Appendix 3

Comment on Proposed Draft Conditions Received on 24 September 2019

p, q	ed n	Purpose of Condition	Proposed Draft Condition	ORC Response
Lodged	Updated Condition No	As lodged black text	As lodged black text	
Conc	Up Cond	Changes from lodged version	Changes from lodged version	
	• , ,	in red text and strikethrough	shown in red text and strikethrough	
-	strative Cor	nditions		
		It is expected that ORC will have a standard "in general accordance with the application material" condition. However, this resource consent is slightly different to typical consents because something that already occurs is being consented, and the conditions are key to the ongoing management of adverse effects. Therefore an "except as modified by the condition below" is requested to be included in this condition as this stipulates that the conditions, where different or advancing something beyond the application documentation, take precedent. Physical response chart lodged with application removed from this condition as replaced by the Wastewater Overflow Response Procedure in Condition 8 and 9 below.	In General Accordance Except as modified by the conditions below, the Wastewater Network Overflow Discharge Consent shall be undertaken in general accordance with the information provided by the Consent Holder, Queenstown Lakes District Council (QLDC), being: a) The Assessment of Environmental Effects prepared by Beca Ltd dated 5 April 2019 b) The Physical Response Flow Chart (attached to these conditions as Attachment 1) c) The ecological assessment prepared by Ryder Consultants Ltd d) The public health assessment prepared by NIWA e) The Cultural Impact Statement received from Aukaha dated May 2019 on behalf of the relevant Kāi Tahu rūnanga	The intent of this condition is reasonable and appropriate. This ensures that the consent authorises only the activity as applied for. If the panel were of the opinion to grant the consent, it is recommended that this condition is modified to the following: The discharge authorised by this consent must only be overflow of wastewater as described in the discharge permit application lodged with the Consent Authority on 8 April 2019 and subsequent amendments made to the application on 5 June 2019 and 13 September 2019. If there are any inconsistencies between the application and this consent, the conditions of consent shall prevail. While this achieves the same intent, the wording is preferred as it provides further clarity.
2	2	Describes what is authorised by the	Physical Scope of Network Consent	This condition restricts the locations that the

resource consent so that the application material does not need to be referred back to and is clear for compliance monitoring purposes for both ORC and QLDC.

The assessment of environmental effects undertaken for this application has assessed the receiving environment for all the areas listed, including those areas that are not currently under the ownership and / or management of QLDC. Note that Fernhill / Sunshine Bay and Kelvin Heights, now added for clarity purposes only to the condition given the other Queenstown areas named, were included in the lodged application and assessments. This inclusion is not an increase in consent scope. The proposed conditions set out below seek to manage the adverse effects of overflows through physical response procedures that apply no matter the location / waterbody, and through improvements to the wastewater network over time.

Ongoing improvements to wastewater systems technology is envisaged to assist in reducing the likelihood that overflows will occur from new manholes and pump stations.

This Network Consent authorises wastewater overflow discharges from the following:

- At the time of consent approval QLDC owned and/or operated managed wastewater collection networks (including existing and new manholes, pump stations, engineered overflow points, and pipes):
 - Queenstown including Arthurs Point, Fernhill
 / Sunshine Bay, Frankton, Kelvin
 Heights, Shotover
 Country and Lakes
 Hayes Estate, Lake
 Hayes, and
 Arrowtown;
 - Wanaka and Albert Town;
 - Lake Hāwea;
 - Luggate (part); and
 - Cardrona township (part).
- b) Future Wastewater collection networks areas (including manholes, pumpstations, engineered overflow points, and pipes) which at the time of consent approval either do not exist, or are notcurrently owned and/or operated managed by QLDC, but have the potential to be in the future, including but not limited to the following areas(including existing and new manholes, pump stations, engineered overflow points, and pipes):
 - □ Kingston;
 - Glenorchy;

discharge can occur from, to reflect what has been outlined in the application. Though condition 2b) has been amended the condition however still lacks certainty and clarity. If the panel where of the opinion to grant the consent, it is recommended that this condition is modified to the following:

The discharge authorised by this consent must only be wastewater that has overflowed from the wastewater collection networks as shown in Appendix I of this consent.

