

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 Anita Jansen

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 entire submission to discharge untreated waste into various freshwater and land where it may enter freshwater.

(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 oppose the submission due to a number of reasons including pollution, algae + toxic conditions to the waterways + the impact this will have on the region, environment, people + future generations. In 1984 sewage overflowed close to water supply in Queenstown causing 3,500 Gastroenteritis in people. Better process, planning + infrastructure + education should be put in place. If this submission becomes legal to discharge untreated waste into the waterways, then there is no difference to freedom camps/people sitting in near the lake.

Submission No: _____

① We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)

Otago Regional Council needs to have regions best interests at heart, and I urge them to oppose this submission based on both environmental & health concerns to communities & future generations. This submission contradicts the Government plan to clean up all lakes/streams & our clean green image. QLDC should be held accountable, provide a better solution without impacting the surrounding environment as the region is growing & this will allow ongoing issues for overall regional waterways without resolving the underlying issue.

- ② 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~~ 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/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/do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I do/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/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)

From: [REDACTED]
To: [Submissions](#)
Cc: alisha.robinson@beca.com
Subject: Submission re Dumping Sewage into Lakes and Rivers
Date: Thursday, 11 July 2019 9:51:04 p.m.

The following is my submission relation to application no. RM19.051 - full details are below.

This application is being emailed to [submissions@orc.govt.nz] (mailto:submissions@orc.govt.nz) and copied to the applicant at alisha.robinson@beca.com. Please contact me by return email if there is anything further you need from me in order for the application to be valid.

1. My details

Name: Ann Dodds

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of 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 proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

3. Whether it is in support or opposition.

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

4. Submissions and reasons

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 sort after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLD has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted. The QLDC should be held to the highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which could threaten the very reason tourists flock to Central Otago. It simply makes no sense to allow QLDC to pollute our natural resources - resources which are the reason tourists want to come to Central Otago.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? In my view, this is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

5. Decision I wish Council to make.

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.

6. Wish to be heard.

I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

Sent from Samsung tablet.

From: [REDACTED]
To: [Karen Bagnall](mailto:karen.bagnall@orc.govt.nz)
Cc: alisha.robinson@beca.com
Subject: RE: Submission re Dumping Sewage into Lakes and Rivers
Date: Friday, 12 July 2019 1:12:09 p.m.

I AM NOT a trade competitor.

I DO NOT wish to be involved in any pre hearing meeting

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 (see the cc line of my email).

Sent from Samsung tablet.

----- Original message -----

From: Karen Bagnall <karen.bagnall@orc.govt.nz>

Date: 12/07/19 12:02 PM (GMT+12:00)

To: [REDACTED]

Subject: RE: Submission re Dumping Sewage into Lakes and Rivers

Good afternoon – thank you for your submission – unfortunately there were a few things omitted – can you confirm the following;

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

I **do/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/have not served a copy of my submission on the applicant.

Could please reply to the submission e-mail address as per your original submission.

Please note that submissions close at 5 pm on Friday 12 July 2019

Please do not hesitate to contact me should you have any questions.



Karen Bagnall

SENIOR CONSENTS SUPPORT OFFICER

Otago Regional Council

70 Stafford St
Private Bag 1954 Dunedin 9054

P (03) 474 0827 or 0800 474 082

karen.bagnall@orc.govt.nz
www.orc.govt.nz

Important Notice

This email contains information which is confidential and may be subject to legal privilege. If you are not the intended recipient, you must not peruse, use, disseminate, distribute or copy this email or attachments. If you have received this in error, please notify us immediately by return email, facsimile (03 479-0015) or telephone (03 474-0827) and delete this email. The Otago Regional Council accepts no responsibility for changes made to this email or to any attachments following the original transmission from its offices. Thank you

From: [REDACTED]
Sent: Thursday, 11 July 2019 9:51 p.m.
To: Submissions <Submissions@orc.govt.nz>
Cc: alisha.robinson@beca.com
Subject: Submission re Dumping Sewage into Lakes and Rivers

The following is my submission relation to application no. RM19.051 - full details are below.

This application is being emailed to [submissions@orc.govt.nz] (<mailto:submissions@orc.govt.nz>) and copied to the applicant at [alisha.robinson@beca.com] (<mailto:alisha.robinson@beca.com>). Please contact me by return email if there is anything further you need from me in order for the application to be valid.

1. My details

Name: Ann Dodds

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of 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 proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

3. Whether it is in support or opposition.

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

4. Submissions and reasons

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 sort after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLD has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted. The QLDC should be held to the highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which could threaten the very reason tourists flock to Central Otago. It simply makes no sense to allow QLDC to pollute our natural resources - resources which are the reason tourists want to come to Central Otago.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? In my view, this is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

5. Decision I wish Council to make.

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.

6. Wish to be heard.

I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

Sent from Samsung tablet.

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 Ann-houise Stokes

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)

It is QHDC's responsibility to make sure our infrastructure is maintained and monitored to the highest standards. If we cannot guarantee the infrastructure to treat our wastewater we should not be planning for more tourists, until we can.
and therefore more pressure on the infrastructure

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).

opposes the discharge of untreated wastewater.

