoring is not required until Treatment Plant upgrades have been completed.
DSW 22	Reference to map	Specifies that the map forms part of the consent.
DSW 22 (a) and (b)	Reference to distances	Specifies the approximate reaches where the macroinvertebrate is required.
DSW 23 and 24	Timeframe adjusted – From 48 months	To clarify that macroinvertebrate monitoring is not required until Treatment Plant upgrades have been completed.
DSW 26 – 32	Dissolved oxygen monitoring	<p>Condition that has evolved since hearing. Further changes may occur in Applicant's right of reply.</p> <p>The condition is intended to require initial round of monitoring. Additional monitoring only required if there is a shift in NPSFM bands or if it falls into Band D of the NPSFM.</p> <p>Additional 3 years of monitoring required if that occurs.</p>

		Condition DSW 33 requires that changes required to ensure that DO levels do not fall into Band D of the NPSFM – which is a National Bottom line.
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Changes to Pond and Wetland Seepage Conditions (DLW)

Condition	Change made	Commentary
DLW 1 – DLW 2	Removal of previous conditions and replaced with new conditions.	Discussed and agreed between Groundwater experts at the hearing
DLW 4	Timeframe adjusted	Changed to 1 July 2023
DLW 4 (a) DLW 4 (b) DLW 4 (c)		Changes made to specify that this condition is in respect to discharge from the ponds and that the effects of this potential discharge are assessed against instream changes.
DLW 5	Timeframe adjusted Reference to biodiversity wetland removed	Changed to 24 months
DLW 5 k-p	Reference to biodiversity wetland removed	
DLW 6	Reference to biodiversity wetland removed	
DLW 8	Clarity and cross-reference added	To clarify when monitoring of the treatment wetlands shall commence.

DLW 10 – DLW 11	SIN reduction conditions	Consistent with Pahiatua and Eketāhuna. Previous Advice note is now condition DLW 11
DLW 13 – DLW 16		Closing the loop in respect of what has to occur if there are issues with DLW 11 (d)
DLW 19	Additional of 'surface flow'	It is only the Surface Flow wetland that requires pruning (not the Vertical Flow)
DLW 21	Additional of 'surface flow'	As above

7. There are no changes proposed to the Discharge to air or Earthworks consents.
8. In addition to the matters detailed in the tables above, minor formatting and consequential cross-referencing changes have been made.

Appendix A – Revised Conditions – 21 May

Appendix B – Groundwater Technical Joint memorandum – Groundwater Contaminant Load



Fiona Morton

CONSULTANT SENIOR PLANNER

21 May 2021