Appendix I would contain maps to indicate accurate locations of the wastewater collection networks.

As a matter of clarity, a definition should also be outlined in the advice notes of the consent for 'wastewater collection networks'.

			Cardrona; Hāwea Flat; Glendhu Bay; Luggate; Jacks Point and Village; Hanley Farms; Coneburn (industrial zoned area and special housing area); and Millbrook Resort area. Refer to Condition 10 13 for the timing of when these future areas will be subject to the conditions of this consent. For clarity this Network Consent does not authorise wastewater discharges from wastewater treatment plants.	
3	3	A general condition to allow monitoring and inspections of the network by the consenting authority.	Access QLDC shall enable ensure that access to relevant parts of the wastewater network is available at all reasonable times to the Otago Regional Council or its agents for the purpose of carrying out inspections, surveys, investigations, tests, measurements and to take samples.	This condition is reasonable and appropriate.
4	4	To ensure that a robust record of overflows (and relevant information relating to them) is kept by QLDC going forward. This will assist it to meet its reporting obligations to ORC under this consent and will built up a history of overflow data allowing easy identification of where repeat overflows are occurring in the same area of the network. Note deletions in this condition are because the information is captured under another bullet point already in the condition or in the Wastewater Overflow Response Procedure (see condition 8)	Maintain Records on Overflows QLDC shall maintain a record of wastewater overflows that reach water or have the potential to reach water. This record shall include: a) The specific location the overflow occurred; b) The approximate start time and end time of the overflow if this is known or can be estimated c) The day and time the overflow was notified to QLDC (and then or its operations and maintenance contractors if relevant) d) The time that the respondent person(s) was onsite at it took from being notified about the overflow to	This condition would require recording of the discharges. This will help to inform on the location and duration of the discharges. Generally, this condition is appropriate. It is noted that no water quality monitoring has been proposed or recording the volume of the discharges. Without this information the effect of each discharge remains relatively unknown. For instance, an overflow could occur for only short period but be of a significant volume; equally a discharge could occur over an extended period of time at a very low

reaching the overflow location e) The day and time that the overflow was stopped f) The approximate flow rate and the total volume of the and the total volume of the such as 'approximate' or the conditions use term such as 'approximate' or the conditions do not provide certainty. For instance, a number of the conditions use term such as 'approximate' or the conditions do not provide certainty. For instance, a number of the conditions use term such as 'approximate' or the conditions do not provide certainty.
e) The day and time that the overflow was stopped f) The approximate flow rate and the total volume of the conditions use term
overflow was stopped f) The approximate flow rate and the total volume of the conditions use term
f) The approximate flow rate and the total volume of the
and the total volume of the
Citing as anniversal a
wastewater discharged if 'if this can be
this can be ascertained or determined'. This sort of
estimated wording could result in
g) Whether If the overflow inaccurate data being
reached a waterbody or if collected.
it only had the potential to
reach a waterbody
h) What Where an If the panel were of the
overflow has reached a opinion to grant the consent and subject to
waterbody, actions were this condition, it is
taken by the responding recommended that the
person(s) to physically condition is updated to
clean up the overflow at provide further certainty
the site including (removing any non-
stopping the overflow, additional requirements
cleaning up spilled are added to record the
material clearing the volume and the quality
blockage, and repairing of the discharge.
any breakages
i) Why tThe cause of the overflow occurred if this can be determined .
be determined
j) What other actions were
taken, if necessary, in
terms of maintenance,
remedial works or
renewal to fix the reason
underlying cause of why
the overflow occurred
k) Whenther the Otago
Regional Council, and the
Ministry of Health, and Kāi
Tahu were notified of the
overflow and the date that
this occurred
This record shall be available, on
request, to the Regulatory / Consenting Manager, Otago Regional Council.
2 I apoing of consent
lance if it is not given
effect to within 5 years
reflect that the Resource Management Act (or earlier if required by
consent is authorising an this consent shall have no conditions of consent) conditions of consent)
activity that is already lapsing date as it has been its commencement. The
occurring, as opposed to given effect to immediately wording of this is not a fully new activity upon the consent being appropriate as a
a fully new activity upon the consent being appropriate as a consent condition.
immediately. granted. Giving effect' would be
1 minediately. 4

