

Notice is given that an extraordinary meeting of the Nelson Regional Sewerage Business Unit will be held on:

Date: Tuesday 30 October 2018
Time: 3.00 pm
Meeting Room: Tasman Council Chamber
Venue: 189 Queen Street
Richmond

Nelson Regional Sewerage Business Unit

AGENDA

MEMBERSHIP

Chairperson Cr Kit Maling
Members Cr Dean McNamara
Cr Tim Skinner
Cr Stuart Walker

(Quorum 2 members)

Contact Telephone: 03 543 8524
Email: robyn.scherer@tasman.govt.nz
Website: www.tasman.govt.nz

AGENDA

1 OPENING, WELCOME

2 APOLOGIES AND LEAVE OF ABSENCE

Recommendation

That apologies be accepted.

3 DECLARATIONS OF INTEREST

4 PUBLIC FORUM

5 PRESENTATIONS

Nil

6 REPORTS

6.1 NRSBU Draft Business Plan 2018/2019 5

6 REPORTS

6.1 NRSBU DRAFT BUSINESS PLAN 2018/2019

Decision Required

Report To:	Nelson Regional Sewerage Business Unit
Meeting Date:	30 October 2018
Report Author:	Robyn Scherer, Executive Assistant - Engineering
Report Number:	RNRSBU18-10-1

1 Summary

- 1.1 In response to a request from Nelson City Council to review the NRSBU Draft Business Plan 2018/2019, the plan has been revised.
- 1.2 The Nelson City Council Works & Infrastructure Committee has also requested a review of the Bell Island resource consent application.
- 1.3 It is recommended that the Nelson Regional Sewerage Business Unit Committee adopts the revised Draft Business Plan 2018/2019 (**Attachment 1**).
- 1.4 It is recommended that the Committee instructs the Acting General Manager to issue a response to the Nelson City Council Works & Infrastructure Committee in response to their letter dated 28 September 2018.

2 Draft Resolution

That the Nelson Regional Sewerage Business Unit:

1. receives the **NRSBU Draft Business Plan 2018/2019 report; and**
2. **approves the NRSBU Business Plan 2018/2019 as revised; and**
3. **instructs the NRSBU Acting General Manager to issue the final NRSBU Business Plan 2018/2019 to Nelson City Council and Tasman District Council; and**
3. **approves the draft response for issue to the Nelson City Council Works & Infrastructure Committee.**

3 Purpose of the Report

- 3.1 This report seeks approval of the NRSBU Committee for revisions to the Draft Business Plan 2018/2019 (that had previously been approved).
- 3.2 The report also seeks approval from the NRSBU Committee for the Acting General Manager to issue the draft response to the Nelson City Council Works & Infrastructure Committee's 28 September 2018 letter.

4 Background and Discussion

- 4.1 The earlier version of the Draft Business Plan 2018/2019 was approved by Tasman District Council, but not by Nelson City Council. Nelson City Council (via its Works & Infrastructure Committee) has requested that the Plan be reviewed so that it better complements the Nelson City Council's Long Term Plan.
- 4.2 The specific request is detailed in the letter from Nelson City Council dated 28 September 2018 (**Attachment 2**).
- 4.3 The Draft Plan has been reviewed and now contains more detail to clarify the intended works that will achieve better environmental outcomes.
- 4.4 A draft response that discusses the alignment of the Bell Island resource consent application with the Nelson City Council's Long Term Plan has been prepared for consideration by the Committee (**Attachment 3**).
- 4.5 A draft response that discusses the iwi engagement to-date relating to the Bell Island resource consent application (**Attachments 4 and 5**) has also been prepared for consideration by the Committee.

5 Options

- 5.1 The NRSBU committee has three options:
 - Option one: The NRSBU Committee approves each document for issue.
 - Option two: The NRSBU Committee rejects the changes to the Draft Business Plan 2018/2019.
 - Option three: The NRSBU Committee instructs the Acting General Manager to amend any or all of the documents for later re-consideration by the Committee.

6 Strategy and Risks

- 6.1 Further delays in approving the Draft Business Plan 2018/2019 may result in delays in implementing intended physical works.

7 Policy / Legal Requirements / Plan

- 7.1 The changes requested in the draft NRSBU Business Plan 2018/2019 meet the requirements of the Nelson City Council's Long Term Plan.

8 Consideration of Financial or Budgetary Implications

- 8.1 The revisions to the Draft NRSBU Business Plan 2018/2019 are just clarifications of works that were already intended. There are no significant financial implications of adopting the revised plan.
- 8.2 There has been a modest cost for the review of the Draft Annual Plan 2018/2019 and the Bell Island resource consent application.

9 Conclusion

- 9.1 It is recommended that the Board adopts the revised NRSBU Draft Business Plan 2018/2019 and instructs the Acting General Manager to issue the final plan to Nelson City Council and Tasman District Council.

10 Next Steps / Timeline

- 10.1 Once the Draft Business Plan is finalised, the Acting General Manager will issue the final plan to the Nelson City Council and Tasman District Council.

11 Attachments

1. Draft Business Plan including supplementary page	9
2. Letter from Nelson City Council Infrastructure Committee	31
3. Alignment with Nelson City Council's Long Term Plan	33
4. Bell Island Resource Consent, Iwi Meeting Notes	39
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Nelson Regional Sewerage Business Unit



**Business Plan
2018/2019**



Nelson Regional Sewerage Business Unit (NRSBU)

Business Plan 2018/2019

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Appendices

- A Board Planning/Meeting Timetable
- B Levels of Service
- C Business Improvement Plan
- D Ten-Year Plan Operations, Maintenance and Capital Expenditure
- E Treatment Plant Schematic

Prepared by: Johan Thiar
Senior Asset Engineer – Solid Waste

Reviewed by: Jeff Robinson
General Manager

Nelson Regional Sewerage Business Unit
Approved:

Cover photograph: Bell Island

1. PURPOSE

The purpose of the Nelson Regional Sewerage Business Unit Business Plan 2018/19 is to detail management goals and objectives to not only deliver the wastewater collection and treatment services to the region but to also improve the effectiveness and efficiency in the delivery of those services.

