

Memo

TO Hearings Panel (Gina Sweetman, Rawiri Faulkner, Jim Cooke)

FROM Shaun Andrewartha, Manager - Environmental Regulation, GWRC and Harry Wilson, Chief Executive Officer, SWDC

DATE 14 February 2020

SUBJECT Joint response from GWRC and SWDC in regard to Minute #14 (16 December 2019)

FILE NUMBER WAR/170229

Applicant: South Wairarapa District Council

Proposal: To discharge contaminants to water, land and air associated with the proposed long term upgrade and operation of the Featherston Wastewater Treatment Plant

Location: Featherston Wastewater Treatment Plant, Donald Street, Featherston
Site A – 65 Longwood West Road, Featherston
Site B – 270 Murphys Line, Featherston

1. Introduction

The Hearings Panel Minute #14 directed that the applicant, South Wairarapa District Council (SWDC), and Greater Wellington Regional Council (GWRC) respond to the Panel by no later than 5pm 14 February 2020 to provide an update on its current approach; which shall include:

- i. Progress to date;
- ii. An update on consultation undertaken to date;
- iii. An updated timetable;
- iv. The implications of the length of time since public notification and the matter of scope;
- v. The revised timeframe for a hearing, considering iv. above; and
- vi. A summary of relevant changes to the Proposed Natural Resources Plan, as updated by any appeals.

2. Progress to date

A progress update against the four steps identified as a Council agreed approach is identified in Table 1 below.

Table 1: Progress to date

Step	Task	Progress to date
1	Preparation of a table outlining the outstanding issues/information gaps, responsibility, key issues to resolve at future workshops	Complete.

	and matters set out in the GWRC s37 extension and Panel Minute #7.	
	SWDC experts draft scopes for the QMRA, Groundwater Effects Assessment and Monitoring and Pathogen sampling plan.	Complete.
2	GWRC and SWDC experts review and approve the scopes of work for the information gaps, with work to be undertaken over the next few months.	<p>Complete - review and approval of scopes of work for the information gaps</p> <p>Complete in part - addressing information gaps</p> <p><u>Technical feasibility assessment for “add-on” modern wastewater treatment technology</u></p> <p>The findings in NIWA’s Quantitative Microbial Risk Assessment (QMRA) report in relation to the proposal’s public health risks and associated effects of wastewater discharges, have been analysed by SWDC’s wastewater technical experts from Mott MacDonald. A draft technical note was presented to SWDC on 19 December 2019.</p> <p>Mott MacDonald’s analysis included a feasibility study into a treatment plant “add-on” that can achieve 10⁻⁴ norovirus per litre in the effluent leaving the Featherston WWTP. This is equivalent to a 9-log reduction in norovirus, as per the QMRA undertaken by NIWA.</p> <p>The purpose of the draft technical note delivered to SWDC was to:</p> <ul style="list-style-type: none"> • Confirm a tertiary polishing option that will achieve 10⁻⁴ norovirus per litre in the effluent leaving the Featherston WWTP. • Consider the potential clarity improvements that this polishing system will provide with respect to section 107 (RMA) requirements for the discharges to Donald Creek. • Inform discussions with suppliers about performance requirements. <p>The recommended tertiary treatment plant would comprise:</p> <ul style="list-style-type: none"> • A new pump station to lift the flows to duty/standby 0.5mm aperture screens. • Dissolved Air Flotation (DAF) plant (to be confirmed). • Membrane tanks complete with submerged

		<p>membrane modules.</p> <ul style="list-style-type: none"> • UV disinfection system. The flow would be pumped to discharge to land or water, sludge removed in the DAF plant, and membrane tanks dewatered and removed off-site by truck. <p>In combination with proposed land treatment, the recommended tertiary treatment plant could achieve a significant reduction in suspended solids and algae, and therefore would improve the colour and visual clarity of the discharge to Donalds Creek.</p> <p>The outcomes of this draft technical note has been subject to further discussions between Wellington Water, SWDC and GWRC officers to help inform the options available to SWDC to mitigate public health and environmental effects. Discussions have covered whether it is feasible and within scope to continue to progress this application with the recommended ‘add on’ treatment to meet NIWA’s recommendation in their QMRA report.</p>
3	SWDC conduct community engagement which is likely to include community meetings/workshops – to help inform the ‘experts’ workshop identified in Step 4 below.	No further community engagement has been undertaken since the last update provided to the Hearings Panel on 13 December 2019.
4	Expert workshops. The overall goal is to get clarity on the issues, how/if these can be resolved and the different options available to the applicant (together with any perceived risks) going forward.	No progress.

