

To: The General Manager, Environment Southland
Private Bag 90116, Invercargill
Can send by Email service@es.govt.nz

Date _____

Name of Submitter _____

Address _____

RE: Te Anau Waste Water Discharge Resource Consent Application 302625

Name of Applicant: Southland District Council

Location: Lot 2 DP 410687, at 1701 Te Anau Manapouri Hwy, Manapouri, Southland

File No. S122-012

/we strongly oppose this Consent Application, and our reasoning is as follows, in no particular order.

The lack of substance contained in the Application makes it difficult to form an informed decision for or against the applicant.

The corner stone of this Application should be the Operational Management and the Environmental Plans and Policies, as they will form the conditions by which consent operates. However, the aforementioned will not be drafted until SDC have consent to discharge treated effluent to land and effluent odour to air. The Application fails to include vital information that the public requires to make an informed submission.

1. There is no evidence of any baseline data compiled over two or three years of research of the Ecology, of the soil, or peat bog - that is to be sprayed with the treated sewage. A project of this scale and nature requires baseline data before it is commenced. Without baseline data how can effluent discharge effects on the environment be monitored?

2. There is no “firm” plan to control or mitigate effluent odour. There is no information as to the amount of odour, nor its effects on human health and quality of life. No information as the effects on the largely tourist based economy of the Manapouri Community.

3. The Manapouri Vision Statement includes objectives to make Manapouri a suitable place for holidaymakers, locals, and tourists. The community has invested heavily on improving Manapouri, and continues to spend a considerable sum on maintenance and beautification.

4. Will Manapouri investment have been in vain? Will quality of life and health be adversely affected? Will businesses fail, property values plummet, tourist income disappear? Will foul effluent smell drift over our homes, our town?

5. Manapouri will become a less desirable place to live. There is an admission of a “low risk of odour beyond the irrigation area” which indicates the applicant is not sure there will be an odor emanating from this discharge.

6. There is no indication as to the odor being constant or variable. Nor how it is to be treated and/or controlled. It is not disclosed what the exact effect will be of the sewage being in the pipeline for three or so days in during its 18 km transit from Te Anau.

7. Manapouri census figures show that the population increased from 240 to 306 in the 2001 - 2006 period. But has now fallen to 228 in 2013. A decline in population of 25.4%.

8. The threat of sewage discharge on the Kepler Block must be a contributing factor in this decline in population. Presently there are 30+ houses for sale in Manapouri and none are selling. If this scheme becomes a reality then the population decline will accelerate and house prices will fall further.

9. There are no assurances or guarantees of compensation in the event obnoxious odor affects our quality of life, our health, the value of our property. If there is no likelihood of odour in Manapouri then a written guarantee of compensation should be provided to the community.

10. How is the spray irrigation system to be monitored and controlled as regards surface water quantity and conditions in the spraying area?

11. If and when the land is flooded with rainwater, the irrigation system will require close monitoring to avoid treated effluent build up on the land.

12. Manapouri had its once in 50 year flood Nov 1982. Dec 1982 was also wetter than normal. Jan 1983 another once in 50 year flood occurred. Surface flooding occurred in a majority of fields around Manapouri during these events, including the land area covered by this consent application.

13. Road washouts Jan 1983 significantly affected Manapouri. There is a potential for the pipeline to be damaged, hence leakage of treated sewage.

14. The term of 35 years for this consent is an excessive. Progress in sewage treatment could markedly improve in that time.

15. Discharge pathways of surface water are not proven, only assumed for the benefit of this Application. In the documentation it states, *"The extent of the discharge zone cannot be accurately determined with the available information."* Why then, did researchers not progress further with investigations?

- **The Waiau River & Lake Manapouri are Statutory Acknowledgement areas** and are valued for swimming, boating, and fishing. The Kepler Mire is noted as a significant local habitat of indigenous fauna.
- **Cumulative adverse effects** on groundwater, drinking water, the contaminant pollution of the Waiau River, Lake Manapouri, and potentially the Kepler Mire and Home Creek - due to wastewater/effluent discharges.

16. Surface water discharges it is noted, can flow in altogether different directions: into Home Creek, Lake Manapouri, or into the Airport water bore.

