

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 Reid Mossman

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 Queenstown lakes District Council is striving for growth in Queenstown area and is pushing to increase demand on the infrastructure. With this planned growth they wish to discharge waste water as per their Purpose Application above, and pollute the areas of Queenstown and Wanaka Lakes and waterways and downstream instead of taking responsibility for the correct maintenance and operations of their infrastructure and take the principals of best practice for our pristine environment seriously.

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 strongly Oppose this entire application on the basis that waste should not come close in any circumstances to polluting any NZ waterways.

QTLDC needs to balance there books & Planning correctly with the amount of progress and growth and the infrastructure in place to adequately treat all waste.

Submission No:

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

I wish the ORC to decline the QTLDC application in Full and demand and continue to heavily fine the QTLDC for any breach of waste outside the treatment systems.
World best practice should be the first priority in dealing with our waste water. QTLDC should not be able to breach & should be looking for best practice for the environment and society in general.
I am a rate payer in Queenstown.

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.*

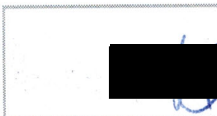
I, _____ (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- 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 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-20

(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

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 Richard Alan Dickson Flett, William David Smelley

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)

We object to the discharge of untreated wastewater to
land or water whether directly or indirectly

~~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 oppose the granting of this consent in any
way shape or form as this goes against this
Government's views and every New Zealanders

Submission No: _____

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

Not to grant this consent

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)

12-7-19

(Date)

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

Applicant Details: Richard and Ingrid Thomas

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: Richard Thomas

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

Karen Bagnall

From: Richard Thomas <[REDACTED]>
Sent: Friday, 12 July 2019 4:04 p.m.
To: alisha.robinson@beca.com; Submissions
Cc: Karen Bagnall
Subject: FW: Submission Opposing QLDC's Discharge Permit
Attachments: This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.pdf

Please see attached and below.

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/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 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.

Richard Thomas | Director



REDWULFF

CLARITY. DIRECTION. PURPOSE.

Level 3, 11 Church Street, Queenstown, 9300

M [REDACTED] **W** www.redwulff.co.nz

From: Richard Thomas
Sent: Thursday, 11 July 2019 3:23 p.m.
To: alisha.robinson@beca.com; submissions@orc.govt.nz
Subject: Submission Opposing QLDC's Discharge Permit

Please see attached.

Richard Thomas | Director

Submission No: 1

**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 MORGAN RICHARD WILLIAMS

Full Postal Address [REDACTED]

Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

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)

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 discharge of untreated waste water into Lake Wakatipu or any other waterway under any circumstances from urban or rural land

I find it unfair that a farmer is penalised for discharging untreated waste water into a water way; + an urban town can, + will not be penalised.

This not fair justice

If this consent is granted, the current Regional Council Members will not enjoy

Submission No: 1

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
- 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)

12-07-19.
(Date)

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

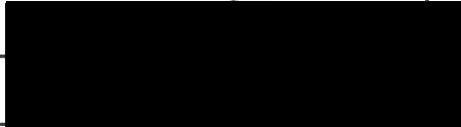
Map reference: Various locations throughout the Queenstown Lakes district

Legal description: Various locations throughout the Queenstown Lakes district

Submitter Details:

(please print clearly)

Full Name/s Richelle Courtney

Full Postal Address: 

Post Code: 

Work Ph: _____

Home Ph: _____

Mobile Ph: _____

Email address: 

(please tick your preferred Daytime contact number)



19/6/2019
(Date)

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

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)

- untreated wastewater discharge
- contamination of our freshwater systems
- potential for system breakdown & contamination
- groundwater stores being effected
- Lack of a treatment facility for wastewater

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

- health benefits (none)
- environmental benefits (none)
- long-term adversity and change to natural systems including deep groundwater supplies
- bacterial count in water systems downstream of waste-water release, eg dyde / Alexandria...

details,
discharge
land
receiv
to
before
area

Submission No: _____

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

No sewage/untreated wastewater be discharged to any freshwater receiving environments or land where the catchment areas close to a freshwater receiving environment. All untreated wastewater to be treated by a treatment plant/facility before being discharged onto non-catchment areas.

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

From: [REDACTED]
To: [Submissions](#)
Subject: Fwd: Notified Application by Queenstown Lakes District Council RM19.051
Date: Friday, 21 June 2019 1:36:04 p.m.
Attachments: [image002.png](#)

No I am not a trade competitor to the proposal.
Yes independent deciders.

Is that what you wanted to finalise the submission?