2. MEMORANDUM OF UNDERSTANDING REQUIREMENTS

The Memorandum of Understanding states that the NRSBU Board shall by 31 December each year supply to the Councils (Nelson City and Tasman District Councils) a copy of its Business Plan for the management of the Nelson Regional Sewerage Business Unit and the assets for the ensuing year, together with any variations to the charges proposed for that financial year.

The Memorandum of Understanding (MOU) was reviewed during 2015. The new MOU commenced on 1 July 2015 and shall terminate on 30 June 2025.

3. INTRODUCTION

This Business Plan 2018/19 outlines the projects and initiatives to be implemented during the year. It also outlines the associated funding required and the details on the performance targets and measures.

The Business Plan is aligned with the NRSBU Strategic Plan and the NRSBU Wastewater Asset Management Plan 2017. It incorporates the business objectives and performance targets (Section 4) and the three-year financial forecasts (Section 6). The following key pieces of information from these other documents are included in the appendices of this business plan;

Appendix A – Board Activity Schedule;

Appendix B - Targeted service levels established by the Asset Management Plan;

Appendix C - Internal business improvement plan;

Appendix D - The 10 year financial plan;

Appendix E - Schematic layout of the NRSBU operations.

4. MISSION STATEMENT

The NRSBU's mission statement is:

"To identify the long term wastewater processing and reticulation needs of our customers and to meet current and future needs in the most cost effective and sustainable manner."

5. STRATEGIC GOALS

The NRSBU aspires to achieve the following goals:

- Wastewater reticulation, treatment and disposal services meet customers' long term needs.
- The costs of wastewater reticulation, treatment and disposal services are minimised.
- Risks associated with the services provided are identified and mitigated to a level agreed with customers and owners.
- We engage the right people with the right skills and experience.
- The NRSBU operates sustainably and endeavours to remedy or mitigate any identified adverse environmental, social and cultural impacts.

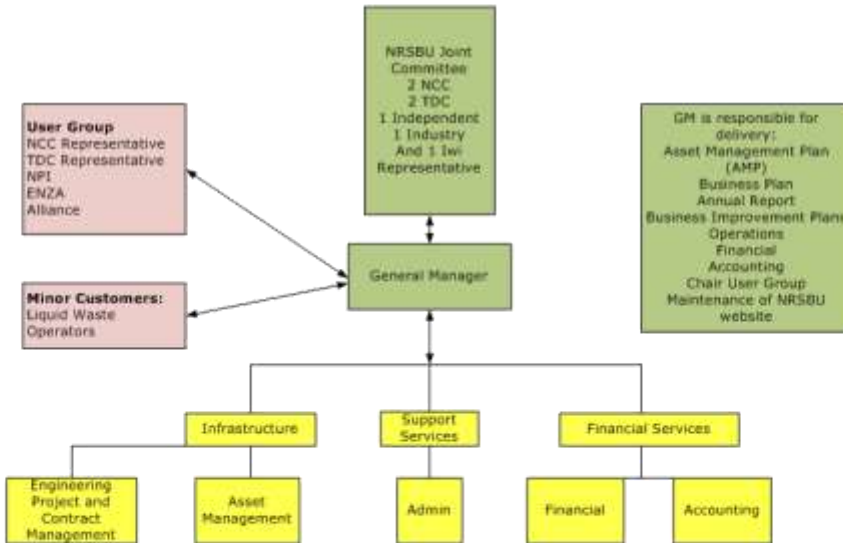
- Good relationships are maintained with all stakeholders.
- All statutory obligations are met.

The NRSBU functional activities are managed by the Nelson City Council and therefore the NRSBU functional activities shall comply with the requirements of the Nelson City Council Health and Safety Policy, and fully subscribe to the vision for a Zero Harm Culture.

All strategic goals are important and no one goal will be pursued at the expense of another.

6. NRSBU STRUCTURE AND BACKGROUND

The structure of the Nelson Regional Sewerage Business Unit is as follows:



The Nelson Regional Sewerage Business Unit was established in July 2000, replacing the former Nelson Regional Sewerage Authority established in the 1970s.

Following the adoption of a new Strategic Plan in August 2013 the 2017 Wastewater Asset Management Plan was developed and adopted on 15 September 2017. A draft of the long term financial plan based on the Asset Management Plan was provided to Tasman District Council and Nelson City Council respectively in July and October 2017 to enable them to consolidate the NRSBU long term plan into their strategic documents.

With the completion of significant upgrade programmes over the last few years the treatment plant now has adequate capacity to treat projected loads beyond 2025 without further significant capital investment. A review of the biosolids produced at the plant, as well as the capacity of the radiata pine plantations on Bell Island and Rabbit Island to receive biosolids, has demonstrated that the land available for the disposal of biosolids is also adequate for projected loads up to 2025.

7. BUSINESS OBJECTIVES AND PERFORMANCE MEASURES

The objectives outlined below describe the long term aims of the business unit. Performance measure targets and dates (where they are not specified below) are set annually in the Business Plan along with performance measures for projects identified in the Asset Management Plan. Performance will be reported quarterly to the Board and annually or six monthly, as appropriate, to the shareholding Councils.