17. Earthquakes there is no way of predicting how water flows will be affected, as the land levels in the Manapouri area are changing and probably be the same for any area in the Te Anau Basin.

18. Alternative options and locations exist farther away from populated areas than the option and location of this Consent Application, for discharge to land.

19. SCD history of Consent breaches has not been exemplary. The Te Anau Sewage Discharge Consent expired Sept 2004 but was granted a permit extension of ten years.

20. Current permit extension expires Sept 2014, before any replacement scheme will be in operation, therefore needing a further extension or be in breach of an already extended consent.

21. /we are aware the 18 km pipeline will not form part of this Consent. We believe Environment Southland should be involved in how this pipeline is to be constructed and maintained, and be involved in any plan to control a potential leak from the pipeline.

22. If the pipeline ruptures, a 20cm pipe with stop valves, but without non-return valves, could spill 9.7m litres of treated effluent (plus what is being pumped) into L.Te Anau, until the pump is stopped. Spill occurring near DOC office.

23. Until the pipeline is repaired, where would the treated sewage be diverted?

24. From 2005 the Manapouri community should have been included as a stakeholder in the discussions to develop a strategy for the treatment and disposal of Te Anau wastewater.

25. It was wrongfully assumed this project would benefit Manapouri, in the future disposal of Manapouri effluent - when there are possibly other options of greater value.

26. New Zealand advertises internationally “100% Pure. Fiordland advertises a “Pristine Environment”. This application seeks to pollute our land and air with treated sewage.

27. There are alternative ways to discharge the effluent, yet none were investigated beyond a cursory glance by the consultants and staff of SDC. These options would alleviate the need to spread pollutants onto land, especially land in this pristine area.

1. One alternate, the discarded 2006 option “D” to treat to a standard, to discharge to natural state water.
2. Another: to bury a soak pipe in grid form over the required area as that proposed in this Application.
3. Another would be to use a worm farm and wetlands before discharge into natural state water.
4. Bio-filtro, Bio-Domes, lagoon and wetlands are yet other systems which were not investigated.

I/we believe this application should not be considered for the following reasons.

1. The lack of:-

1. detail and substance outlined in the Application,
2. environmental management and operation policies and plans,
3. detail of how or what environmental testing is to be done,
4. details on procedures and how odour/aroma will be controlled,
5. baseline soil and peat bog ecology data, - noted in the application,
6. any programme for Airport water testing,
7. process of advising the public of true findings of any testing,
8. sufficient information on contaminants in the receiving environment for the effects of the discharge onto land and to air, to be fully assessed,
9. stakeholder identification and therefore participation of the Manapouri community and surrounding landowners,
10. future ability to promote the Airport,
11. transparent costing of the project,
12. **and**, the effect on: quality of life, human health, amenity and cultural values.

2. Waters affected by the Application project:

As noted, The Waiau River & Lake Manapouri are Statutory Acknowledgement areas and the Kepler Mire is noted as a significant local habitat of indigenous fauna.

I/we submit that the Application be considered with respect to the purpose and principles of the RMA. We consider that contaminant pollution of the water and flora and fauna in these aforementioned bodies of water have the potential to **adversely affect:-**

- a. the natural character of the Waiua River, Lake Manapouri. RMA (section 6(a));
- b. the Kepler Mire - a significant local habitat of indigenous fauna - RMA (section 6(c));
- c. the estuarine ecosystem (section 6(a));
- d. the quality of the environment (section 7(f));
- e. amenity values (section 7(c));
- f. the habitat of trout and salmon (section 7(h)).
- g. To address section 6(e) the key issue is water quality, which could result in impacts on ecology, cultural values, recreation and public health.

I/we ask that this consent be declined and that Southland District council seek a further extension to the existing consent to allow other alternative options to be fully investigated and costed.

I/we DO / DO NOT wish to be heard in support of our submission.

I/we DO / DO NOT wish to be involved in any pre-hearing meeting that may be held for this application.

**A copy of this submission has been sent to:
MWH New Zealand Ltd., PO Box 649, Queenstown 9348**

Can be sent by Email: Simon.H.Beale@MWHglobal.com