6	6	Therefore, this condition provides confirmation that the consent has been given effect to at the time it was approved. Theoretically the consent would otherwise not be given effect to until an overflow discharge occurred (which is unknown when this might occur).	Duration of Consent	undertaking the activity (discharging) and therefore the consent would only be given effect to once the first discharge occurs, which is contrary to what the condition states. The intent of the condition is to ensure that the consent does not lapse should a discharge not occur within the first 5 years. This is reasonable. If the panel are of the opinion to grant the consent, it is recommended that the condition be reworded to the following: For the purposes of Section 125 of the Resource Management Act 1991, this consent shall not lapse. A discussion regarding
0	O	out in section 1.5 of the AEE. QLDC evidence will contain further justification for the proposed duration of consent.	The duration of this consent in accordance with section 123 of the Resource Management Act 1991 shall be 35 years.	the duration is provided in Section 9.6 of this report.
7	7	QLDC is accepting of a review condition being imposed on this consent, particularly given the given the 35-year consent duration being sought. The timing for review suggested is to line up with the Annual Monitoring Report process.	Review of Consent Conditions The Otago Regional Council, under section 128 of the Resource Management Act, may within 3 months of the Annual Monitoring Report being provided in accordance with condition 10 13 serve notice on QLDC of its intention to review the conditions of this consent for the purpose of reviewing the effectiveness of these conditions in avoiding, remedying or mitigating any adverse effects on the environment resulting from the wastewater overflows authorised by this consent. The review of conditions shall allow for: a) Deletion or amendment to any condition(s) of this consent to ensure	This review clause would enable the Consent Authority to review the consent should any unforeseen adverse effect occur. It is noted that unforeseen does not include uncertain effect. A review clause of this nature is appropriate, particularly for a consent with a long duration. If the panel were of the opinion to grant the consent subject to this condition, it is recommended that the condition is amended to the following: The Consent Authority may, in accordance with Sections 128 and 129 of the Resource Management Act 1991, serve notice on the consent holder of its

		b)	that any adverse effects are appropriately avoided, remedied or mitigated; and / or Addition of new condition(s) as necessary to avoid, remedy or mitigate any unforeseen adverse effects on the environment.	intention to review the conditions of this consent within three months of each anniversary of the commencement of this consent, for the purpose of: (a) determining whether the conditions of this consent are adequate to deal with any adverse effect on the environment which may arise from the exercise of the consent and which it is appropriate to deal with at a later stage, or which become evident after the date of commencement of the consent; and (b) Ensuring the conditions of this consent are consistent with any National Environmental Standards, Regulations and/or relevant plans. These changes ensure the condition includes the correct references and provides sufficient scope of a review. The addition of condition (b) also enable a review to ensure consistency with future environment standards, regulations
Physical Respons	L e Conditions			or plans.
- 8	A draft Wastewater Overflow Response Procedure is to be attached to QLDC evidence. This condition provides for a finalised version to be completed within 2 months of the Consent decision to enable that any changes to the contents of this procedure determined through the Hearing process can be reflected. The specific wording of	QI Wa Re ou of	astewater Overflow sponse Procedure LDC shall prepare a astewater Overflow sponse Procedure which sets the procedures in the event a wastewater overflow. It all include: How QLDC is notified of an overflow; What authorities are to be notified of a wastewater overflow event (including those parties listed in	This condition is reasonable and appropriate as it adds certainty as to how the applicant will respond to an event. Condition 8(f) states that trigger points for a review/investigation process is if there has previously been repeat overflows occurring at the same asset, or in the same immediate area.

