

Submission No:

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

**Full Name/s** Robyn & John Gerard Cooney

**Full Postal Address:** [REDACTED]

**Post Code:** [REDACTED]

**Please provide your preferred contact phone number:** [REDACTED]

**Email address:** [REDACTED]

I/ we wish to submit a **OPPOSE** (choose one) submission on the application of:

**Applicant's Name:** **Queenstown Lakes District Council**

**Application Number:** **RM19.051.01**

**Location:** **Various locations throughout the Queenstown Lakes district**

**Purpose:** **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application that my submission relates to are: *(Give details)*

The purpose i.e. all of it - the discharge of untreated wastewater into various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages etc.

*My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).*

We are directly affected by the proposal as users of the Clutha River for potable water and recreation. We oppose the application in its entirety. In support of our position we provide the following explanation. The applicant in its application recognises "Wastewater networks are critical for protecting communities from unnecessary exposure to wastewater. Exposure can result in an adverse impact to human health." Hence we can all agree that discharging untreated wastewater is adverse to humans and therefore by reasonable deduction most if not all living things exposed. (Please see attached pages for further comment on our reasons for opposing the application)

**Submission No:**

I/We seek the following decision from the consent authority (*give precise details, including the general nature of any conditions sought*)

Proposal to be declined.

No conditions acceptable.

I/we:

- Wish to be heard in support of our/my submission  
 Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes  
 No

I, Am Not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

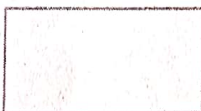
I, Am (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, Do (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do Not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have served a copy of my submission on the applicant.



**Signature/s of submitter/s** (or person authorised to sign on behalf of submitter/s)

12-Jul-19

(Date)

We are directly affected by the proposal as users of the Clutha River for potable water and the waterways of Queenstown Lakes and Central Otago for recreation. We oppose the application in its entirety.

In support of our position we provide the following explanation.

The applicant in its application recognises "Wastewater networks are critical for protecting communities from unnecessary exposure to wastewater. Exposure can result in an adverse impact to human health." (RM 19.051 application P 4)

Hence we can all agree that discharging untreated wastewater is adverse to humans and therefore by reasonable deduction most, if not all living things exposed.

The quality of our waterways are under threat from a range of polluters, for example much has been made of the adverse impact dairy animals have on the quality of waterways. Government reports have highlighted this for example:

"Freshwater quality in our lakes and rivers is a subject of high public concern and vigorous debate. There are three main water pollutants of greatest concern in New Zealand. These are pathogens, sediment, and nutrients (**Parliamentary Commissioner for the Environment**). Pathogens are invisible microbes that cause disease. Typical sources are raw and partially treated sewage entering lakes and rivers (usually at specific points); another source is the diffuse entry of faecal coliforms from farm animal excrement leaching into waterways. Soil erosion, particularly along river banks, causes sediment. Phosphorus and nitrogen, primarily from animal urine and fertilisers, are the main sources of nutrient pollution.

In 1991 the "sustainable management" of fresh water was assigned to the regional councils under the Resource Management Act 1991. End-of-pipe (or point) sources of water pollution, which require resource consents, became increasingly controlled and much has been invested in upgrading wastewater treatment. (Published 8 Oct 2014 <https://www.parliament.nz/en/pb/research-papers/document/00PLEcoC51261/freshwater-quality-in-new-zealand>)"

Despite this assignment in 1991, almost thirty years ago, clearly the Otago Regional Council (ORC) has been at best slow to deal with the very predicatble problem. Growth in the Queenstown-Lakes area has been fast, furious and fully encouraged by the QLDC, NZ government and by association and/or default ORC. This growth has come with the fully predictable need for infrastructure. The bodies mentioned have failed to respond to the physical consequences of the highly visible and encouraged growth. Infrastructure under strain is more likely to fail.

To deal with this the QLDC now wants the legal right to pollute our major Otago waterways for the next 35 years.

