

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 1 November 2019

SUBJECT Joint response from GWRC and SWDC in regard to Minute #12 (30 September 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 #12 directed that the applicant, South Wairarapa District Council (SWDC), and Greater Wellington Regional Council (GWRC) respond to the Panel by no later than 5pm 1 November 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;
- A 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 and matters set out in the	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

	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 WWTP pathogen sampling is complete. The results of the sampling has been used by NIWA as part of the analysis of pathogens (bacterial and viral) in the WWTP before and after UV disinfection, and for the Quantitative Microbial Risk Assessment (QMRA).</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 (4 rounds) and levels (6 rounds) on the proposed irrigation site is now complete. • To date, 7 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. Groundwater sampling and bore head security evaluations at 4 neighbouring sites is now complete. The remaining bores will be tested in early November 2019. <p><u>Quantitative Microbial Risk Assessment (QMRA / public health risk assessment)</u></p> <p>NIWA will be completing the final QMRA report in early November 2019. The QMRA is a particularly important assessment, as its findings in relation to public health risk associated with wastewater discharges will be subject to further analysis and discussion by both SWDC and GWRC's technical experts.</p> <p><u>Technical feasibility assessment for "add-on" modern wastewater treatment technology</u></p> <p>The second phase of the "add-on" feasibility study will commence once the final QMRA report is complete. The feasibility study will identify recommendation for additional</p>

		<p>virus treatment (if required). This second phase study is anticipated to be completed in December 2019.</p> <p><u>Soil survey interpretation</u> Katie Beecroft (SWDC’s Land Treatment Specialist) is still in the process of completing updated site investigation and technical reports, so this updated information can be provided to GWRC and its relevant technical experts for further review and discussion.</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.	<p>The expert workshops programmed to take place in November 2019 will be postponed. The reasons for this are as follows:</p> <ul style="list-style-type: none"> • The need for the outstanding groundwater, soil and QMRA technical assessment work to be completed and provided to GWRC’s technical experts for a robust review and discussion between both Council’s experts. • The need to understand the outcome of the Phase 2 “add-on” feasibility study, which may result in changes to treatment than that originally proposed (and whether the changes are considered to be within scope of the application). • Expert availability.

3. An update on consultation undertaken to date

Since the last update provided in the 27 September 2019 joint memo, SWDC has undertaken the following consultation activities:

- Ongoing provision of responses to written questions/queries received about the project.
- A media release advising the public of SWDC being granted a further extension of time by GWRC to complete the hearing for this resource consent application by 29 May 2020.
- Continued collaborative discussions between SWDC and GWRC staff regarding the progress of technical assessments, consultation, outstanding issues/matters, expert workshop, and programme.

4. Updated timetable

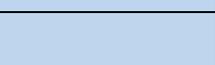
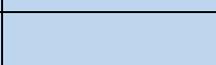
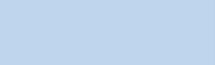
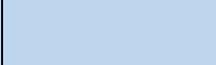
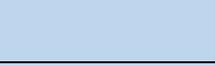
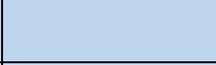
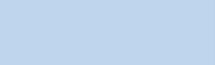
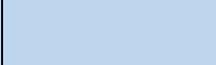
Both Council’s consider it appropriate to provide a more accurate updated timetable for January 2020 onwards in the next update to the Hearings Panel. The primary reason for providing an

updated timetable then, is that there will be an overall better understanding of the technical assessment work findings, and progress of addressing the outstanding matter of scope.

Therefore the timetable (Table 2) has been updated to reflect that all outstanding matters are being progressed during November and December 2019.

Table 2: Proposed timetable to deal with outstanding issues

Key:  In progress

	Outstanding issue	Proposed timing - 2019	
		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. The revised timeframe for a hearing

SWDC has been granted an extension to timeframe to complete a hearing by 29 May 2020. Both SWDC and GWRC consider that it is more appropriate to provide a revised timeframe for a hearing in the next update to the Hearings Panel. The primary reason for providing a revised timeframe then, is that there will be an overall better understanding of the technical assessment work findings, and progress of addressing the outstanding matter of scope.

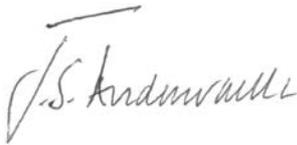
6. A summary of relevant changes to the Proposed Natural Resources Plan, as updated by any appeals.

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

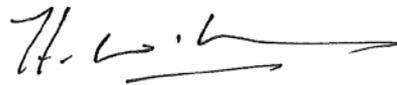
If acceptable to the Hearings Panel, GWRC and SWDC will provide a joint memo to the Panel by 5pm 13 December 2019 (the last for 2019), which covers:

- 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.



Shaun Andrewartha

Manager - Environmental Regulation, GWRC



Harry Wilson

Chief Executive Officer, SWDC