Long Term Objectives	Key Performance Measures
<i>Wastewater reticulation, treatment and disposal services meet customers' long term needs</i>	
Sufficient reticulation, treatment and disposal capacity is available for loads received.	Loads do not exceed the capacity of the system components.
Intergenerational equity is maintained.	Loans are repaid over 30 years (the average life of the assets).
Customers are encouraged to engage with the organisation and are satisfied with the service.	All customer representatives attend at least 75% of customer meetings. Customer surveys show an average score of at least 5 out of 7 on satisfaction with services.
Levels of service are defined in all contracts and are met.	100% compliance with service level agreements by all major contractors.
<i>The cost of wastewater reticulation, treatment and disposal services are minimised</i>	
The costs of reticulation, treatment and disposal are minimised.	The operational costs of reticulation, treatment and disposal processes are benchmarked against costs incurred up to 30 June 2014. All capital projects are delivered within budget.
The economic lives of all assets are optimised.	Three yearly independent audit of asset management practices confirms this.
Customers understand the benefits of demand management and the costs, risks and environmental implications of increasing demand.	Combined loads do not exceed the capacity of the components of the system.
New technology choices are well understood and are proven to be reliable, sustainable and cost effective.	All significant technology choices are supported by cost benefit analysis, independent peer review, energy efficiency analysis, risk analysis and, where appropriate, by other users of those technologies.
<i>Risks associated with the services provided are identified and mitigated to a level agreed with customers and owners.</i>	

Long Term Objectives	Key Performance Measures
Risk management plans include all significant health and safety, environmental, cultural, social, economic and contractual risks.	No event, which impacts on agreed levels of service, occurs that has not been identified in the NRSBU risk management plans. Customer representatives review and approve the risk management plan annually and following any incidents which require activation of the plan.
Contingency plans adequately address emergency events.	Customer representatives review and approve the plans annually. Effectiveness of plans is reviewed and confirmed following incidents which require activation of the plan.
<i>We engage the right people, with the right skills and experience.</i>	
Those engaged with the NRSBU have the right skills, experience, and support to perform well.	Annual staff performance reviews include assessment of the skills and experience required in their role in NRSBU and their development needs are identified and met. Development and succession plans are in place. The Board reviews its performance at least annually.
Operation and maintenance manuals reflect best practice for the management of the plant and reticulation systems and are followed consistently.	An independent audit every three years confirms this.
<i>NRSBU operates sustainably and endeavours to remedy or mitigate any identified adverse environmental, social or cultural impact</i>	
NRSBU minimises adverse environmental, social and cultural impacts where this is economically viable.	That progress towards meeting energy efficiency targets reported on and reviewed annually in June. Current capacity to utilise beneficial application of biosolids to land is sustained. Beneficial economic and environmental reuse of treated waste water is maintained or increased. Environmental, social and cultural impacts are considered in all decision making.
<i>Good relationships are maintained with all stakeholders</i>	

Long Term Objectives	Key Performance Measures
Shareholders are satisfied with the strategic direction and the economic performance of the business unit.	All strategic and business plans are approved by shareholders. All budget projections are met.
Good relationships are maintained with all stakeholders including owners, iwi, customers, contractors, neighbours, and the wider community.	All complaints or objections are addressed promptly. All applications for resource consents are approved. Up to date information on activities and achievements are publically available.
<i>All statutory obligations are met</i>	
All statutory obligations are identified and met and are included in contracts with suppliers.	100% compliance with all statutory obligations.
All resource consent requirements are met.	100% compliance with all resource consents.

8. THREE YEAR RENEWAL EXPENDITURE FORECAST (\$'000)

Renewal Plan (\$,000)	Projected 2017/18	2018/19	2019/20	2020/21
Miscellaneous	20	20	20	20
Pump Stations and Rising Mains	50	85	67	42
Inlet, Aeration Basin, Clarifier and Ponds	172	188	318	190
Solids Handling	0	119	55	357
Rabbit Island	24	223	38	154
Roads	0	0	0	75
Consents	381	228	136	0
Total =	647	635	1,049	1,014

The renewal programme of NRSBU assets is developed around lifecycle and condition assessment. An iterative process is followed where the renewal programme is considered annually with inputs from the Operation and Maintenance operator and the review of remaining useful life of assets.

Condition assessment reports are commissioned where additional information is required to ensure optimal spend on renewals. This approach works well due to the relatively small number of different assets managed by the NRSBU.

The major components that will be considered for renewal during 2018/19 are:

- PLC Control upgrade at activated sludge and sludge facilities;
- Renewal of ATAD aerator;
- Renewal of aeration basin aerator;
- Sealing of road;
- Renewal of sludge storage tank.

9. NRSBU Capital Upgrade Plan (\$'000)

The following table outlines the capital upgrades proposed over the next three years. This is followed by a commentary outlining more detail on each of the proposals.

Year	Description of Projects	Estimated Costs \$'000
2018/19	Desludging oxidation ponds	1,520,000
	Treatment Plant Upgrade (Consent dependent)	2,500,000
2019/20	Modification Facultative Ponds	420,000
	Treatment Plant Upgrade (Consent dependent)	2,500,000
	Rabbit Island Biosolids Consent	240,000
	Regional Pipeline Upgrade	1,000,000
2020/21	Regional Pipeline Upgrade	6,500,000

Commentary on Upgrade Proposals for 2018/19

Desludging of Ponds: The desludging will be carried out over two financial years. The project is conditional on the outcome of a review of the performance of mixer upgrade in one of the three facultative ponds

Treatment Plant upgrade is conditional on the outcome of the conditions of consent associated with the discharge consent that is currently being applied for.

Modification of ponds is conditional on the review of the performance of improvements made to the final maturation pond.

The consent for the application of biosolids at Rabbit Island expires on 8 November 2020.

Regional Pipeline Upgrade: Conditional on a review of growth projections of wastewater generated in Nelson and Tasman.