This is not an acceptable practice in this day and age. Our lakes + rivers should be maintained in the most pristine of condition, they are the jewel in the crown of our lakes District.

Submission No: _____

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

That the ORC declines QHDC's application
and instructs QHDC to ensure its infrastructure is
robust enough to cope with unforeseen pressures.

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

I ~~do~~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~~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)

12.7.2019.
(Date)

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 Anna Ryder

Full Postal Address: [REDACTED]

Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

I/ we wish to submit a [REDACTED] **SUPPORT / OPPOSE / NEUTRAL** (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 entire thing. Disposing of human or any type of waste (including treated) into water ways should never be an option for the obvious reason of water pollution to our drinking and recreational waterways. There should be a long term solution in place. My question is if our systems can't handle the waste we Produce perhaps we need to look at our community growth And some fore thought for long term environmental solutions.

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).

Submission No:

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

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

I ~~do~~/~~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~~/~~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)

27/06/2019

(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

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

Karen Bagnall

From: Anna [REDACTED]
Sent: Friday, 12 July 2019 4:34 p.m.
To: Submissions
Cc: alisha.robinson@beca.com
Subject: Application no. RM19.051

The following is my submission relation to application no. RM19.051 - full details are below. This application is being emailed to submissions@orc.govt.nz and copied to the applicant at alisha.robinson@beca.com. Please contact me by return email if there is anything further you need from me in order for the application to be valid.

1. My details

Name: Anna Scott Walker

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of 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 proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

3. Whether it is in support or opposition.

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

4. Submissions and reasons

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 sort after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLD has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted. The QLDC should be held to the highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which could threaten the very reason tourists flock to Central Otago. It simply makes no sense to allow QLDC to pollute our natural resources - resources which are the reason tourists want to come to Central Otago.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? In my view, this is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

5. Decision I wish Council to make.

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.

6. Wish to be heard.

I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

Other declarations:

I AM NOT a trade competitor.

I DO NOT wish to be involved in any pre hearing meeting

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 (see the cc line of my email).

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 Anna Simmonds and Matthew Evrard

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)*

All parts relating to the discharge of waste water overflows from the QLDC sewage network to freshwater receiving environments

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).*

See attached RM19051_SimmondsAnna_OurSubmissionIs.pdf which accompanies this submission form in our email -
██

Submission No:

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

That the consent not be allowed in its entirety as the consent does not meet the requirements of the National Policy Statement for Freshwater management.

All discharge events will present a more than minor threat to our high quality alpine waterways.

QLDC should be required to provide holding tanks which will be a last resort capture so that NO wastewater discharge is ever permitted to be discharged in to our lakes. Extreme storm events should no longer be considered extreme, they will not be out of the ordinary with our climate changing and we need to plan accordingly.

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 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.





08-Jul-19

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](#).

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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

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

"that the consent not be allowed in its entirety. It does not meet the requirements under the National Policy Statement for Freshwater Management specifically in regard to:

The National Policy Statement for Freshwater Management

A. Water quality Objective A1 To safeguard: a) the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, of fresh water; and
b) the health of people and communities, as affected by contact with fresh water; in sustainably managing the use and development of land, and of discharges of contaminants.

Maintaining or improving the overall quality of fresh water within a freshwater management unit.
National Policy Statement for Freshwater Management Objective A2 The overall quality of fresh water within a freshwater management unit is maintained or improved while: a) protecting the significant values of outstanding freshwater bodies; b) protecting the significant values of wetlands; and c) improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated.

Improving water quality so that it is suitable for primary contact more often.
National Policy Statement for Freshwater Management Objective A3 The quality of fresh water within a freshwater management unit is improved so it is suitable for primary contact more often, unless: a) regional targets established under Policy A6(b) have been achieved; or b) naturally occurring processes mean further improvement is not possible."

Submission No: RM19.051

Submission Form 13

File No: RM19.051

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

Applicant Details:

Applicant: **Queenstown Lakes District Council**

Application No: **RM19.051.01**

Consent Type: **Discharge Permit**

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**

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

Map reference: **Various locations throughout the Queenstown Lakes district**

Legal description: **Various locations throughout the Queenstown Lakes district**

Submitter Details: (please print clearly)

Full Name/s Anna van Riel

Full Postal Address: [REDACTED]

[REDACTED] Post Code: [REDACTED]

- Work Ph: [REDACTED]
- Home Ph: _____
- Mobile Ph: _____
- Email address: _____

(please tick your preferred Daytime contact number)

[REDACTED]

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

17/06/2019

(Date)

Submission No: RM19.051

Please tick one of the following submission types regarding the application,
Do you:

- Support
- Neutral
- Oppose

Do you:

- Wish to be heard
- Not wish to be heard

in support of my/our submission.

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

- Yes
- No

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

Releasing raw sewage into fresh waterways is utterly ludicrous.

Which part of this idea seems intelligent to any smart or reasonable human being?
I strong oppose the suggested idea to release sewage into fresh water ways.

