



greater WELLINGTON
REGIONAL COUNCIL

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Greater Wellington is the promotional
name of the Wellington Regional Council

Wellington City Council
C/- Capacity (Wellington Water Management Limited)
Private Bag 39804
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Lower Hutt 5045

For: Paul Glennie

Dear Paul

Further information request under section 92(1) of the Resource Management Act 1991

<i>Applicant:</i>	<i>Wellington City Council, Infrastructure Planning</i>
<i>Proposal:</i>	<i>To discharge stormwater and occasionally discharge contaminated stormwater (namely wastewater overflows into the stormwater system) into the Coastal Marine Area (CMA) and land adjacent to the CMA via existing stormwater outlets between Horokiwi and Owhrio Bay.</i>
<i>Location:</i>	<i>All stormwater outfalls culverts and pipes, between Horokiwi, Wellington Harbour and Owhrio Bay, south coast of Wellington.</i>
<i>Resource consents required:</i>	<i>Coastal permit and discharge permit</i>

Thank you for your application, which we received on 19 December 2008. The application fee associated with this consent is to be paid by purchase order, can you please provide Greater Wellington (GW) with a purchase order number for this application.

Owhiro, Kaiwharawhara and Ngauranga Stream discharges

You have stated that consent is not being sought for the Owhiro, Kaiwharawhara and Ngauranga Stream discharges at this time as they are not considered to be discharges to the Coastal Marine Area (CMA) under the Resource Management Act 1991 (the Act). While we can acknowledge that the multiple stormwater discharges into these streams are not part of the application you are currently seeking resource consent for at this time, Greater Wellington (GW) will expect

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applications to be made in the future¹. We note in particular, the very high faecal bacteria results Wellington City Council (WCC) has recorded in the lower Kaiwharawhara Stream during 2008 – such results are a clear indication of sewage contamination and suggest non-compliance with existing permitted regional plan rules for stormwater discharges.

As noted in the application these streams are currently included in WCC's stormwater monitoring programme. GW encourages you to continue monitoring these sites as the information gathered will be useful when an application is made in the future. A map indicating the location of the constructed overflow discharge points and monitoring locations along the Owhiro, Kaiwharawhara and Ngauranga Streams (and any other streams known to receive discharges of effluent from constructed overflows, such as Karori and Porirua) would be necessary information for such an application also.

Further information requested

I have reviewed your application and the supporting information. However, I need further information on your application so that I can better understand the effects of your proposal to discharge stormwater and occasionally discharge contaminated stormwater (namely wastewater overflows into the stormwater system) into the Coastal Marine Area (CMA) and land adjacent to the CMA via existing stormwater outlets between Horokiwi and Owhiro Bay, its effects on the environment and how any adverse effects on the environment might be mitigated.

Information requested²

Information on the stormwater catchments

1. *Can you please confirm that no discharges from the culverts listed under Category 2 of the application have constructed overflows?*
2. *Please describe the maintenance (such as how frequently the stormwater systems are inspected) and upgrade plans for any aging or damaged pipes to be undertaken in any of the stormwater catchments into the foreseeable future (10 years)?*

This information is required so that I can accurately assess stormwater catchments, the nature of the discharges and the impacts that the discharges may have on the marine environment.

Mitigation

Overall, GW envisaged there would be more measures proposed to mitigate the effects of the discharges, in particular the constructed overflow discharges to the CMA. The measures discussed between GW and WCC/Capacity in the past has included prioritisation of discharges to "close" constructed overflows and/or installation of treatment devices at the end of the outfalls. There was a lack of information provided in the application in regards to mitigation.

¹ GWRC intends to review its regional plan rules for stormwater discharges to freshwater – consents will be required in certain catchments, including those draining to Porirua and Wellington harbours.

² Any person who has been asked to provide further information under section 92(1) of the Resource Management Act 1991 (the Act), has the right to object to the consent authority in respect of that request for information under section 357A(1)(b) of the Act.



3. *Aside from the monitoring of sewage overflows (which have a microbiological focus), no further mitigation measures have been proposed to remedy the effects of the discharges on the CMA. Can you please provide further information on what mitigation measures are proposed to avoid, remedy or mitigate the effects of these discharges on the CMA? For instance, what special investigations are proposed to identify and reduce contaminant "hotspots" (hotspots refer to those sites high in both heavy metals and/or bacteriological contamination) in the stormwater network, are any infrastructure upgrades proposed e.g. installation of treatment devices at outfalls etc?*

In terms of any proposed infrastructure upgrades has this work been prioritised or it is planned to be prioritised upon the results of the monitoring proposed under this application?