3. An update on consultation undertaken to date

SWDC has not undertaken any additional public consultation activities since the last joint memo provided to the Hearings Panel on 13 December 2019. However, a number of collaborative discussions between SWDC and GWRC staff has occurred since the last joint memo. These discussions have covered the outcomes of the QMRA, the recommended add-on treatment option identified by Mott MacDonald to meet the recommended level of treatment identified in the QMRA, and the options available to SWDC to progress the current proposal, or otherwise.

Further, as SWDC became a joint owner of Wellington Water from 1 October 2019, discussions about progressing the application under the current proposal, or otherwise, has been undertaken with senior management from Wellington Water.

4. An updated timetable showing matters in progress to deal with outstanding issues

There has been no updates to the timetable provided in the 13 December 2019 joint memo to the Hearings Panel. Progress of the technical assessments have been detailed in Table 1 above.

5. The implications of the length of time since public notification and the matter of scope

SWDC and GWRC are aware of the time that has elapsed since the application was lodged in 2018, and the multiple extensions to timeframes granted by GWRC under section 37 of the Resource Management Act 1991. This has enabled the application timeframes to be extended until the end of May 2020 for the completion of a hearing.

SWDC has over the past six months dealt with many water, wastewater and stormwater matters in both Featherston and neighbouring townships. SWDC is now more cognisant of climate change mitigation, and believe that there is a real opportunity to rethink how Featherston's wastewater can be treated by more modern technology to future proof it for the long-term, as well as address the effects of the wastewater discharge on the receiving environments. SWDC recognises that the most significant contributor to the district's CO₂ emissions is methane created by traditional pond systems. In addition, an increasing pressure to improve freshwater quality requirements, and work with the community together to implement feasible treatment options is more apparent.

SWDC will continue to strive for the delivery of a cost-effective treatment system for Featherston's wastewater, and has had initial discussions with GWRC about the options available to SWDC to either:

- a) Progress the resource consent application for the current proposal to irrigate to land in a staged approach, with the recommended 'add-on' treatment to address section 107 RMA matters and public health risks and effects. *Scope will still need to be addressed regarding the 'add-on treatment', and any other changes to the application/proposal since notification.*
- b) Progress the resource consent application for the current proposal to irrigate to land in a staged approach, with an alternative measure to mitigate public health risks. *Scope will still need to be addressed regarding any alternative measures, associated effects, and any other changes to the application/proposal since notification.*
- c) Re-notify the application based on the current application (with a yet to be confirmed add-on treatment) to enable those who did not have the opportunity to submit, to now become part of the consent process. *The implications of scope may still need to be addressed.*
- d) Withdraw the application and lodge a new application. This would involve SWDC taking into account modern technology and climate change mitigation, as well as undertaking a programme of engagement with the community about the options being considered. *The implications of scope will no longer need to be addressed, as a new application will be put forward.*

SWDC needs to complete robust discussions of these options with its senior management team and GWRC Environmental Regulation senior management. In particular, SWDC's Councillors will be involved with the decision-making process of which option will be chosen. The decision on which option SWDC will proceed with will be taken at a meeting of Council (either the next scheduled meeting or by calling an extraordinary meeting). The decision will be provided to the Hearings Panel as soon as possible thereafter, or, at the latest, in the next update to the Hearings Panel.

6. The revised timeframe for a hearing

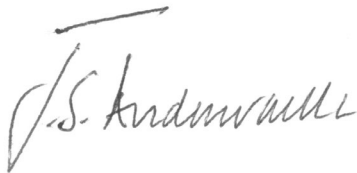
As a decision is yet to be made on which option SWDC will proceed with, a revised timeframe for a hearing, including whether a hearing will take place at all, will be confirmed in the next update to the Hearing Panel.

7. A summary of relevant changes to the Proposed Natural Resources Plan, as updated by any appeals

There are no further updates to the Proposed Natural Resources Plan, as updated by any appeals that have been looked at by SWDC or GWRC for this consent application.

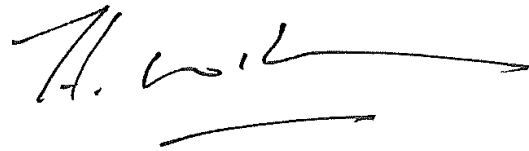
8. Next update to the Hearings Panel

If acceptable to the Hearings Panel, GWRC and SWDC will provide a joint memo to the Panel by 5pm 20 March 2020, which will cover the intended direction SWDC will take to either progress the current proposal (with or without the recommended add-on treatment), re-notify, or withdraw and lodge a new application.



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