Richelle Courtney

Begin forwarded message:

From: Karen Bagnall <karen.bagnall@orc.govt.nz>
Date: 21 June 2019 at 9:18:13 AM AEST
Subject: Notified Application by Queenstown Lakes District Council RM19.051

Good morning – thank you for your submission on the above notified application.
Unfortunately the original submission form supplied by Council omitted the following details;

I am a trade competitor to the proposal

- Yes
- No

Pursuant to section 100A of the Resource Management Act 1991:

I request that you delegate your functions, powers, and duties required to hear and decide the application to 1 or more hearings commissioners who are not elected members of the Council Yes No (tick one)

Notes to Submitter:

Electronic Submissions: A signature is not required if you make your submission by electronic means. Submissions can be made to submissions@orc.govt.nz

-
Privacy: Please note that submissions are public. Your name, contact details and submission will be included in papers that are available to the media and the public, **including publication on the Council website.** You may request your contact details be withheld. Your submission will only be used for the purpose of the notified resource consent process.

-
Independent Commissioner If you make a request under section 100A of the Resource Management Act 1991, for independent commissioner/s you must do so in writing no later than 5 working days after the close of submissions and you will be liable to meet or contribute to the costs of the hearings commissioner/s.

To constitute a full submission the above information should be provided to Council by close of submissions 5pm Friday 12 July 2019.

Please forward this information to submissions@orc.govt.nz

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

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

Important Notice

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Karen Bagnall

From: Riki Young <[REDACTED]>
Sent: Thursday, 11 July 2019 10:35 p.m.
To: Submissions
Cc: alisha.robinson@beca.com
Subject: File 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: Riki Young

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

As New Zealanders we pride ourselves and even at a national level advertise our clean green image "Pure NZ". Our waterways, rivers and lakes are already under threat from multiple sources, we have groups/people who are currently working on protecting and preserving this 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. 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?

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. They should be looking at fixing the problem not creating more. When the council approve a new subdivision they should be working with the developers that their wastewater infrastructure management plan is sufficient before granting consent instead of putting more pressure on what we currently have as it is not coping.

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 QLDC has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted.

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. We should be able to swim in our waterways without getting sick. Keep NZ clean and green!

5. Decision I wish Council to make.

I ask that the ORC declines QLDC's application for consent, in its entirety, and directs the applicant to fixing the problem 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.

Karen Bagnall

From: Riki Young [REDACTED]
Sent: Wednesday, 17 July 2019 1:03 p.m.
To: Karen Bagnall
Subject: Re: Queenstown Lakes District Council - Publicly Notified Application RM19.051

Thank you. I have now answered the below questions as required.

Riki

On Wed, 17 Jul 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:

- 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.

- 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** 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.

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

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

Submission No:

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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 Robert & Elizabeth Knox

Full Postal Address [REDACTED]
[REDACTED]
[REDACTED] Post Co [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)*

Discharge untreated wastewater to freshwater.
Tenure of the consent.

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 oppose the application as it is presented.
In this day and age it is not acceptable to have a plan B that seeks to allow untreated wastewater to be flushed into water courses. The QLDC must make it a priority to manage its waste in line with best global practice.
We believe that allowing a 35 year consent does not provide a strong incentive to prioritise the building of better infrastructure that will reduce environmental impact.

Submission No:

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

We may support an approach which allowed a consent but not for 35 years. The council should provide a details of how they plan to upgrade their infrastructure, the time frames for the upgrades so discharges to freshwater do not happen. Any consent should be staged to ensure the council must progress the upgrade as planned or the consent will lapse.

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.



Robert L
Knox

Digitally signed by Robert
L Knox
Date: 2019.07.10
19:57:14 +12'00'

10-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](#).

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

Submission No: _____

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

Page 1 of 4

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

Submitter Details:) ***Please ignore my previous attempt to submit my submission 'on-line'. Dated 11/07/2019.***

Full Name/s **Robert Douglas Galvin**

Dated; **12/07/2019**

Full Postal Address: [REDACTED]

Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

I/ we wish to submit an ' **OPPOSE**' 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:

QLDC's intention to continue discharging its sporadic sewage and untreated wastewater directly or indirectly into the Kawarau River.

My/Our submission is;

I oppose QLDC's application in full.

Reason 1;The QLDC sewage treatment plant and related infrastructure, despite recent upgrades, clearly seems unfit for purpose, and the convenient solution has historically been, and according to this application still intends to be, to discharge waste water and sewage to river, whenever the system comes under regular and predictable pressure, for which it seems the system was not appropriately designed.

The word "insanity" comes to mind, where QLDC considers it acceptable in this day and age to expect the down-stream Environment, and populations particularly of Bannockburn and Cromwell to bear the 'brunt' of this deeply flawed waste management strategy, so that QLDC, Air NZ, and tourism related interests can be free to pursue their objectives of limitless, irresponsible growth within this pristine part of the New Zealand.