this condition is subject to change because the Wastewater Overflow Response Procedure is currently being drafted and the condition should reflect the final contents. The draft Wastewater Overflow Response Procedure is being prepared with input from Neale Hudson (NIWA), QLDCs public health expert for this project. As part of the QLDC response to the first section 92 further information request, the following wording was provided as a potential condition reflecting an update and expansion to the incident response flow chart included as part of the application lodged:

An updated incident response procedure document shall be prepared by QLDC and issued to its wastewater network operations and maintenance contractors within 6 months of consent being granted. A copy of the incident response procedure along with confirmation of its issue to contractors shall be provided to the ORC for its information within 48 hours (Monday – Friday) of issue to QLDC contractors. The incident response procedure shall: a) include the existing incident response process and be updated to refer to Section H of the MfE Microbiological Water **Quality Guidelines for**

Recreational Water; and

- condition 4 of this consent);
- wastewater
 overflow is to be
 cleaned up,
 including when it is
 appropriate to
 check underwater
 areas where there is
 a potential for
 wastewater or
 solids to build up;
- d) Where an overflow appears to have reached surface water, a sampling protocol for the collection of water samples;
- e) The format and content for an Incident Report;
- f) Trigger points for a review/investigation process e.g. if there has previously been repeat overflows occurring at the same asset, or in the same immediate area;
- g) If an investigation is triggered in (f) above, the review process to be undertaken to ascertain the underlying cause and recommend potential remediation if required;
- h) How lessons learnt from each overflow incident are to be conducted, including timeframes, and how any lessons learnt are to be implemented and then monitored going forward; and
- i) A copy of these consent conditions as an appendix.

A finalised version of the Wastewater Overflow Response Procedure (the Procedure) shall be prepared by QLDC and issued to its wastewater network However, a review/investigation should occur after every discharge event e.g.

f) Trigger points for a review/ investigation process will be any wastewater overflow discharge.

		b) require contractors to respond to each overflow with flexibility as recommend by the NIWA Wastewater overflow discharge consent – Queenstown Lakes District Council Microbial Risk Assessment dated April 2019 submitted with the application. The condition included in the right hand column reflects further extensive changes to capture more fully what this document will contain. The reference to the requirements under	operations and maintenance contractors within 2 months of consent being granted. A copy of the Procedure along with confirmation of its issue to contractors shall be provided to the Otago Regional Council for its information within 5 working days of issue to QLDC contractors. The Procedure will be reviewed at least every three years after the issue of the previous version in order to ensure latest best practice is incorporated where practicable. Updated versions of the	
		Section H of MFE Microbiological Water	Procedure will be provided to ORC within 5 working	
		Quality Guidelines for	days of issue to QLDC	
		Recreational Water has	wastewater network	
		been removed as a specific reference as the document is inherently reflective of these requirements	operations and maintenance contractors.	
8	9	This condition has now	Responding to a	This condition is
		been altered to reflect the	Wastewater Overflow	reasonable and
		introduction of condition	covered under this	appropriate as
		8 above and the development of the more	Consent Notification of Wastewater Overflows	Council should be advised of
		detailed Wastewater	wastewater Overhows	any discharge
		Overflow Response	Once QLDC is notified of a	as soon as
		Procedure.	wastewater overflow authorised-	practicable.
		Parties that need to be	under this consent, it shall	
		notified when an overflow	respond to the overflow in general accordance with the	The results of
		has occurred are specified in this condition so that	process set out in the flow chart-	sampling obtained under
		they are not just hidden	in Attachment 1 to these	condition 8 (d)
		away in the Wastewater	conditions.	should be
		Overflow Procedure		provided to the
		Response.	As part of responding to an overflow authorised	Council as soon
		Note we have contacted Kāi Tahu to find out	under this consent the	as practicable
		from them how and	QLDC shall notify Otago	after the results
		when they would like to	Regional Council and the	are received.
		be notified of an	Ministry of Health as	