4. *What possible alternative methods of discharge are available for constructed overflows? For example, connecting outfalls to another pump station or existing storage facilities, installation of treatment devices etc.*
5. *What mitigation measures are currently in place if the constructed overflows occur? Is the discharge pumped to another area in the network, or just investigated after the flows occur? Is it possible to manage the sewer network from constructed overflows?*
6. *Can you please provide information on the number of sewage overflows to date, duration of each event, the volumes of the overflow, as well as any specific actions proposed to reduce or prevent future overflows from constructed overflow catchments? In particular concern to GW is the frequency that the Davis Street and Houghton Bay outfalls are currently discharging via constructed overflows.*
7. *You have stated that 14 constructed overflows manholes are currently being monitored. Can you please list the 14 sites where electronic monitoring equipment has been installed to gather information on sewage overflows?*
8. *Can you also provide what information has been obtained to date in terms of priority overflows to "close" and has any timeline for closure works been developed?*

Nature of the discharge and sampling

9. *For the major stormwater discharges listed in Table 2.1 of the application can you please inform me of the relative proportions of residential versus commercial and industrial land-use within these stormwater catchments? Please identify the relative proportions of this as industrial/commercial, roading, and residential etc.*
10. *In those catchments with constructed overflows, at what frequency (e.g., number of times per year) and under what conditions (e.g. flow rates in the sewer, weather, and spills) does sewage enter the stormwater system in each catchment? Does sewage enter the system in each particular catchment during dry weather base-flows?*
11. *You have stated in a footnote on page 15 of the application that removal of tide-influenced bacteria results had only a minor effect on data analysis. Can you please provided more*



information for the 12 affected sites preferably in spreadsheet format highlighting the results that were disregarded, as well as the data used in the “dry and wet weather” analysis.

- 12. On page 16 of the application you have stated that landfill leachate is at times discharged to the South Coast via the Houghton Bay stormwater outfall. This has been observed to produce conspicuous coloured discharges in Houghton Bay and discharges have generated public complaints. Can you please provide further information as to what WCC’s proposed actions, including a programme of works, to eliminate future leachate discharges to the CMA?*
- 13. Table 3.2 of the application summarises stormwater quality for discharges in dry and “wet” weather. To enable us to better understand the nature of typical stormwater discharges in wet weather, please provide an additional table that summarises just rain-related stormwater sampling data (range and median values). Please include details of rainfall prior to sampling and an estimate of the rate of discharge at the time of sampling. A comment should also be provided on the significance of the rainfall event (e.g., six-month return period, etc.).*
- 14. Comment is made on page 29 of the application that litter and floatables are well controlled by street sumps. However, significant amounts of litter and floatables are commonly seen in the inner harbour waters between the Overseas Passenger Terminal and Freyberg Pool, particularly after wet or stormy weather. Please comment. In addition, have any further investigations been carried out on any other catchments?*
- 15. In the application you have provided the location of major stormwater outfalls in Appendix 2. Can you please provide a map and grid reference of the exact location of the sampling point for these stormwater discharges. For each of the respective outfalls can you please indicate if the sampling locations are influenced by tidal levels?*
- 16. You have stated that responses from various parties have all been in support of a holistic approach that allows for more information about the effects of stormwater being made available, but this was tempered slightly with questions of what mitigation efforts might follow a monitoring programme and how stormwater contaminants will also be addressed. Can you please provide information on the forms of mitigation the public were seeking and how these concerns are being addressed?*
- 17. As some stormwater monitoring occurs upstream of the discharge outfalls within the stormwater network, please provide a map and grid reference locations for all proposed monitoring locations?*
- 18. Please explain the rationale behind using 6 mm of rainfall in the 12 hours prior to sampling as constituting a “wet weather” stormwater discharge event?*
- 19. Contaminants often enter the stormwater network via spills or unauthorised discharges from private or commercial properties. What education programmes or other initiatives does WCC propose to address this significant issue?*
- 20. How long does it take for contaminant source investigations/sanitary surveys to be carried out?*



This information is required so that I can accurately assess the nature of discharge and the impacts that the discharge may have on the marine environment.

Date information required

Please provide the above information to me by **4 March 2009**. If you are not able to supply the information requested³ by this date, you must let us know in writing within this timeframe, either that you require additional time (at which time we will set a reasonable timeframe for you to provide the information) or that you refuse to provide the requested information.

We may decline your application if we consider we have insufficient information to enable us to determine your application, or if you do not respond to our request by **4 March 2009** or if you refuse to supply the information. If you consider you have a valid reason for refusing to provide the requested information, please contact me on the number below to discuss this further.

I am happy to meet with you to discuss the information required.

Processing of your application

Your application has been placed on hold, and the statutory 'clock' stopped⁴, until such a time that either I receive the above information, receive written notice that you refuse to provide it, or the time period for providing the requested information has expired. As soon as one of these occurs, the statutory 'clock' will restart and I can continue processing your application.

After we receive the information from this request and determine that we have enough information we will proceed to notify your consent.

Please feel free to contact me on 04 802 0335 if you have any questions or concerns or contact Miranda Robinson, Team Leader, Environmental Regulation on 04 381 7744.

Charging policy review

The Resource Management Charging Policy is reviewed on an annual basis. As a result of this process the charges associated with processing your consent may alter – you will be informed if this is the case.

Yours sincerely

Amy Holden
Resource Advisor, Environmental Regulation

³ Under section 92A of the Resource Management Act 1991.

⁴ Under section 88C of the Resource Management Act 1991