



21 February 2022

Rob Loeffering - Commissioner

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Dear Rob

## **Waihola Wastewater Discharge RM15.364**

We have received an independent review undertaken by BECA with regard to the document prepared by Dr Greer. They have identified inconsistencies which need to be resolved before conclusions can be reached.

We also would like to note that the process for this consent has now taken 7 years and all parties appear to have a level of comfort for a term of 6 years for the new consent.

The long-term scenario is that the existing discharge regime will not continue after the expiration of this consent unless it can conclusively be shown that no other options are acceptable or practicable.

The most important feature of this consent is that the future consent will be the best consent that it can possibly be. The second most important feature of this consent is that the discharge is improved to a level that is consistent with the short-term nature of the consent and does not waste investment for the long-term options.

We would prefer costs to be spent on improving the discharge and prefer to start work as soon as we can, especially given the lead time for supply of plant and contractors to complete a project will take at least 12 months.

The Council has received a proposal for the upgrade of Waihola and this is attached. Final details are potentially subject to the outcome of the Resource Consent process.

The outstanding issue to be resolved is the volume of discharge. The high figures are due to Infiltration and Inflow. These are determined by rainfall not only in the catchment of the Waihola wastewater network but also the surrounding area, including the catchment of the Taieri which determine the lake levels and the consequent groundwater levels. These are issues that are being addressed through the Long-Term Plan however the results may not all be felt during the term of this consent.

Council has committed to house-to-house inspections across the entire district and this work is underway and is about three quarters of the way through. This will also require follow-up and

discussions with homeowners as the repairs are required to be paid for home owners. Council has confirmed that this work is ongoing and have proposed a position to continue this work in the current draft Annual Plan.

For Waihola the Council has an Operations and Maintenance Manual and a section in the Activity Management Plan and the Long-Term Plan.

The Resource Consent process will confirm limits on the discharge parameters, and the process needs to recognise that wastewater is not an exact science due to the many variables that can affect the day to day and month to month process. The Resource Consent process needs to ensure that the Council completes robust planning and follows its processes to optimize the operation of its infrastructure. When exceptions occur to the Resource Consent requirements it can be expected to revisit these processes.

There is risk that the understanding of the results of the measurements of the Resource Consent parameters will be lost due to their complexity by the time those responsible for the day-to-day work and operation of the plant realize that they have failed to meet the conditions.

We believe that it would be appropriate to require an upgrade of the Waihola Wastewater Treatment Plant approximately as detailed in the Marshall projects proposal. We also believe that the Resource Consent parameters be established based on the average of 12 months records after the plant has been commissioned and that thereafter all parameters should show an improvement when based on a 12-month trend. Should the trend not be down then a revision of the Operations and Maintenance Manual or the relevant section in the Activity Management Plan and the Long-Term Plan is expected to be required to the satisfaction of the consent authority.

We repeat here the information sent to you by Jo Jack - Executive Assistant for our CEO on 4 February 2022.

*Please find attached an extract from our Infrastructure Strategy showing projects included in The Long-Term Plan for design and construction. It identifies the New Treatment Plant planned for Milburn and the upgrades anticipated for the next consent to Waihola Discharge (Total \$31M).*

*Also attached is the finalised brief from Fluent Solutions for investigation of long-term disposal options for wastewater from existing and future East Coast discharges from our treatment plants.*

*The intent is that investigation and confirmation of future options be completed in time for the results to feed into the next Activity Management Plan which will form the basis for the next Infrastructure Strategy and the next Long-Term Plan commencing on 1 July 2024. The 2024-34 Long Term Plan will establish budgets for the first three years. This budget will allow for project selection, land purchase, design and initiation of the consenting process. The following three-year budget in the 2027-32 Long Term Plan will allow for the completion of consenting and construction of treatment plants that will supersede the existing Waihola Treatment Plant. As the Waihola Treatment Plant Renewal and Upgrade is part of a whole of East Coast of Clutha package the outcome of the investigation should not be preempted.*

*Iwi engagement will be part of the land assessment proposal and will be led by Clutha District Council.*

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*It is to be noted that the Long-Term Plan is open to consultation. This allows for input from the public, Iwi and the Regional Council. 3 Waters reform may change the processes from 2024 onwards however the understanding is that meeting future consent requirements and the replacement of the Resource Management Act will still be mandatory.*

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Jules Witt', is placed on a light blue rectangular background.

Jules Witt

**Group Manager Service Delivery**