10. FINANCIAL PLAN

Nelson Regional Sewerage Business Unit
Budget Summary for 2018 to 2021

	Projection	Budget		
	2017/2018 \$'000	2018/2019 \$'000	2019/2020 \$'000	2020/2021 \$'000
Income				
Contributors	7,533	7,633	7,947	8,266
Interest	0	0	0	0
Other Recoveries	174	174	174	174
Total Income	7,707	7,807	8,1212	8,440
Expenditure				
Operations and maintenance	3,226	3,283	3,290	3,197
Interest	563	619	777	1,004
Insurance	60	60	60	60
Depreciation	1,923	1,870	1,891	1,998
Total Operating Cost	5,772	5,832	6,018	6,259
Surplus/Deficit	1,935	1,975	2,103	2,181
Use of Funds				
Loan Repayment	1,276	1,235	1,256	1,455
Renewals	647	635	635	543
Owners' Distribution	1,935	1,975	2,103	2,181
Upgrades	1,027	4,020	4,160	6,500
	4,885	7,865	8,154	10,679
Sources of Funds				
Surplus/Deficit	1,935	1,975	2,103	2,181
Depreciation	1,923	1,870	1,891	1,998
New Loans	1,027	4,020	4,160	6,500
	4,885	7,865	8,154	10,679

LONG TERM FINANCIAL STRATEGY

The long term financial strategy (Appendix D) is a complete picture of the operations and maintenance costs and capital projects to be undertaken over the next 10 years. This strategy is based on the Nelson Regional Sewerage Business Unit Asset Management Plan 2017.

APPENDIX A

Nelson Regional Sewerage Business Unit

Board Activity Schedule 2017-2018

Date	Activity	Papers required
By 31 August 2018	Review draft Annual Report and Financial Statement.	Draft annual report and financial statement.
By 30 September 2018	Deliver annual financial statement to Councils.	Financial Statement.
By 15 December 2018	Review board planning/meeting timetable. Adopt draft business plan for presentation to Tasman District Council and Nelson City Council. Review and update Interests Register. Adopt business continuity plan.	Planning/meeting timetable. Business Plan. Interests Register. Draft business continuity plan.
By 31 March 2018	Present Annual Report and Business Plan to Tasman District Council and Nelson City Council.	Annual Report and Business Plan.

Date	Activity	Papers required
By 30 June 2018	Review board performance Review governance policy Review Demand Management Plan Receive report on Contingency Plan review by customer representatives. Receive report on Risk Management review by customer representatives. Review customer satisfaction survey results Annual review of Strategic Plan Adopt Energy Conservation Plan Review Audit Management Report	Checklist for board effectiveness. Governance Policy Draft Demand Management Plan. Report on Contingency Plan review by customer representatives. Report on Risk Management review by customer representatives. Customer survey report. Strategic plan. Energy Conservation Programme.

APPENDIX B**LEVELS OF SERVICE**

The following levels of service are included in the Nelson Regional Sewerage Business Unit Asset Management Plan 2014 and compliance demonstrates progress towards achieving the Strategic Goals:

Environmental	Category	Level of Service
Treatment and Disposal	RMA Consent - Wastewater Discharge to Coastal Marine Area	100% compliance with consent conditions
	RMA Consent – Discharge of Contaminants to Air.	100% compliance with consent conditions
	RMA Consent - Discharge of Contaminants to Land	100% compliance with consent conditions
	Equipment Failure of critical components within the treatment and disposal system.	No equipment failures that impact on compliance with resource consent conditions.
Pump Stations	Odour complaints from pump stations	No odour complaints originating from pump stations
	Pump station wet weather overflows	No overflow events occurring for the contracted contributor flows
	Pump station overflows resulting from power failure	No overflow events occurring
	Pump station overflows resulting from mechanical failure.	No overflow events occurring
Pipelines	Reticulation Breaks	No reticulation breaks.
	Air valve malfunctions	No air valve malfunctions that result in overflows

Capacity	Category	Level of Service
Treatment & Disposal	Overloading system capacity	Treatment and disposal up to all contracted loads and flows
Pump Stations	Overloading system capacity	No overflows for all pump stations for the contributor flows
RELIABILITY		
Category	Level of Service	
Treatment & Disposal Pump Stations Pipelines	Equipment failure of critical components	No equipment failures that lead to non-compliance with resource consent conditions

Responsiveness	Category	Level of Service
Treatment & Disposal Pump Stations Pipelines	Speed of response for emergency and urgent maintenance works	Achievement of response times specified in the maintenance contract
	Speed of response for routine and programmable maintenance works	Achievement of response times specified in the maintenance contract

Key Customer Relationships	Category	Level of Service
Treatment & Disposal Pump Stations Pipelines	Customer satisfaction	Agreed levels of service provided to all Customers
		Robust charging structure is in place

Appendix C**BUSINESS IMPROVEMENT PLAN**

This section describes initiatives to improve the efficiency and effectiveness of the Business Unit and is based on the Nelson Regional Sewerage Business Unit Strategic Plan and referenced to the 2017 Wastewater Asset Management Plan.

IP	Description	Resource Requirements	Progress
IP-1	Consolidate all natural disaster information and review 3 yearly.	In-house	Ongoing
IP-2	Renewal of effluent discharge permits.	In-house	Ongoing
IP-3	Develop sludge removal programme.	In-house	Ongoing
IP-4	Review long term plan.	In-house	2018-2020
IP-5	Review AMP.	In house	2018-2020
IP-6	Investigate use of gravity belt thickener for use to thicken secondary sludge..	In-house	2018/2021

