

13 September 2019

**Clutha District Council RM15.364** - To discharge up to 680 cubic metres per day under normal flow and up to 1,020 cubic metres per day under wet weather conditions, for the purpose of disposal of treated sewage effluent at the Waihola Oxidation Pond.

**This submission is made on behalf of Te Nohoaka o Tukiauau / Sinclair Wetlands Trust (the Trust).**

**The Trust opposes this application for resource consent.**

**We do wish to be heard in support of this submission.**

## **1. Te Nohoaka o Tukiauau**

The Sinclair Wetlands form a 315-hectare portion of the Lakes Waihola-Waipori wetland complex, south of Dunedin, New Zealand.

The name Te Nohoaka o Tukiauau acknowledges ‘the dwelling place of Tukiauau’, an early Ngāti Mamoe chief. The area is now owned by Te Rūnanga o Ngāi Tahu and is valued as a wāhi taonga (culturally significant site), for mahinga kai (traditional food and resources), conservation, recreation, and education.

Since 2011 the wetlands have been managed by Te Nohoaka o Tukiauau/ Sinclair Wetlands Trust. This comprises up to eight volunteer Trustees, including representatives of Te Rūnanga o Ōtākou, and of the Tatawai Whenua Tapu Trust that manages an adjoining part of the wetland.

Our vision is that Te Nohoaka o Tukiauau is a restored wetland ecosystem that is ecologically diverse and nationally known for sustainable practices, community involvement and as an important Ngāi Tahu mahinga kai site. We are committed to careful and thoughtful kaitiakitanga/stewardship of the important environment entrusted to us, and work actively to ensure that it is enhanced for future generations to use and enjoy.

The Trust has a holistic view and understands that Te Nohoaka o Tukiauau/Sinclair Wetlands is part of the wider ecosystem of the Waihola-Waipori wetland complex. Therefore, the Trust is interested in activities that may affect any part of Waihola-Waipori wetland complex.

The Trust understands that Clutha District Council is applying for resource consent to enable the continued discharge of treated wastewater to the outflow channel of Lake Waihola.

## 2. Submission

- 2.1. The Waipori/Waihola Lake — Wetland complex is a highly valued area, providing the following values:
- Recreation values for activities such as swimming, boating and bird watching
  - Duck hunting, fishing and other mahinga kai activities such as whitebaiting
  - Ecological values for native birds and aquatic species. As stated in the application, the Department of Conservation has identified the Waipori/Waihola Lake — Wetland complex is a coastal system of great ecological importance
  - Cultural values. As Te Nohoaka o Tukiauau is a tribal property owned by Ngāi Tahu, the Trust is also tasked with protecting cultural values. Schedule 1D of the Regional Plan: Water identifies the Waipori/Waihola Lake — Wetland complex as providing all nine cultural values identified in the plan.
- 2.2. In spite of being a highly valued area, the Waipori/Waihola Lake — Wetland complex is degraded in parts. 2013-2018 State of the Environment monitoring for Lake Waihola shows the water quality in the lake is poor. Lake Waihola falls into the ‘Poor’ category, and exceeds standards for turbidity, total nitrogen and total phosphorus (ORC, 2018). Therefore, it is important to protect this taonga from further degradation.
- 2.3. The Trust generally prefers discharges of wastewater to occur to land and believes that discharges to freshwater bodies should be avoided. This is consistent with Policy 7.B.1 (g) of the Regional Plan: Water: “Manage the quality of water in Otago lakes, rivers, wetlands and groundwater by promoting the discharge of contaminants to land in preference to water”.
- 2.4. The Trust is concerned about wastewater discharges to a tidal water body such as Lake Waihola. The Trust appreciates that discharges are currently timed with the tidal cycle to prevent the wastewater from being carried into Lake Waihola. However, it is not possible to guarantee that no treated wastewater is entering the lake, and the high water retention time of Lake Waihola (on average 151 days (Schallenberg *et al.*, 2003)) means that any contamination will be slow to be flushed from the system.
- 2.5. The Trust supports Clutha District Council’s proposal to construct facilities to further treat the Waihola wastewater. However, disposal to land would be better, and the Trust hopes that both improvements in effluent quality and discharge to land will occur in the near future.
- 2.6. Waihola and the surrounding areas have growing populations. This application includes higher discharge volumes than are currently occurring to provide for that growth. The Trust believes that as the population grows and the pressure on the wastewater system increases, the appropriate response is to find an alternative discharge option rather than discharging greater volumes of wastewater into the Waipori/Waihola Lake — Wetland complex.
- 2.7. The Trust believes that a term of consent of 35 years is too long. Within this period, wastewater discharges to water bodies should cease and wastewater treatment should improve, therefore a shorter term of consent is more appropriate.

### **3. Decisions Sought**

- 3.1. That this application for resource consent is declined
- 3.2. That if resource consent is granted, the term of consent is less than 35 years

### **E noho ora mai**

#### **Address for Service**

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### **References**

Otago Regional Council "Water quality and ecosystem health in Otago July 2013 to June 2018" Otago Regional Council (2018).

Schallenberg, Marc, Carolyn W. Burns, and Barrie M. Peake. "A temperate, tidal lake-wetland complex 1. Water balance and ecological implications." *New Zealand Journal of Marine and Freshwater Research* 37, no. 2 (2003): 415-428.