The explanation of why this is appropriate from the 'Creative people together transforming our world' is summarised on page 4 of the application:

"Wastewater flows easily through the wastewater network pipes when only human waste and toilet paper is flushed, and when only soapy water is put down drains. Blockages and breakages occur in the wastewater pipes when foreign objects such as fats, sanitary items, wet wipes, construction offcuts, debris and dust are put into the network at pipe openings (in houses, businesses or at manholes). External influences such as tree roots invading pipes are also another cause of pipe damage. Storm events can also cause overflows from the network through capacity exceedance, but this is an uncommon occurrence in the Queenstown Lakes District."

All of these occurrences are predictable and able to be managed through the application of some intelligence and technology. A variety of design and management responses can be put in place to truly minimise the risks. Instead the QLDC has simply asked to be legally allowed to discharge when these predictable things happen to cause problems. Hence it is unacceptable in our view in 2019 (and for the next 35 years at least) to allow this to happen as of right for any applicant.

Instead the ORC must maintain the ability to reprimand the QLDC for 'lazy running' otherwise nothing will happen. Our environment is our greatest resource but we still have this notion recommended by engineers that these blatant and unhealthy practices are simply 'engineered overflows' as if providing a professional definition makes it ok to do.

Taking the easy out and having 35 years until the next consent application (given the QLDC and ORC have had almost 30 years already to sort) does not force a rethink of the systemic drivers of the problem. It sets the precedent for using our waterways as drains of necessity making the ORC less able to demand improvements in other locations and uses. It lets the NZ government off the hook for their economic growth drive without seeing its implications on other supposedly important environmental outcomes it desires.

I'm assuming the QLDC is really just doing this to hear the overwhelming community rejection of this proposal, to support its case for the NZ government support to deal properly with the infrastructure needs, as you would have to have rocks in your heads if you think this is a sensible thing to recommend or approve. So good luck with your plan.

For these reasons outlined we oppose the application and suggest

- the discharges remain illegal
- the QLDC actively build a partnering relationship with the ORC to design more valid responses to the types of risks outlined.

Robyn & John Cooney

**Submission No:**

### **Submission Form 13 to the Otago Regional Council on Consent Application RM19.051**

**This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.**

**Submitter Details:**

**Full Name/s** Robyn Williams

**Full Postal Address:** \_\_\_\_\_  
\_\_\_\_\_ **Post Code** \_\_\_\_\_

**Please provide your preferred contact phone number:** \_\_\_\_\_

**Email address:** \_\_\_\_\_

I/ we wish to submit a **OPPOSE**  (choose one) submission  
on the application of:

**Applicant's Name:** Queenstown Lakes District Council  
**Application Number:** RM19.051.01  
**Location:** Various locations throughout the Queenstown Lakes district  
**Purpose:** To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

The specific parts of the application that my submission relates to are: *(Give details)*

OPPOSED To the discharge untreated wastewater to various freshwater receiving environments including lakes and rivers

*My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).*

OPPOSED to the TERM of 35 years

**Submission No:**

I/We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)

Alternative solutions must be found - consent term to be reduced to 7 years.  
And should not be extended *[Signature]*

I/we:

- Wish to be heard in support of our/my submission
- Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes
- No

I, Am Not  (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

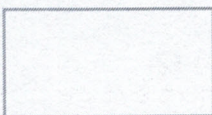
I, Am  (choose one) directly affected by an effect as a result of the proposed activity in the application that:

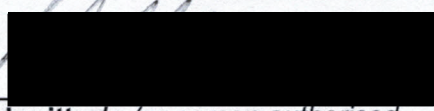
- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

I, Do Not  (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do  request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have Not  served a copy of my submission on the applicant.



*[Signature]*  


Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)

11-07-2019  
(Date)

## Submission No:

### **Notes to the submitter**

If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.