My/Our submission is *(the reasons for your views, use a separate sheet if necessary)*

Submission No: _____

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

Date submissions close: 5 pm Friday 12th July 2019

A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Otago Regional Council

Address for Otago Regional Council:

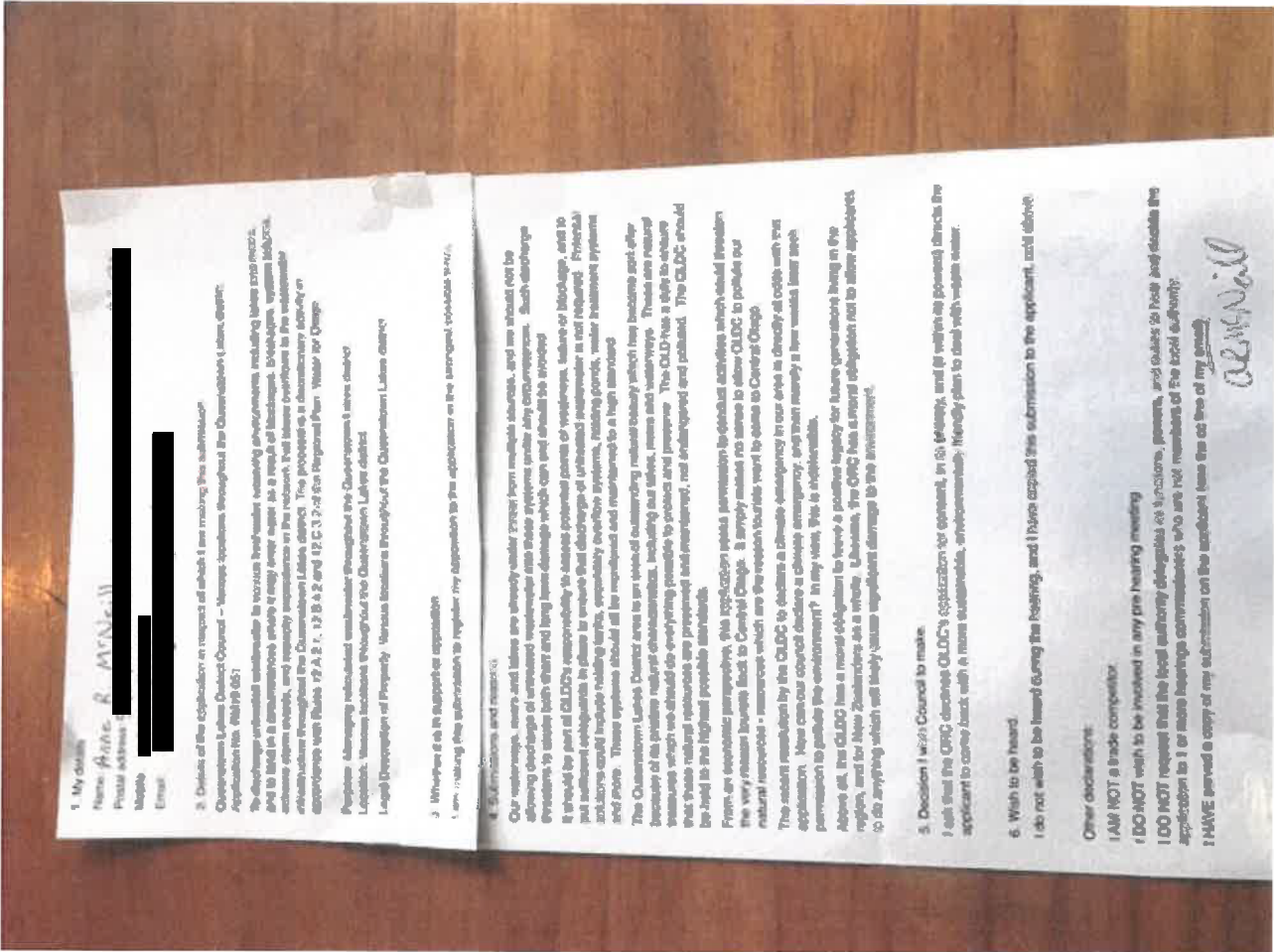
Otago Regional Council, Private Bag 1954, Dunedin, 9054
or by email to submissions@orc.govt.nz

Address for Applicant:

Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300
Or by email to alisha.robinson@beca.com

Karen Bagnall

From: Anne McNeill
Sent: Friday, 12 July 2019 2:00 p.m.
To: alisha.robinson@beca.com
Cc: Submissions
Subject: QLDC Application No RM19.051



Sent from my iPhone

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 Anthony Olsen

Full Postal Address: _____

Post Code: _____

Please provide your preferred contact phone number: _____

Email address: _____

I/ we wish to submit a **OPPOSE**
on the application of:

(choose one) submission

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)*

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of 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 proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

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).*

The maintenance and enhancement of water quality is a cornerstone of this submission.

This includes:

? To ensure wastewater management systems are suitably designed, located, installed and maintained, and have regard to cultural values;

? To ensure those systems consider the specific site constraints and site conditions when being designed and located

? To promote good practice in wastewater management systems and in the monitoring of existing systems

? To encourage natural or artificial wetlands as a means of managing any anthropogenic discharges

As described in the consent application, overflows in the Queenstown Lakes District occur at random, both in terms of frequency and location. These overflows are predominantly caused by blockages and breakages in the system.