Ongoing 9	10	ity riwatchess		
Ongoing	r ("Ommiini	LV CV WALKINGSS		
	<u> </u>	ity Awareness		<u> </u>
		documentation		
		the consent application		
		the need to refer back to		
		Attachment 1 to remove		
		these conditions as-		
		of the AEE be attached to		
		flow chart in Appendix B		
		It is recommended that the		
		Monitoring Report to be provided to ORC.		
		included in the Annual Manitaring Papart to be		
		that this information be		
		Condition 13 also requires		
		ORC.		
		available upon request to-		
		the record keeping be		
		Condition 4 requires that		
		monitored by ORC.		
		provides that it can be		
		to an overflow and		
		undertaken in responding		
		what process was		
		detailed recording of		
		requires the more		
		the process undertaken. Condition 4 above		
		is a collated summary of		
		wording to reflect that this		
		included in the condition		
		general accordance are		
		consent, however it is preferred if the words in		
		response process to this		
		This condition ties that		
		and the environment.		
		effects on public health-		
		mitigate) any adverse-		
		(avoid, remedy or		
		to in order to manage		
		are physically responded		
		sets out how the overflows		
		Appendix B to the AEE		
		The flow chart included in-		
			incident.	
		submissions received.	hours of responding to the	
		request in the	notify Kāi Tahu within X	
		Kāi Tahu reflects a	this consent the QLDC shall	
		condition. Inclusion of	overflow authorised under	
		reflected in the	As part of responding to an	
		that this detail can be	soon as practicable.	
		overflow occurring so	soon as practicable.	

reason for overflows occurring relates to foreign objects being put down the wastewater network, QLDC recognises the importance of continuing its education and raising awareness to the community and visitors to the District.

Ongoing and regular education via a number of methods (media including social, Scuttlebutt, targeted meetings/communication with key parts of the community such as eating establishments, hotels, industrial premises, and local construction industry) will assist in reducing the likelihood of overflows occurring over time.

That the education is occurring can be monitored by ORC as the condition requires that the Annual Monitoring Report (Condition 10 13) includes the education initiatives that QLDC has undertaken throughout the previous year.

and raise awareness to throughout the community, including residents, the construction industry, food industry, and visitors to the District, on how the wastewater system should be used.

The methods (e.g. media, social media, newsletters, print material, meetings) QLDC may use to educate the community is not restricted under prescribed by this consent, but the following shall be covered in education content (in no particular order and not all to be covered in every education initiative):

- a) What should go down wastewater pipes i.e. only water, human waste, toilet paper, and soaps
- b) The implications of putting other things down the wastewater pipes for domestic and commercial connections (i.e. breakages and blockages potentially resulting in a wastewater overflow into the community environment)
- c) How construction material/debris should be properly disposed of
- d) The correct process for obtaining approved connections to the QLDC stormwater and wastewater networks and the importance of engaging appropriately qualified trades people
- e) What sort of trees to avoid planting in the vicinity of wastewater pipes

The education initiatives that QLDC has undertaken each year shall be included in As

ongoing education to members of the public on the correct use of the wastewater system. This education may result in a reduction in overflow events caused by inappropriate use of the wastewater system.

This condition is reasonable and appropriate.

The Education
Communications
Plan should be
provided as a standalone document to
avoid cluttering the
Annual Monitoring
Report

			part of the Annual Monitoring	
			Report provided to ORC Otago	
			Regional Council in	
			accordance with Condition 10	
			13 of this consent, an	
			Education Communications	
			Plan shall be prepared within 2	
			months of consent being	
			approved, and then annually,	
			setting out for the coming	
			financial year:	
			a) What education	
			activities are proposed with	
			construction, food and	
			tourism industries to relay	
			a) to d) above, and the	
			timing for these activities	
			through the year;	
			b) What wider	
			community education	
			activities are proposed to	
			relay a) to e) above, and	
			the timing for these	
			activities through the	
			year;	
			, , ,	
			c) Any other initiatives	
			Council is undertaking	
			through the improvement	
			of systems and / or	
			changes to, or	
			development of, bylaws	
			which will subsequently	
			assist in educating about	
			the correct use of the	
			wastewater network.	
			The Education Communications	
			Plan can be a standalone document or part of the Annual	
			Monitoring Report document.	
			2 1	
Netwo	ork Improv	ements		
-	11	Minimising adversa	Assessment of existing	This condition is
		Minimising adverse environmental effects	Assessment of existing wastewater network to	reasonable and
			minimise environmental	appropriate as Council should be
ļ				
		resulting from wastewater overflows from the	effects	advised of system

