

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 27 September 2019

SUBJECT Joint response from GWRC and SWDC in regard to Minute #11 (23 August 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 #11 directed that the applicant, South Wairarapa District Council (SWDC), and Greater Wellington Regional Council (GWRC) respond to the Panel by no later than 5pm 27 September 2019 to provide an update on its current approach; which shall include:

- Progress to date;
- An update on consultation undertaken to date;
- An updated timetable;
- Whether an extension of time has been approved, and the revised timeframe for a hearing; and
- 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 – with ongoing updates. Sven Exeter (SWDC's Consultant Planner – Mott MacDonald) is keeping this table up-to-date to reflect the progress against the outstanding issues/information gaps, responsibility and key issues being resolved. This table is shared with GWRC on an 'as

	and matters set out in the GWRC s37 extension and Panel Minute #7.	required' basis i.e. when there are substantial changes.
	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>In progress - addressing information gaps</p> <p><u>Pathogen sampling</u></p> <p>The final rounds of WWTP sampling is complete, which will contribute to the analysis of pathogens (bacterial and viral) in the WWTP before and after UV disinfection.</p> <p><u>Groundwater monitoring (pathogens and other relevant parameters) and effects assessment</u></p> <ul style="list-style-type: none"> • Monitoring of groundwater quality (3 rounds) and levels (5 rounds) on the proposed irrigation site has commenced, and is anticipated to be completed in October 2019. Long term groundwater level recorders have been installed in two wells (MW2 and MW12). • To date, three landowners of neighbouring bores have given SWDC permission to take a groundwater sample, evaluate their bore head security, observe existing land use activities, and on-site wastewater septic tanks and disposal systems, and groundwater sampling at these sites has been undertaken and work is ongoing. <p><u>Quantitative microbial risk assessment (QMRA) / public health risk assessment)</u></p> <ul style="list-style-type: none"> • Groundwater and WWTP sampling (as identified above), and the evaluation of neighbouring bore results are being provided to NIWA as part of the information contributing to the QMRA. NIWA have commenced the QMRA on in early September 2019. A draft QMRA report is anticipated to be completed in early October 2019. <p><u>Technical feasibility assessment for “add-on” modern wastewater treatment technology</u></p>

		<ul style="list-style-type: none"> The first phase of a two phase feasibility study on WWTP add-on options has been completed. The second phase of this feasibility study will consider the QMRA recommendations for additional virus treatment (if required) from the QMRA once complete. <p><u>Soil survey interpretation</u> Katie Beecroft (SWDC's Land Treatment Specialist) has completed soil mapping and soil hydraulic conductivity testing, which has been added to update site investigation and technical reports. She will be providing this updated information for discussion with GWRC and relevant technical experts in advance of the expert workshop.</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.	An update on consultation undertaken since the last update to the Hearings Panel in August, is detailed in section 3 below.
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.	As noted in our 23 August 2019 joint memo, ecologists have been discussing their outstanding issues. The logistics for holding an expert workshop has continued, and we are aiming at having an initial workshop in mid to late November 2019 (subject to expert availability) after the technical assessments and QMRA are complete.

3. An update on consultation undertaken to date

Since the last update provided in the 23 August 2019 joint memo, SWDC has undertaken the following consultation activities:

- A project update to the Maori Standing Committee on 9 September 2019, by Harry Wilson (Chief Executive Officer).
- Face to face meetings with Ra Smith (Ngāti Kahungunu) and Horipo Rimene (Rangitāne o Wairarapa) by Harry Wilson and Lawrence Stephenson (SWDC Assets and Operations Manager). The project was discussed and further information in relation to effects on the Wairarapa Moana was provided to Ra Smith.
- Community site visits to the Greytown WWTP and Featherston WWTP on 21 September 2019. Around 30 people took up SWDC's invitation to visit these two WWTP's to see in person how the treatment and land irrigation facilities operate at the Greytown WWTP, the current facilities Featherston WWTP, and how the proposed treated wastewater to land would operate. Lawrence Stephenson and Harry Wilson led the discussions, including answering many questions asked by attendees.
- Ongoing provision of responses to written questions/queries received about the project.
- A media release advising of the provision of a new resource available on the SWDC website summarising the project's objectives, information about the resource consent process, as well as the additional technical assessment work being completed before the hearing process.