It would appear that there is limited data surrounding the volume, frequency, location and duration of discharges.

Therefore the uncertainty associated with these potential discharges and the vulnerability of the associated receiving environments, may result in significant adverse effects on the environment.

To enable a full understanding of the nature of the actual and potential adverse effects on the environment, it is necessary that monitoring data is provided regarding overflow discharges in circumstances where they may or have already entered a surface water body.

The monitoring data must, as a minimum, demonstrate the frequency and location of previous discharges.

Land disposal of effluent to land over discharges to water is preferred and recognition of the importance of effluent treatment and disposal infrastructure.

For example any land application area must be located as far as practicable from any surface waterbody; and the land application system should be managed such that, the discharge of wastewater directly or via overland flow to a surface waterbody or coastal water is avoided.

My submission is that the discharge of human effluent to any surface water body should be a prohibited activity.

Where necessary to avoid, remedy or mitigate effects on the receiving environment, the applicant needs to ensure that wastewater management systems, including the consideration of measures to minimise waste quantities and

contaminants, are designed, located and installed to effectively treat and/or contain the contaminants present in wastewater.

In regards to municipal wastewater and stormwater network discharges, the extent of engineered overflow discharges from community sewerage schemes should be identified; and the schemes should ideally not overflow in other than

exceptional emergency situations, and certainly not under a blanket consent.

Water Quality

Public Water, Storm Water and Waste Water make up the three water bodies within the Queenstown Lakes District. The applicant needs to ensure that the discharge of wastewater directly or via overland flow to a surface waterbody or coastal water is avoided.

Submission No:

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

Remedies sought

1. Waste Water and Storm water discharge, where there is any likelihood of the discharge containing contaminants, should be a prohibited activity.
2. In the event of a unexpected and/or Emergency discharge from QLDC maintained waste water and storm water infrastructure, a predetermined "gateway test" must be in place applied.
3. The applicant must demonstrate how langata whenua values, such as mauri, outlined by Ngai Tahu will mitigated. This is not evident in the application. With no CIS being available at close of submissions, it is very difficult to provide for this is my submission. It is also not clear how hau kainga values are provided for where there is no guidance from Ngai Tahu.
4. The applicant has not evidenced any alternatives to deal with accidental discharge.
- 3.5.12 Discharge to Water: When assessing the alternatives to discharge to water, a range of values, including environmental, cultural and social, must be considered in addition to economic values.

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 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-Jul-19

(Date)

Submission

Queenstown Lakes District Council - RM19.051

The maintenance and enhancement of water quality is a cornerstone of this submission.

This includes:

- To ensure wastewater management systems are suitably designed, located, installed and maintained, and have regard to cultural values;
- To ensure those systems consider the specific site constraints and site conditions when being designed and located
- To promote good practice in wastewater management systems and in the monitoring of existing systems
- To encourage natural or artificial wetlands as a means of managing any anthropogenic discharges

As described in the consent application, overflows in the Queenstown Lakes District occur at random, both in terms of frequency and location. These overflows are predominantly caused by blockages and breakages in the system.

It would appear that there is limited data surrounding the volume, frequency, location and duration of discharges.

Therefore the uncertainty associated with these potential discharges and the vulnerability of the associated receiving environments, may result in significant adverse effects on the environment.

To enable a full understanding of the nature of the actual and potential adverse effects on the environment, it is necessary that monitoring data is provided regarding overflow discharges in circumstances where they may or have already entered a surface water body.

The monitoring data must, as a minimum, demonstrate the frequency and location of previous discharges.

Land disposal of effluent to land over discharges to water is preferred and recognition of the importance of effluent treatment and disposal infrastructure.

For example any land application area must be located as far as practicable from any surface waterbody; and the land application system should be managed such that, the discharge of wastewater directly or via overland flow to a surface waterbody or coastal water is avoided.

My submission is that the discharge of human effluent to any surface water body should be a prohibited activity.

Where necessary to avoid, remedy or mitigate effects on the receiving environment, the applicant needs to ensure that wastewater management systems, including the consideration of measures to minimise waste quantities and contaminants, are designed, located and installed to effectively treat and/or contain the contaminants present in wastewater.

In regards to municipal wastewater and stormwater network discharges, the extent of engineered overflow discharges from community sewerage schemes should be identified; and the schemes



should ideally not overflow in other than exceptional emergency situations, and certainly not under a blanket consent.

Water Quality

Drinking Water, Storm Water and Waste Water, make up the three waters. Policies relating to storm water and waste water discharges are considered by QLDC to be discretionary activities, this submission proposes that they should be prohibited activities, at least as regards the circumstances outlined in the consent application.

I submit that community wastewater scheme and storm water network discharges should not be exempt from any obligation to improve water quality where water quality is currently degraded.

Storm water discharges are generally more benign than discharges from community sewerage schemes and therefore applications for storm water network discharges should first have to first pass a non-complying activity 'gateway test'.

I submit that QLDC has an important role to play in achieving that outcome. In fact I submit that the construction of adequate overflow infrastructure should be a priority focus, instead of contaminated waste and storm water being permitted under certain circumstances.