If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The address for service for the Consent Authority is:

**Otago Regional Council, Private Bag 1954, Dunedin, 9054**  
or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**  
Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

Submission No:

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

**Full Name/s** Rod Walker

**Full Postal Address** [REDACTED]  
[REDACTED]  
**Post C** [REDACTED]

**Please provide your preferred contact phone number:** [REDACTED]

**Email address:** [REDACTED]

I/ we wish to submit a **OPPOSE** (choose one) submission on the application of:

**Applicant's Name:** Queenstown Lakes District Council  
**Application Number:** RM19.051.01  
**Location:** Various locations throughout the Queenstown Lakes district  
**Purpose:** To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

The specific parts of the application that my submission relates to are: *(Give details)*

I am making this submission to register my opposition to the application in the strongest possible terms. This applies to the hole application.

My/Our submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).*

Our waterways, rivers and lakes are already under threat from multiple sources, and we should not be allowing discharge of untreated wastewater into these systems under any circumstances. Such discharge threatens to cause both short and long term damage which can and should be avoided. It should be part of QLDC's responsibility to assess potential points of weakness, failure or blockage, and to put sufficient safeguards in place to ensure that discharge of untreated wastewater is not required. Potential solutions could include holding tanks, secondary overflow systems, holding ponds, water treatment systems and more. These systems should all be monitored and maintained to a high standard. The Queenstown Lakes District area is an area of outstanding natural beauty which has become sor



**Submission No:**

I/We seek the following decision from the consent authority (*give precise details, including the general nature of any conditions sought*)

I ask that the ORC declines QLDC's application for consent, in its entirety, and (if within its powers) directs the applicant to come back with a more sustainable, environmentally friendly plan to deal with waste water.

I/we:

- Wish to be heard in support of our/my submission  
 Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes  
 No

I, Am Not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, Do Not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do Not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have Not served a copy of my submission on the applicant.



Rod Walker

Digitally signed by Rod Walker  
DN: C=NZ, CN=Rod Walker,  
E=rgwalkerz@gmail.com  
Reason: I am the author of this document  
Location: your signing location here  
Date: 2019-07-12 11:09:18  
Foxit Reader Version: 9.5.0

**Signature/s of submitter/s** (or person authorised to sign on behalf of submitter/s)

(Date)

## Submission No:

### ***Notes to the submitter***

If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.

If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The address for service for the Consent Authority is:

**Otago Regional Council, Private Bag 1954, Dunedin, 9054**  
or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

Submission No: \_\_\_\_\_

**Submission Form 13 to the Otago Regional Council on consent application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**  
(please print clearly)

Full Name/s Roderick Baxter

Full Postal Address: \_\_\_\_\_

Post Code: \_\_\_\_\_

Please provide your preferred contact phone number: \_\_\_\_\_

Email address: \_\_\_\_\_

I/ we wish to submit a **SUPPORT** / **OPPOSE** / **NEUTRAL** submission on (circle one) the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application/s that my submission relates to are: (Give details)

The discharge of untreated waste into (any) freshwater environment.

My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).

I totally oppose this application. In a situation where most of our country's freshwater is too polluted to swim in and totally unsuitable for drinking - and where farmers and industrial applications are fined large amounts of money for polluting waterways, I find it absolutely reprehensible that this particular application should even be submitted.

Page 1 of 3

If the ORC even considers this application - despite all the submissions in support of it, you are not representing the will of the people you represent.

Submission No: RM 19-051,01

I/We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)

Total Rejection of the QLDC submission.  
Even a shorter term than the 35 years suggested  
is unacceptable. Discharging untreated sewage  
into a freshwater source used by numerous  
other members of the Central Otago region is  
not an option.

I/we:

- Wish to be heard in support of our/my submission  
 Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes  
 No

I, ~~am~~ **not** (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

\*If trade competitor chosen, please complete the next statement, otherwise leave blank.


I, ~~am~~ **not** (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and  
b) does not relate to trade competition or the effects of trade competition.

I, ~~do~~ **not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I, ~~do~~ **not** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority. //

I, ~~have~~ **not** served a copy of my submission on the applicant.

  
\_\_\_\_\_  
Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)

11-07-2019.  
\_\_\_\_\_  
(Date)