- Continued collaborative discussions between SWDC and GWRC staff regarding the progress of technical assessments, consultation, outstanding issues/matters, and programme.

4. Updated timetable

The timetable (Table 2) has been updated to reflect SWDC’s extension to timeframe request that has been submitted to GWRC (refer to section 5 below for more detail), with anticipated progress now showing October through to December 2019.

Table 2: Proposed timetable to deal with outstanding issues

Key:  In progress

	Outstanding issue	Proposed timing - 2019		
		October	November	December
1	Impacts of the meaning and effect of the provisions of the Proposed Natural Resources Plan decisions and appeals.			
2	Further consultation by SWDC with submitters, the community (including Maori/iwi representatives), and with GWRC officers.			
3	Information in relation to the effects of discharge to land on groundwater that was agreed in the Joint Witness Statement to be provided to GWRC.			
4	Analysis of pathogens (bacterial and viral) in the Wastewater Treatment Plant before and after UV disinfection, which should be undertaken on at least three to four separate occasions by a competent laboratory.			
5	SWDC to undertake a soil survey in site B in particular to provide certainty on soil types and identify whether there is any evidence of macropores that would cause short circuiting of irrigated wastewater.			
6	NIWA’s qualitative assessment of health risk be replaced by a quantitative microbial risk assessment (QMRA) with as many of the assumptions in the qualitative assessment as possible being replaced by measurements or robust estimates agreed by all experts.			
7	Further discussions between experts, particularly surrounding the outstanding areas of disagreement and areas where more information is required. Expert workshops will be held to: <ol style="list-style-type: none"> 1. Obtain clarity on the issues 2. How/if these can be resolved 3. Identify the different options available to the applicant (together with any perceived risks) going forward 			
8	Scope – addressing whether the public health risk arising from pathogen spread through the groundwater is within the scope of what was applied for. Due to the work being undertaken by the applicant to address both GWRC and submitter concerns, any proposed changes to the activities applied for will need to be considered to ensure that they are also within scope of the original application.			

5. Whether an extension of time has been approved, and the revised timeframe for a hearing

As identified in the previous joint memo to the Hearings Panel (dated 23 August 2019), sufficient time for matters such as completing technical assessment work, expert workshops, addressing outstanding matters and issues (such as scope), need to be addressed before a hearing commences. SWDC has lodged a request to extend the current timeframe to complete a hearing by 1 November 2019, to complete a hearing by 29 May 2020.

This request takes into account sufficient time to complete the additional technical work as per Minute 7 and consequential minutes, workshop the outcomes of the additional work, the need for GWRC and SWDC to then undertake dialogue around their Officer's Report, evidence, meeting statutory timeframes with getting documents out before a hearing can commence. SWDC will also require sufficient time to consult with the submitters and community in relation to outcomes from the additional technical information, which is still in progress.

GWRC has approved SWDC's request. An update will be provided to the Hearings Panel in the next joint memo on what progress has been made, as well as a revised timeframe for the hearing.

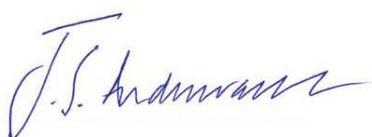
6. A summary of relevant changes to the Proposed Natural Resources Plan, as updated by any appeals.

The appeal period for decisions on the PNRP closed at 5pm on 18 September 2019. There is no new visibility of any relevant changes to the PNRP, updated by any appeals.

7. Next update to the Hearings Panel

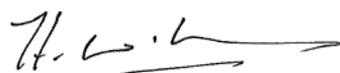
If acceptable to the Hearings Panel, GWRC and SWDC will provide a joint memo to the Panel by 5pm 1 November 2019, which covers:

- Progress to date;
- An update on consultation undertaken to date;
- An updated timetable;
- The revised timeframe for a hearing; and
- A summary of relevant changes to the Proposed Natural Resources Plan, as updated by any appeals.



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Harry Wilson

Chief Executive Officer, SWDC