Hazardous Waste

It is not apparent how the accidental discharge of hazardous waste can take place. The only situation could be via the unknown and inappropriate discharge of hazardous materials to landfill. In this situation, it should still be incumbent on the applicant to mitigate this discharge.

Cultural

Two significant rivers and two significant lakes located at Wanaka and Hawea are identified by Ngai Tahu as being significant. Mataau (Clutha River) and Paetarariki (Hawea River) along with Lakes Wanaka and Hawea are significant to Ngai Tahu, Ngati Mamoe and Waitaha. The Waitaha people have lived in these locations since C850AD. Waihakaata, the location of a traditional school of learning (Wharepurakau or Wanaka) was the original name of Wanaka township. The Cultural Values Statement submitted by Ngai Tahu does not reflect Ngai Tahu support or otherwise for the application. In consultation with other tangata whenua in Hawea and Wanaka there was unanimous support for me submitting in opposition to the application. However, any Ngai Tahu submission should be given primacy as they hold legislative weighting as to Statutory Acknowledgements and Deeds of Recognition in the district.

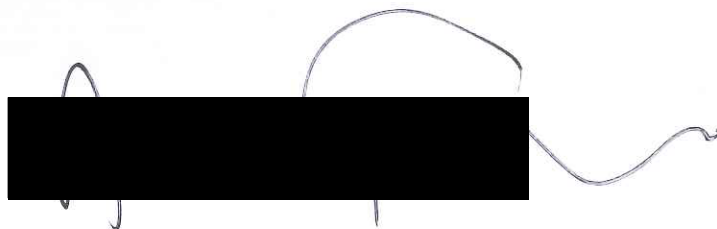
Remedies sought

1. Waste Water and Storm water discharge, where there is any likelihood of the discharge containing contaminants, should be a prohibited activity.



2. In the event of a unexpected and/or Emergency discharge from QLDC maintained waste water and storm water infrastructure, a predetermined "gateway test" must be in place applied.
3. The applicant must demonstrate how tangata whenua values, such as mauri, outlined by Ngai Tahu will mitigated. This is not evident in the application. With no CIS being available at close of submissions, it is very difficult to provide for this is my submission. It is also not clear how hau kainga values are provided for where there is no guidance from Ngai Tahu.
4. The applicant has not evidenced any alternatives to deal with accidental discharge.

3.5.12 Discharge to Water: When assessing the alternatives to discharge to water, a range of values, including environmental, cultural and social, must be considered in addition to economic values.





**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:

Submitter name: **Aotearoa Water Action Incorporated**

Postal address: c/- Niki Gladding, [REDACTED]

Contact phone: [REDACTED]

Email: aotearoawateraction@gmail.com

AWA is not a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991.

AWA wishes to make a submission in opposition to 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**

Aotearoa Water Action Inc. opposes Application RM19.051 in its entirety and requests that the Application be rejected.

Reasons for AWA's opposition:

1. **The significant values of the receiving environments** - The water bodies that could be affected by the proposed discharges include important environments for aquatic species, sensitive receiving environments, and water bodies that supply millions of people with drinking water each year. They also have significant cultural recreational and economic value for local communities and for all New Zealanders.
2. **Unlimited discharge volumes** - The Application as notified would allow Queenstown Lakes District Council (QLDC) to discharge unlimited volumes of untreated wastewater overflow (including human sewerage and hazardous waste) from its reticulated network to groundwater, lakes, streams and rivers in the Lakes District.
3. **Unlimited discharge frequency and duration** - The frequency and duration of wastewater overflow discharges is not limited by draft consent conditions.
4. **Consent term** - The term applied for is the maximum allowable under the RMA and does not force improvements in management that might lead to better environmental and human health outcomes.
5. **Unacceptable reasons for overflow discharges** - The consent would allow for overflow discharges relating to capacity exceedance in the wastewater reticulation network. Our position is that this removes the requirement to manage growth and development in line with the capacity of stormwater and wastewater networks.
6. **Insufficient information on which to base an AEE** - It is impossible to say that granting this consent will not put the environment and human health at risk. Individual discharges are not limited in terms of volume, frequency, duration or the nature and concentration of contaminants. There is also no limit on cumulative volumes within specified time periods. For these reasons, and because all water bodies have different physical characteristics, it is impossible to adequately assess the potential long and short term effects of the activity including effects on ecosystems, human health and recreation effects, visual effects, odour

effects and economic effects. Given the lack of information the Precautionary Principle should be applied. In addition, effects of low probability which will have a high potential impact must be considered including the effects of contaminating water supplies.