existing network through auditing the existing network to identify where preventative measures to reduce the likelihood of an overflow reaching water could be practicably implemented.

This condition has a cost implication requiring funding through the 10 year and Annual Plan process, the condition requires the QLDC to provide a timeline of when preventative measures will be implemented.

Within 12 months of this consent being granted the Consent holder shall undertake a review of its current wastewater network (excluding wastewater treatment plants), identifying where measures to prevent or minimise overflows reaching water could be practicably implemented. Preventative or minimisation measures could include, but are not limited to:

- a) Providing or increasing storage capacity;
- b) Providing standby generators at pump stations;
- c) Installing alarms which notify a potential problem in the network;
- d) Constructing overflow ponding areas or diversion flow paths which particularly direct or hold an overflow away from waterbodies or public places.

Before the end of the 13th calendar month following this consent being granted, the Consent Holder shall provide to the Otago Regional Council written communication that details:

- A summary of the methodology undertaken for the review of the network;
- b) The infrastructure locations where it is practicable to implement preventative measures, what these are, and the proposed timeframe

improvements.

There remains uncertainty with the Consent Holder reviewing its network and determining where it is not practicable or appropriate to undertake preventative maintenance.

This review should be undertaken by an independent party.

			for implementing them, and	
			if the implementation is	
			subject to funding	
			approvals via the public	
			consultation through the	
			long term plan process;	
			long term plan process,	
			c) The reasons why	
			preventative maintenance is	
			not appropriate or	
			practicable in any areas	
			identified as such through the audit process.	
_	12		the audit process.	This condition is
	12	Reducing adverse	Future Wastewater Networks	reasonable and
		environmental effects	under QLDC control	appropriate as further
		from wastewater	F4	systems should be constructed in such a
		overflows from future	Future wastewater networks	manner to minimise risk
		networks that QLDC	designed by QLDC shall be	of pollution.
		designs through applying	designed to the following	•
		design requirements that	requirements (as relevant at	Harriaga Harriaga a constru
		minimise the risk of an	each location):	However there remains uncertainty with the
		overflow reaching water.	W/L	Consent Holder
		This is in line with the	a) Where practicable	determining what is
		QLDC 30 year	wastewater pipes,	practicable and what is
		Infrastructure Plan which	manholes, and pump	not practicable.
		includes a statement	stations shall be located	All new infrastructure
		around moving critical	or designed such that	should be constructed
		infrastructure away from	any overflow occurs to	away from lakes and
		water.	land and not water;	rivers.
		water.	o Note: 'to land' is	
			satisfied if this is to a	
			storage tank,	
			ponding area, or	
			diversion flow path	
			which directs an	
			overflow away from	
			a waterbody or	
			public area	
			b) Pump stations shall be	
			designed with suitable	
			levels of	
			resilience/redundancy	
			including:	
			1) appropriate level of	
			emergency storage	
			capacity;	
			2) Redundancy in the	
			2) Redundancy in the configuration of pumps	
	I	<u> </u>	12	

			and pumped mains	
		c)	Where practicable	
			wastewater pipes,	
			manholes, and pump	
			stations are located	
			away from key	
			recreation areas on	
			lake and river banks;	
		J.	Where practicable	
		d)	wastewater pipes,	
			manholes, and pump	
			stations are not located in	
			proximity to community	
			drinking water takes	
			from lakes and rivers;	
			from taxes and fivers,	
		e)	Design capacity is to	
			allow for future	
			capacity required for	
			potential upstream	
			development, as zoned	
			in the district plan at	
			the time or as	
			reasonably	
			foreseeable;	
		f)	That the wastewater	
		1)	pipes, manholes, and	
			pump stations are easily	
			accessible by personnel	
			and vehicles responding	
			to an overflow event;	
		g)	That any visual screening	
			of pump stations does not	
			outweigh the need to	
			prevent overflows from	
			reaching water;	
		h)	Mitigation measures,	
			where practicable, to	
			prevent overflows	
			reaching water from	
			below ground	
			infrastructure that is	
			located within a high	
			water table area;	
	l.			