Hopefully I am wrong, but this has the appearance of uncoordinated, ideological 'silo thinking'. This state of Queenstown needs to be seriously addressed before Queenstown ends up not unlike many other famous international tourist hotspots; - where the visitor '**experience**', the local quality of life, becomes utterly ruined.

Submission No: _____

Reason 2:

The Kawarau River at the point of exiting the Kawarau Gorge, just upstream from Bannockburn, is now a braided river. This is the result of the Clyde Dam slowing river flow, so that silt that is washed down as a result of erosion in upper Shotover river reaches drops and forms islands of silt.

This braided river, is characterised by numerous of these shifting islands of silt separated by changing channels. This braiding of the river over the last 12 years has visually spread approximately 4 km from the Gorge exit, into the Bannockburn Inlet, and down to Old Cromwell Town located at the junction of Kawarau and Clutha Rivers.

This part of the river then acts a little bit like a filter, thus slowing the river flow.

This in turn implies that as the flow slows, solids as well as introduced bacteria carried by the current, drop to the river bed along with the silt, or it accumulates on the edges of the river, and on and around those islands that have formed over recent years, as stated above.

This stretch of the river is still recreationally popular with families, boaties, skiers, kayakers, fishers, and people walking their dogs.

Some people within their property rights utilise river water for domestic purposes.

Some rural properties are permitted to take water for irrigation.

As evidenced by the level of recreational activity, few people are aware of QLDC's practice of discharging its waste water and sewage into the river within which they 'play' thus being exposed to potential health hazards.

The lack of public notification of sewage spill by QLDC, means the public cannot exercise the option of avoiding this flowing part of Lake Dunstan.

I/We seek the following decision from the consent authority

- 1 *That ORC not grant consent to QLDC to discharge waste water and sewage [treated or untreated] directly or indirectly into the Kawarau River, regardless of the emergency, the historical and predicted incidences which seem to be occurring on average bi-monthly, as if 'normality' .*
- 2 *I could be persuaded to accept the ORC granting temporary consent but only subject to the following conditions being imposed and monitored:*
 - A/ *Limited discharge permitted only during winter months, subject to QLDC immediately modifying both the treatment plant, and the holding ponds;*
 - *where the design is appropriate to the district's 50 year aspirations for growth,*
 - *where the design is appropriate to the alpine nature of weather events,*
 - *where plant is designed to deal with all blockage issues, cognisant of the fact that many travellers and many locals treat the toilet as a kitchen waste disposal unit,*
 - B/ *Any discharge into the river, must be advertised immediately over local radios, social media, and the next editions of local news publications.*
 - C/ *Sampling of waters before, during and after discharge to be carried out independently reporting findings to ORC, CODC and QLDC, to be paid for by QLDC.*

Submission No: _____

I/we 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.

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

I, **am** 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** wish to be involved in any pre-hearing meeting that may be held for this application.

I **do** agree should the local authority delegates its functions, powers, and duties to hear and decide the application to **2** or more hearings commissioners who are not members of the local authority.

I **have** served a copy of my submission on the applicant.

Robert D. Galvin

12/07/2019

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.

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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

Submission close at 5 pm on Friday 12 July 2019

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 Robert John Wilson

Full Postal Address:

[Redacted]
[Redacted] Phone: 9310

Please provide your preferred contact phone number:

[Redacted]
[Redacted]

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)

The application to discharge untreated water into any lakes or rivers within the Lakes District being that Clutha Mangia or Waiatapu I Firmly object

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 Firmly object to and oppose the Q.L.D.C. Discharging and dispose waste water into Disposed lakes/lakes, waiatapu, shotover or Kawerau lakes

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

Decline this application as I presented

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

- 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:

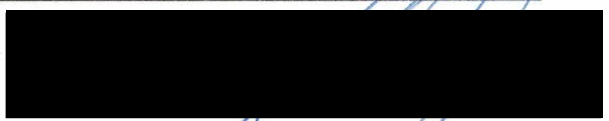
- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

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.

Signatures of submitters (or person authorised to sign on behalf of submitters)



12-7-19 (Date)

Submission No: RM 19.051

**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 Robin Henry Maguire dicey & Margaret Lucy Dicey

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** / (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)*

Any discharge of untreated waste water into any freshwater receiving environments
Throughout the Queenstown Lakes district

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).*

That QLDC be obliged to install the infrastructure required to prevent any waste water discharge into any lake or river

Submission No: RM 19.051

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

The consent authority should require the QLDC to NOT allow any untreated water into the lake or river by investing in sufficient infrastructure

I/we:

- 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

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.

12 July 2019_____

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

(Date)

Submission No: __RM 19.051_____

Notes to the submitter

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Submission close at 5 pm on Friday 12 July 2019