7. **Loss of an important enforcement tool** - AWA accepts that overflows from wastewater networks, and in particular from Gravity sewer systems, are unavoidable. However, the potential for enforcement and financial penalty remains a useful tool for ensuring these events are minimised in terms of scale, frequency and adverse effects. Granting this Application would render that enforcement tool ineffective.
8. **Consent for future waste water systems** - The Application seeks to include areas where it is anticipated QLDC will either develop a wastewater network or take over the ownership and / or management of existing private wastewater networks including: Kingston, Glenorchy, Cardrona, Hāwea Flat, Glendhu Bay, Luggate, Jacks Point and Village, Hanley Farms, Coneburn (industrial zoned area) and the Millbrook Resort area. New wastewater reticulation networks, particularly those that could affect sensitive receiving environments or drinking water supplies, should as far as possible have the potential for overflows designed out. Granting this consent would remove any need to ensure future wastewater system designs minimise overflow discharges.
9. **Lack of benefit** - The draft consent conditions do not require QLDC to improve upon existing network management. For example, there are no requirements to build capacity - into either the wastewater or stormwater networks - in line with growth and the reasonably predictable effects of Climate Change; there is no requirement to reduce the frequency of overflow discharges; nor is there a requirement to construct new engineered overflows that do not discharge directly to water. The positive effects stated in s 5.2 of the Application can be achieved by QLDC meeting its obligations under legislation.
10. **Loss of stewardship and kaitiaki rights (in terms of the ability to take legal action)** - Granting this consent will likely remove the ability of communities and individuals to take legal action against QLDC for overflow discharges.
11. **Potential to avoid new legislation and rules** – We are concerned that this Application might allow QLDC to avoid potentially tighter rules around urban discharges under both the proposed new NPSFM and the ORC’s proposed new strategy for urban discharges. Given the

physical scope of the Application and the term applied for, granting this application could significantly hinder efforts to protect and improve water quality in the Lakes District.

12. **Potential for perverse outcomes** - If discharge rules *are* strengthened as growth in the District continues, this consent could see QLDC preferring occasional capacity-related overflows from the network (to water) over significant upgrades to the capacity of treatment stations and associated discharges to land.

13. **Given the above, the Application is likely to be inconsistent with:**

- a. **The Resource Management Act** sections 5, 6(a)(c)(e) and (h), 7(a)(aa)(b)(c)(d)(f)(g)(h) and (i)
- b. **The National Policy Statement for Freshwater Management** including objectives and policies relating to Section A Water Quality; Section C Integrated Management; and Section CC Accounting for Freshwater Takes and Contaminants N.B. As the NPS has not been given specific effect to in the Otago Region's water plan, the NPS is directly relevant to this application
- c. **Water Conservation (Kawarau) Order 1997**

AWA does wish to be heard in support of this submission.

AWA requests pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

We also request that at least one commissioner be a Maori Commissioner.

Aotearoa Water Action Inc.

Dated 12 July 2019

Signed: (submitted electronically)

Submission No: _____

Submission Form 13

File No: RM19.051

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

Applicant Details:

Applicant: Queenstown Lakes District Council

Application No: RM19.051.01

Consent Type: Discharge Permit

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

Location: Various locations throughout the Queenstown Lakes district

Map reference: Various locations throughout the Queenstown Lakes district

Legal description: Various locations throughout the Queenstown Lakes district

Submitter Details: (please print clearly)

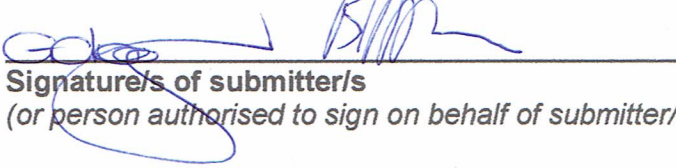
Full Name/s _____

Full Postal Address: _____

_____ Post Code: _____

- Work Ph: _____
- Home Ph: _____
- Mobile Ph: _____
- Email address: _____

(please tick your preferred Daytime contact number)


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

10/07/19
(Date)

Submission No: _____

Please tick one of the following submission types regarding the application,

Do you:

- Support
- Neutral
- Oppose

Do you:

- Wish to be heard
- Not wish to be heard

in support of my/our submission.

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

- Yes
- No

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

The disposal / dumping of wastewater into
our waterways

My/Our submission is *(the reasons for your views, use a separate sheet if necessary)*

As a residential + commercial owner and
ratepayers of the GLDC, we strongly oppose
the council discharging waste water into our
waterways. We cannot understand why the
developers responsible for the intensification
of our towns are not made to contribute more
to the infrastructure

Submission No: _____

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

We strongly oppose the dumping of wastewater into our waterways & therefore implore the GLDC take stronger action to ensure that the developers pay a greater levy to upgrade our infrastructure to guarantee this deplorable action does not happen!!

Date submissions close: 5 pm Friday 12th July 2019

A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Otago Regional Council

Address for Otago Regional Council:

Otago Regional Council, Private Bag 1954, Dunedin, 9054
or by email to submissions@orc.govt.nz

Address for Applicant:

Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300
Or by email to alisha.robinson@beca.com

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

Applicant Details: Belinda Egden

Applicant: Queenstown Lakes District Council

Application No: RM19.051.01

Consent Type: Discharge Permit

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

Location: Various locations throughout the Queenstown Lakes district

Map reference: Various locations throughout the Queenstown Lakes district

Legal description: Various locations throughout the Queenstown Lakes district

Submitter Details:

Full Name/s: Primary contact: Belinda Egden

Full Postal Address: Post Code: [REDACTED]

Mobile Ph: [REDACTED]

Email address: [REDACTED]

Signature/s of submitter:



Submission No:

Please tick one of the following submission types regarding the application:

Do you: Oppose Yes

Do you: Wish to be heard No

The specific parts of the application/s that this submission relates to are: that the consent not be allowed in its entirety due the fact it does not meet the requirements under the National Policy Statement for Freshwater Management (NPSFM) specifically in regard to:

Safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species.