APPENDIX D

10 YEAR PLANS

OPERATIONS, MAINTENANCE AND CAPITAL EXPENDITURE

NELSON REGIONAL SEWERAGE BUSINESS UNIT											
10 Year Operations and Maintenance Plan (\$,000)											
	Proj	1	2	3	4	5	6	7	8	9	10
	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28
Total Management	221	225	225	225	225	225	225	225	225	225	225
Total Financial	583	619	777	1004	1297	1465	1437	1412	1405	1389	1446
Depreciation	1923	1870	1891	1998	2128	2193	2193	2200	2215	2230	2237
Total Electricity	820	820	800	800	800	800	800	800	800	800	800
TP Maintenance	938	941	941	935	935	935	935	935	935	935	935
PS & RM Maintenance	245	244	244	244	244	244	244	244	244	244	244
Total Monitoring	184	206	254	184	256	184	184	186	244	254	186
Consultancy	75	75	75	75	75	50	50	50	50	50	50
Insurance	60	60	60	60	60	60	60	60	60	60	60
Rates & Rental	61	61	61	61	61	61	61	61	61	61	61
Water Charges	22	44	44	44	44	44	44	44	44	44	44
Forestry	42	42	20	4	4	4	4	4	4	4	4
Biosolids Disposal	630	623	623	623	623	623	623	623	623	623	623
Telephone/Computers	3	3	3	3	3	3	3	3	3	3	3
Total Expenses	5787	5832	6018	6259	6754	6890	6862	6846	6912	6921	6917

NELSON REGIONAL SEWERAGE BUSINESS UNIT											
10 Year Renewal Plan (\$,000)											
	Proj	1	2	3	4	5	6	7	8	9	10
	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28
Miscellaneous	20	20	20	20	20	20	20	20	20	20	20
Pump Stations and Rising Mains	50	85	67	42	218	168	228	85	344	518	31
Inlet, Aeration Basin, Clarifier and Ponds	172	188	318	190	253	154	173	193	29	697	250
Solids Handling		119	55	63	336	52		8	15	153	105
Rabbit Island	24	223	38	154	47	186	67	233	7	798	
Roads				75		138					35
Consents	381		136								
Total =	647	635	635	543	881	717	434	539	415	2,187	441

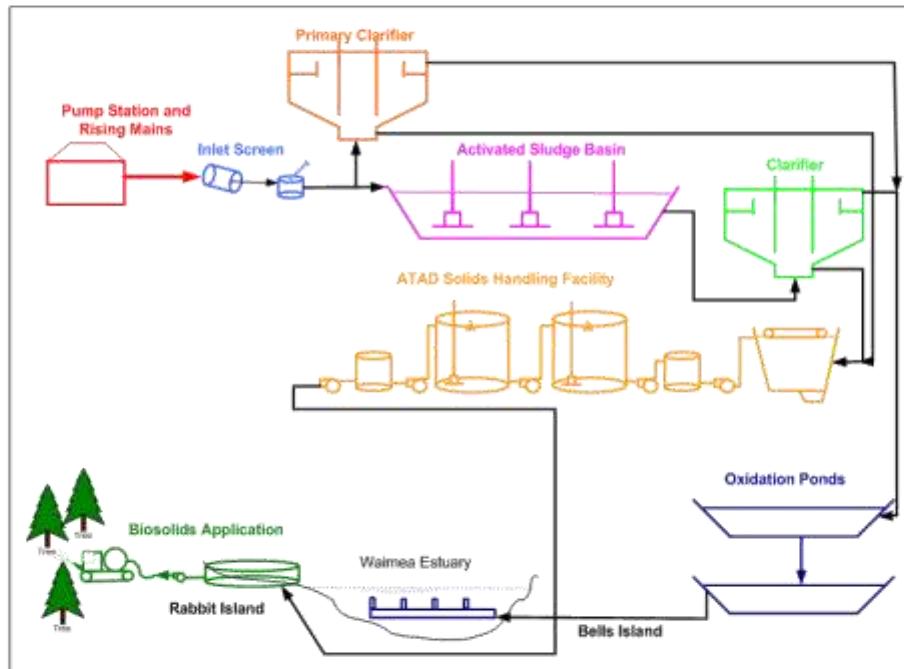
Note: More detailed review of expected life of solids handling facilities and electrical control and equipment are likely to affect the renewal programme.

The renewal programme beyond year 1 is indicative total cost only. Specific renewal items will be subject to condition and lifecycle assessment leading up to the development of the 2018/19 Business Plan.

Upgrade programme		
Year	Description of Projects	Estimated Costs \$
2018/19	Desludging oxidation ponds	1,520,000
	Treatment Plant and Network Upgrade (Bell Island Discharge and Aberrational Discharge Consent dependent)	2,500,000
2019/20	Modification Facultative Pond (Consent dependent)	420,000
	Treatment Plant Upgrade (Consent dependent)	2,500,000
	Regional Pipeline Upgrade (Demand dependent)	1,000,000
	Rabbit Island Biosolids Consent Application	240,000
2020/21	Regional Pipeline Upgrade (Demand dependent)	6,500,000
2021/22	Regional Pipeline Upgrade (Demand dependent)	6,500,000
2024/25	Disposal of dried sludge	700,000
2025/26	Songer street upgrade (Demand dependent)	100,000
	Disposal of dried sludge	700,000
2026/27	Disposal of dried sludge	700,000
2030/31	Activated sludge management (2 nd Secondary clarifier)	2,800,000

APPENDIX E

BELL ISLAND TREATMENT PLANT SCHEMATIC



Supplement to the Draft Business Plan 2018/2019

Commentary on the reduction of adverse Environmental effects

The NRSBU intends to:

- reduce overflow into the marine environment and Tasman Bay beyond
- have a greater focus on the immediate marine environment and impacts on the ecology of Tasman Bay
- consider water quality, biodiversity and estuary health as priorities over the next three years
- reduce the volume of wastewater discharged to Waimea Inlet

To implement this vision, the NRSBU will:

- commence a programme of work to investigate and implement ways to reduce overflows from the sewerage pump stations to the estuary
- implement the Conditions associated with the pump stations Aberrational Discharge resource consent
- undertake a trial to re-use treated wastewater to clean the inlet screens (reducing the use of potable water and consequently the volume discharged to the estuary)
- further develop investigations into the potential re-use (by others) of treated wastewater
- investigate potential tree and vegetation planting around the perimeter of Bell Island
- review the reuse of Biosolids on Rabbit Island to consider if there are any adverse impacts on the marine environment
- continue to operate the treatment plant well and achieve high quality effluent
- commission a high level report into alternative wastewater treatment systems (that would avoid or significantly reduce the discharge of treated wastewater to the Waimea Inlet)



Civic House, 110 Trafalgar Street
PO Box 645, Nelson 7040, New
Zealand

P 03 539 5510
E alec.louverdis@ncc.govt.nz
nelson.govt.nz

28 September 2018

Beca
1st Floor
105 Trafalgar Street
Nelson 7010

Dear Don

NRSBU Business Plan

The Works and Infrastructure Committee resolved on the 28 September as below:

**"10. Nelson Regional Sewerage Business Unit Business Plan
2018-19**

Recommendation

That the Works and Infrastructure Committee

***Receives the report Nelson Regional Sewerage Business Unit
Business Plan 2018-19 (R9503) and its attachments
(A1928704 and A1995125); and***

***Approves feedback be given to the Nelson Regional
Sewerage Business Unit through the Acting General Manager
that further review of the draft NRSBU Business Plan 2018-
19 is required so that it better complements Nelson City
Council's Long Term Plan (LTP) and the Council's
environmental aspirations; and***

***Requests that the Acting General Manager of the NRSBU
reports back to the Works and Infrastructure Committee on
the alignment between the Bell Island resource consent
application and Nelson City Council's Long Term Plan and
the Council's environmental aspirations, and also provides
the Works and Infrastructure Committee with an update on
the engagement with iwi in relation to the resource consent
application."***

Please can you consider the recommendations and action with urgency.

With respect to the further report back to the next Works and Infrastructure committee please note that the next meeting is set down for 15 November 2018. The agenda for this committee goes out on 8 November. Can you please forward your report to me no later than 2 November 2018.

Yours sincerely



Alec Louverdis
Group Manager Infrastructure
Nelson City Council

Alignment between the Bell Island RC Application and the NCC Long Term Plan 2018-28

Resource Consent Application

The NRSBU has submitted an application to renew the existing resource consents that permit the operation of the Bell Island facility.

The plant has operated well for many years, and produces highly treated wastewater which is either used for irrigation on Bell Island or released into the estuary on the outgoing tide.

The system also entails the disposal of biosolids on Rabbit Island, but that activity is covered by a separate resource consent.

In recognition of the significant financial investment at the site, a long term (35 years) is being sought. This would allow the NRSBU to have confidence to invest in upgrades and improvements at the site. By comparison a short term consent would likely result in the status quo treatment system being maintained on modest budgets.

An Assessment of Environmental Effects (AEE) was prepared and submitted with the RC application. The AEE considered both scientifically measurable effects, along with public and tangata whenua viewpoints.

To address some of the concerns about potential environmental effects, the RC application contains a number of proposed conditions.

Condition 5 requires an Annual Report which will include data and provide a record of the performance of the plant.

Condition 6 specifies an Asset Management Plan. This is a new condition volunteered by the NRSBU which requires it to always have an Asset Management Plan in place for the WWTP. The NRSBU currently reviews its Asset Management Plan for the WWTP every three years.

Importantly, in preparing the Asset Management Plan the condition requires the NRSBU to take into account technological changes and advances in relation to wastewater management, treatment, discharge, and beneficial reuse technologies that could be of relevance for possible future use in the Bell Island wastewater treatment and discharge facilities.

Further, the condition also requires the NRSBU, as part of preparing its Asset Management Plan, to assess whether any newly available technology option(s) or combination of options identified represent the Best Practicable Option (BPO) to minimise the adverse effects of the treated wastewater discharge.

This is a significant change of emphasis on behalf of the NRSBU: from the more recent approach of maintaining the well-performing status quo, to requiring pro-active investigation and implementation of appropriate new technologies and alternative treatment methods.

Condition 7 requires an Operations & Maintenance Plan, a Pond Management Plan, and an Odour Management Plan. These documents are to be reviewed and updated periodically; and they set out in considerable detail how the plant is to be run. The reviews of these documents provide the regular opportunity to align operations with new ideas and improved treatment techniques over time.

Condition 12 clarifies the average daily discharge volume to be 20,000m³ calculated on a rolling 365 day average basis.

Condition 14 limits the maximum daily discharge to 25,000m³; and allows a maximum daily discharge to land of 1,040m³. The reason for a higher maximum daily flow is that when assessing potential adverse effects on the estuary, it is considered environmentally preferable to allow for the discharge of more treated wastewater to estuary than to have the risk of overflows at the upstream raw sewage pump stations.

Condition 24 relaxes some of the restrictions on discharge of treated wastewater to land; which will mean that less treated wastewater will need to be discharged into the estuary.

NCC Long Term Plan (LTP)

The NCC LTP contains a number of sections that have some commonality with the NRSBU vision and strategy for the Bell Island Wastewater treatment facility and its operation.

The LTP text is shown in *italics*

Top Two Priorities of the LTP are:

1. *Infrastructure*
2. *Environment*

Environment:

“Council recognises investing in the environment is essential for our future. A healthy environment underpins the health of our community and the way people enjoy Nelson, supports the economy and means we have functioning ecosystems to support our treasured species....”

Infrastructure:

Our city, community and environment all depend on our core infrastructure networks to provide safe and smart ... wastewater..... Key city assets need ongoing maintenance and replacement so we can depend on these essential utilities. This work also enables and protects investment in our city and removes constraints on our growth. Council is putting essential infrastructure at the forefront to future-proof our city.