			 i) Applicable wastewater infrastructure will conform to QLDC's Subdivision code of practice (based on NZS 4404); and j) All pipelines are constructed to the appropriate NZ Standard (NZS 2566 Buried Flexible Pipelines). 	
10	13	This condition is intended to provide ORC on an annual basis with the evidence that QLDC is: Physically responding to any wastewater overflow in accordance with required procedures Identifying through data collection any areas of the network that have had repeat overflows occurring in the same area of the network and the measures undertaken to fix these problems Carrying out ongoing education and raising awareness with the community including visitors to the District Making	Annual Monitoring Report QLDC shall prepare and submit an Annual Monitoring Report to the Regulatory / Consenting Manager, Otago Regional Council by 1 September each year. The report shall cover the previous financial year (1 July to 30 June) and provide, where required below, information for the current financial year. The Annual Monitoring Report shall include the following information (in no particular order): a) The data collected under Condition 4 of this consent; b) The Education Communications Plan required under condition 10 of this consent; c) A summary (including evidence) of the education initiatives undertaken by QLDC in accordance with Condition 10 of this consent for the previous financial year; and what education initiatives are planned for the current financial year;	This condition would ensure that Council's compliance unit is provided all necessary information to audit compliance with the consent. This condition requires reporting on wastewater capital investment works, the reporting should also include wastewater overflow mitigation works.

investments to improve the wastewater network to reduce the likelihood of overflows occurring over time

The 1 September timing for providing the Annual Monitoring Report to Council is to line up with Councils financial year, being 1 July to 30 June, allowing the months of July and August to prepare the report for the previous financial year as well as capturing investment information for the coming financial year.

Why 1 September is proposed as opposed to one month later (i.e. 1 August) is that this datelines up with QLDCs financial allocation systems for the coming financial year, whereby it will be confirmed what investments are being made to the wastewater network in the coming year.

- d) What work QLDC has undertaken in the previous financial year to reduce the likelihood of blockages to the wastewater pipes from tree root ingress, and what work it intends to undertake in regard to this matter in the current financial year;
- e) Confirmation of what wastewater networks are owned and / or operated managed by QLDC, including whether any of the future networks listed in Condition 2 of this consent are now owned and / or managed by QLDC and therefore are subject to the conditions of this consent for the current financial year;
 - o Note: QLDC shall notify ORC within 1 week that it has taken ownership and / or is operating a new part of the wastewater network to which these consent conditions will apply.
- f) Confirmation including evidence that QLDC has implemented a wastewater preventative inspection programme by CCTV or other technology, and how this was implemented in the previous financial year;
- g) A summary of any wastewater maintenance or

remedial works beyond
"business as usual operating
and maintaining the
network" implemented in
the previous financial year;
h) Whether any areas of
the network were
identified as having
repeat overflows and
what works were
undertaken to fix
these problem areas;
i) A summary of what
wastewater capital
investment works were
implemented in the
previous financial year;
j) Subsequent to the first
Annual Monitoring
Report a summary of
what wastewater capital
investment works were
programmed for the
previous financial year
did not get
implemented, the
reasons why, and what
was implemented
instead; and
k) What wastewater
capital investment
works are programmed
to be implemented in
the current financial
year.
, ca
For clarity the Annual
Monitoring Report does not need
to include information relating to
wastewater treatment plants in
the Queenstown Lakes District, unless in relation to capital works
investment where it would be
helpful as supporting evidence
to network improvements