Safe guarding the health of people who come into contact with the water.

National Policy Statement for Freshwater Management A. Water quality Objective A1 To safeguard: a) the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, of fresh water; and b) the health of people and communities, as affected by contact with fresh water; in sustainably managing the use and development of land, and of discharges of contaminants.

Maintaining or improving the overall quality of fresh water within a freshwater management unit.

National Policy Statement for Freshwater Management Objective A2 The overall quality of fresh water within a freshwater management unit is maintained or improved while: a) protecting the significant values of outstanding freshwater bodies; b) protecting the significant values of wetlands; and c) improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated.

Improving water quality so that it is suitable for primary contact more often .

National Policy Statement for Freshwater Management Objective A3 The quality of fresh water within a freshwater management unit is improved so it is suitable for primary contact more often, unless: a) regional targets established under Policy A6(b) have been achieved; or b) naturally occurring processes mean further improvement is not possible.

In the event that a consent is granted then it must contain clear and strict requirements for infrastructure upgrades to occur within defined time period of no longer than 10 years so that these discharges are reduced and eliminated. Any such consent granted must be short-term so that the effectiveness of these upgrades, and also the performance of ORC's compliance team in undertaking the necessary monitoring and enforcement, is reviewed once again in the public arena. Transparency and an accountable promise that both organisations QLDC AND ORC work together to work towards reducing spills to zero over a set and agreed time frame.

The reasons for this submission are:

ORC is responsible for safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species, as per the National Policy Statement for Freshwater Management (NPSFM).

ORC is responsible for safe guarding the health of people who come into contact with the water (NPSFM).

ORC is responsible for maintaining or improving the overall quality of fresh water within a freshwater management unit (NPSFM).

“The applicant, QLDC, has failed to demonstrate how ORC can possibly grant the consent sought whilst ensuring that ORC’s statutory obligations under the NPSFM are satisfied at all times”

Both ORC and QLDC, under section 6 (e), 7 (a) and 8 RMA, are responsible for recognising and providing for, having particular regard to, and taking into account both the principles of the Treaty of Waitangi and matters of importance to iwi. These values include but are not limited to:

Protecting the mauri of our waterways. Mauri is the life energy which binds and animates all things in the physical world. It is the force behind that which is manifested, the force that sparkles alive the waterways, the force of beat in the human pulse, the force that shines out through the native greenery. Discharging untreated water into waterways will diminish and degrade mauri.

To aid further understanding, a breakdown of the word mauri may help:

Ma = To be connected to, bound to, linked to, joined

Uri = Descendants. All things, seen and unseen

Protecting whakapapa. Whakapapa is the word for connections and relating. If the Enlightenment view is epitomised in ‘I think therefore I am’, the Māori understanding is ‘I relate therefore I am’. In this cultural context, whakapapa refers to the need to treasure relationships, including the human relationship with water.

Upholding our responsibility as Kaitiakitanga of the whenua. In a cultural context our role is guardian or protectors of the land, and our function is to understand the significant values of outstanding freshwater bodies and to improve the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated. Kaitiakitanga refers to our need to lead the conversation about conservation - as people, organisations and businesses, and collaborate on how we protect and enhance the mauri of this water.

Wahi taonga refers to places in the landscapes that are treasured and in need of acknowledgement and protection. This includes our Central Lakes waterways and lakes which are precious and unique to us.

It is understood that the drains in the Queenstown region have unique issues with high fat content (and blocking), and discharge from industry in to drains. This is a related concern to me, and I am requesting that:

More emphasis be placed on educating the public on what is NOT flushable or drainable. Our biological system, which is excellent, can only accept the 3 P’s- poo, pee, paper. Nothing else!

More stringent conditions are put in place in regards to households and industry discharge, including investment in more stringent monitoring of household and trade waste bylaw.

That no consent is granted unless it is for a very limited term, with stringent monitoring, and review provisions, and clear timelines within which QLDC must upgrade infrastructure so that these discharges are reduced and eliminated within a very clear timeframe.

I am concerned that ORC will not provide adequate monitoring and enforcement of these discharges and the required upgrades unless it is clearly defined on the aforementioned short-term consent, so that it may be given priority in ORC's compliance monitoring programme. It is a fact that ORC embarked on an Urban Water Strategy in 2017. It was agreed by ORC (worked on in partnership with QLDC) but has not progressed into an actual plan. So as a result has no teeth. Unfortunately there have been additional delays in doing this with the new NPSFM being proposed and now the complete review of the Water Plan: Otago. However there are key points in here about needing to upgrade infrastructure, partnership etc etc. THIS MUST BE PRIORITISED if we seek outcomes of the overall quality of fresh water within a freshwater management units are to be maintained or improved.

Submission No:

I seek the following decision from the consent authority: that the consent not be allowed in its entirety due to the reasons above

From: [REDACTED]
To: [Karen Bagnall](mailto:karen.bagnall@orca.govt.nz); alisha.robinson@beca.com; [Submissions](#)
Subject: Re: Submission re RM19.051.01
Date: Friday, 12 July 2019 11:23:35 a.m.
Attachments: [image001.png](#)

Please see my responses highlighted in yellow below.