Projects in one area can bring significant gains for another priority. For example, the accelerated programme to reduce inflow and infiltration into the wastewater system aims to reduce the risk of wastewater overflows into our waterways and Tasman Bay. Fewer overflows mean significant benefits for our environment, and contribute to the smart development of our city.

Environmental Outcomes:

The key environmental challenges and opportunities for our infrastructure relate to improving the quality of ... coastal environments. Water supply, stormwater, wastewater, and transport infrastructure all have potential to affect water quality and aquatic biodiversity in Nelson.

The Council is committed to further assessing the implications of its infrastructure on the natural environment and embedding environmental outcomes in the decision making process. We take a whole of organisation approach to delivering on our environment priority, so some environmental outcomes are also delivered through infrastructure projects.

The Nelson Plan will also include revised rules for stormwater discharges to freshwater and coastal water, and treated wastewater discharges to coastal water. The rules related to wastewater overflows during heavy rainfall events are also likely to become more stringent, and require increased investment in the wastewater network.

Significant investment is proposed to reduce the risk of overflows of wastewater into streams and Tasman Bay during wet weather. Work to renew sections of the network found to be in poor condition began in 2017/18 and is proposed to continue over the next 10 years to tackle this problem.

Wastewater infrastructure is a high priority for Council. Providing a piped wastewater system and wastewater treatment facilities is a core role of Council in order to prevent people from being exposed to diseases associated with wastewater and avoid contamination of the environment. Council aims to provide an efficient system that prevents wastewater from harming people, property or the wider environment.

Community Outcomes:

Council's wastewater activity contributes primarily to the following community outcomes:

Our unique natural environment is healthy and protected

Our infrastructure is efficient, cost effective and meets current and future needs

Our region is supported by an innovative and sustainable economy

(To achieve) safe recreational bathing sites, marine and freshwater...key bathing sites (will be) monitored and public advised if water quality standards (are) breached

Meeting higher environmental standards for fresh and coastal water in partnership with tangata whenua.

Coastal and Marine Environments:

A greater focus on the marine environment is needed because it is so significant to Nelson. Marine biosecurity issues, marine and estuary sedimentation, coastal erosion, and the potential effects of sea level rise also need to be better understood.

Council recognises there is a range of complex issues related to coastal and marine environment including sea level rise, coastal erosion, marine biosecurity, Tasman Bay water quality and biodiversity, and estuarine health. Council has successfully advocated for Tasman Bay and is now launching a new estuarine health monitoring programme across Nelson's four estuaries – Waimea Inlet, The Haven, Delaware Bay and Kokorua Bay - and developing a programme of work to respond to national and regional initiatives in the coastal and marine areas such as the Sustainable Seas National Science Challenge.

Nelson is a place of stunning natural beauty and we treasure, protect and restore our special places, landscapes, native species and natural ecosystems. Our open spaces are valued for recreation and we welcome the many visitors who want to experience our extraordinary natural environment. We recognise the kaitiakitanga (guardianship) role of tangata whenua iwi.

Infrastructure Objective 4: Maintain or Improve Environmental Outcomes

a) Opportunities and Challenges

The key environmental challenges and opportunities for our infrastructure over the next 30 years relate to improving the quality of ... coastal environments.

The environment is one of the Council's top priorities for the next 10 years, with a particular focus on coastal issues, freshwater monitoring, data management and city development.

Wastewater

Stormwater and groundwater entering the wastewater pipes — If households' stormwater pipes have been connected to the Council's wastewater system instead of into the stormwater system, rainwater runoff from roofs and driveways ends up flowing into the wastewater system. (These above ground effects are called inflow.)

Stormwater and natural sources of groundwater also enter the wastewater system if underground stormwater and wastewater pipes are broken. (These underground effects are called infiltration.)

These are significant because inflow and infiltration of groundwater can lead to peak wastewater flows which are 4-6+ times greater than average dry weather flow.

All of the increased flows into wastewater pipes put pressure on the wastewater pipes and the capacity of the wastewater network as a whole, and results in wastewater overflows during wet weather. This has the potential to result in non-compliance with consent conditions and to constrain growth.

If the issues with stormwater entering the wastewater system are not addressed, wastewater overflows will become an even bigger problem in future, as a result of the predicted increase in the frequency and intensity of future rainfall events. That means wastewater contamination of land or water would cause ongoing and increasing impacts on cultural wellbeing, public health and the environment

We take a whole of organisation approach to delivering our environmental priority, so some environmental outcomes will be delivered through infrastructure projects.

The infrastructure discussed in this strategy has some of the biggest impacts on Nelson's water quality and quantity, and aquatic biodiversity. This is both a problem and an opportunity. The Council's service delivery teams are able to work collaboratively, together with Tasman District Council, to deliver core services while also implementing practical, affordable actions to improve environmental outcomes.

The Resource Management Act 1991, the National Policy Statement for Freshwater Management and the New Zealand Coastal Policy Statement all require sustainable management, improvement in water quality (so that it is suitable for human recreation more often)

NCC intends to improve its own network and systems in the following ways:

There is potential to use different technology for wastewater treatment in future, instead of using oxidation ponds which rely on natural processes.

Comply with current consent requirements by reducing stormwater flow into the wastewater system to reduce sewer overflows. (A co-benefit of reduced stormwater flows into the wastewater system is reduced wastewater pumping costs.)

Discussion on Alignment of the RC application with NCC LTP

It is considered that there is strong alignment of environmental visions of both the NRSBU and the NCC. Bell Island has operated well for many years and the environmental impacts have been monitored by reputable organisations such as Cawthron. The AEE concludes that the environmental impacts are low. However, the NRSBU recognises that technology changes and that there are ongoing opportunities to reduce the environmental impacts of the treatment plant.