Cheers,
Bindy

On Fri, Jul 12, 2019 at 11:20 AM Karen Bagnall <karen.bagnall@orca.govt.nz> wrote:

Good morning – thank you for your submission – unfortunately there were a few things omitted – can you confirm the following;

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

I **do/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/have not** served a copy of my submission on the applicant.

Could please reply to the submission e-mail address as per your original submission.

Please note that submissions close at 5 pm on Friday 12 July 2019

Please do not hesitate to contact me should you have any questions.



Karen Bagnall

SENIOR CONSENTS SUPPORT OFFICER

Otago Regional Council

70 Stafford St
Private Bag 1954 Dunedin 9054

P (03) 474 0827 or 0800 474 082

karen.bagnall@orc.govt.nz
www.orc.govt.nz

Important Notice

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From: Bindy Egden <[REDACTED]>
Sent: Thursday, 11 July 2019 4:11 p.m.
To: alisha.robinson@beca.com; Submissions <Submissions@orc.govt.nz>
Subject: Submission re RM19.051.01

Please accept submission attached.

Regards,
Belinda Egden

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 Beverley Joyce Thomson

Full Postal Address: _____
_____ Post Code _____

Please provide your preferred contact phone number: _____

Email address: _____

I/ we wish to submit a **SUPPORT** / **OPPOSE** / **NEUTRAL** (circle 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)

Discharge of untreated waster water into various freshwater environments
The length of time of the permission – 35 years

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).

Discharge of untreated wastewater into our lakes and rivers, is unhealthy for people and our native biodiversity.
It is bad for our image as a clean green country thus effecting tourism
Its incredibly out of date as a wastewater system
I suggest that you invest in a review by experts and a state of the art system |
suggest a consent of 3 years which should be enough time to sort this out.

Submission No: _____

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

Refusal of permission to discharge untreated waste water
At the most a 3 year permission with a requirement to solve the problem _____

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/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.*

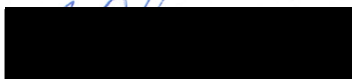
I, **am/am not** (choose one) directly affected by an effect as a result of the proposed activity in the application that:

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

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

I **do/do not** ^{not sure} 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/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)

20 July 2019

(Date)

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 bill and Kirsty Sharpe

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)*

whole 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).*

Oppose. This is not acceptable in this day and age when we are as a country determined to preserve water quality especially in our area where the lakes and rivers are of utmost importance to all but especially the tourist industry. Local authorities demand high standards of those applying to them for resource consents and they themselves should be exhibiting these high standards. The infrastructure should be of a standard to cope with high demand. Exception should be only in the event of an extreme weather condition or earthquake.

Submission No:

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

Refusal of consent.

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

I _____ 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 _____ 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)

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

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

From: [Kirsty Sharpe](#)
To: [Karen Bagnall](#)
Subject: Re: Queenstown Lakes District Council - Publicly Notified Application RM19.051
Date: Thursday, 18 July 2019 8:56:29 p.m.
Attachments: [image003.png](#)

Dear Karen

Sorry for the delay in reply have been busy with school holidays.

I thought I had indicated these things on the submission form however as I obviously did not here is my response.

We do not wish to be heard in support of our submission.

We are not a trade competitor of the applicant. We are members of the public and rate payers of QLDC.

We do not wish to be involved in any pre hearing meeting.

We do not have an opinion as to whether the ORC delegates its authority to hear the application to independent commissioners. We feel this is a matter for the ORC to decide.

We have served a copy of our submission to the applicant.

Kind regards

Kirsty and Bill Sharpe

On Wed, Jul 17, 2019 at 12:24 PM Karen Bagnall <karen.bagnall@orc.govt.nz> wrote:

Good afternoon – thank you for your submission – unfortunately there were a few things omitted – can you confirm the following;

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

I **do/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/have not** served a copy of my submission on the applicant.

Could please reply to the submission e-mail address as per your original submission.

Please do not hesitate to contact me should you have any questions.

Regards



Karen Bagnall

SENIOR CONSENTS SUPPORT OFFICER

Otago Regional Council

70 Stafford St
Private Bag 1954 Dunedin 9054

P (03) 474 0827 or 0800 474 082

karen.bagnall@orc.govt.nz
www.orc.govt.nz

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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 Brad Gould

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)

Polluting this special part of the country/world

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).

to Oppose the above Application. My reason is that
I do NOT accept the QLDC's idea that under the above
conditions "plan A" should be to dump the rubbish into our environment
untreated - surely, more effort + probably money (yes my rates + tax)
should be allocated to resolve an alternate Plan A reflecting
the regions draw-cards + the Nations claim to be "First World"

Submission No: _____

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

for ORC to decline QLDC Application to
Discharge untreated wastewater as per RM19.057.01

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/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.

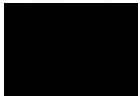
I, am/am not (choose one) directly affected by an effect as a result of the proposed activity in the application that:

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

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

I do/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/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)

10 JUL 19

(Date)