Consequently the volunteered RC conditions place a formal responsibility on the NRSBU to reduce adverse effects, and to investigate and implement appropriate new technologies.

Demonstrating alignment, it is noted that the NCC LTP identifies the potential for different technologies to be used in the future for its own wastewater facilities.

In seeking a long term for the consent, the NRSBU is seeking the security that will in turn allow for significant investment in future technology improvements at the site. In contrast, a short term consent would likely result in the status quo treatment system being maintained on modest budgets.

Wet weather results in high flow inputs to Bell Island, with corresponding high flow outputs to the estuary and to Tasman Bay. The NRSBU would like to reduce the volume of wastewater discharged to sea; therefore the NRSBU strongly supports and encourages the NCC (and TDC) commitment to significantly reducing inflow and infiltration.

Commentary on the reduction of adverse Environmental effects

The NRSBU intends to:

- reduce overflow into the marine environment and Tasman Bay
- have a greater focus on the marine environment and impacts on ecology of Tasman Bay
- consider water quality, biodiversity and estuary health as priorities over the next three years

Specifically the NRSBU will:

- commence a programme of work to investigate and implement ways to reduce overflows from the sewerage pump stations to the estuary
- implement the Conditions associated with the pump stations Aberrational Discharge resource consent
- undertake a trial to re-use treated wastewater to clean the inlet screens (reducing the use of potable water and consequently the volume discharged to the estuary)
- further develop investigations into the potential re-use (by others) of treated wastewater
- investigate potential tree and vegetation planting around the perimeter of Bell Island
- review the reuse of Biosolids on Rabbit Island to consider if there are any adverse impacts on the marine environment

continue to operate the treatment plant well and achieve high quality effluent

Bell Island WWTP Resource Consent – Iwi Pre-hearing Meeting Notes

The Nelson Regional Sewerage Business Unit (NRSBU) has recently held a series of meetings with several of the submitters, including the three iwi submitters, to the replacement Resource Consents application for the Bell Island Wastewater Treatment Plant (WWTP).

These notes provide a general overview of the discussions – this is intended for NCC Works & Infrastructure Committee internal use only and shall not be distributed more widely.

It is important to note that these meetings were informal pre-hearing meetings (not held under section 99 of the Resource Management Act 1991). They were held on a ‘without prejudice’ basis to encourage free and frank discussion – no formal minutes were recorded or circulated. The purpose of the meetings was to allow submitters to explain points raised in their written submissions and for the NRSBU to explain work done since the close of submission. The submitters were advised that the application had been put ‘on hold’ at the NRSBU’s request until the end of February 2019 to enable further discussions with submitters and for studies and improvement works to be undertaken.

Wednesday 3 October 2018 10:30 a.m. - Wakatu and Ngati Rarua Atiawa Iwi Trust

A meeting with Mike Ingram (Wakatu and Ngati Rarua Atiawa Iwi Trust), Kit Maling and Don Clifford (NRSBU), and Rob Lieffering (Stantec).

Mike summarised the submission and reconfirmed the position that discharges to water are culturally unacceptable and discharges to land are preferred. Ideally move the WWTP away from the current site but accepts that this would be very expensive. Objects to 35 year duration as there will be technological advances.

Wants to ensure no untreated wastewater is discharged to the Waimea Inlet. Don outlined the storage capacity at the plant and that any discharge from the plant, even during wet weather, receives some treatment and is not untreated; unlike discharges from pump stations.

Wednesday 3 October 2018 1:30 p.m. – Ngati Tama ki Te Waipounamu Trust

A meeting with Kura Stafford (Ngati Tama ki Te Waipounamu Trust), Kit Maling and Don Clifford (NRSBU), and Rob Lieffering (Stantec).

Kura briefly summarised their submission and reiterated that discharge to water is culturally unacceptable. Kura queried why a 35 year term was requested and Don/Rob responded that it would provide the NRSBU security to enable further investment in the WWTP.

The NRSBU outlined land irrigation that currently takes place and the potential for reuse of treated wastewater, but that this would still require a significant volume of discharge to water.

Monday 8 October 2018 10:30 a.m.- Te Atiawa o Te Waka-a-Maui Trust

A meeting with Sylvie Heard and Daren Horne (both from Te Atiawa o Te Waka-a-Maui Trust), Kit Maling and Don Clifford (NRSBU), and Rob Lieffering (Stantec).

Daren explained that the two main issues that Te Atiawa has is the discharge of human sewage to water and the location of the WWTP. He explained that there are many sensitive sites in the Inlet and that the area was the food basket and food gathering was not possible when human sewage is discharged.

Daren queried whether there were capacity issues at the plant. NRSBU advised that not at the plant itself but there were occasional issues with pumps stations.

Daren and Sylvie both stated that the 35 year duration sought was too long. Sylvie queried how technological advances would be considered and incorporated if a longer term consent were granted. Rob explained that a condition had been volunteered which would require the NRSBU to consider such advances every time it reviews its Asset Management Plan, which has to be done at least every three years. As part of that review the NRSBU would be required to ensure the discharge continues to be the Best Practicable Option (BPO).

Bell Island Wastewater Treatment Plant Renewal Consents – Summary of Submissions

Name of Submitter	Contact Person	Oppose /Support /Neutral	Grant or Decline?	Wish to be Heard?	Summary	Requested Conditions
Theme #1: Odours						
C B Syme	Carol Syme	Support	Grant	No	Property (139 Barnett Ave, Best Island) regularly affected by odours – considers this to be totally unacceptable	<ul style="list-style-type: none"> • 10 year term, with 5 year review. • Previous conditions complied with • Containment of odours • Odour Management Plan • Meetings with Best Island representatives
J R Syme	John Syme	Support	Grant	Yes	<p>Receives frequent offensive odours (139 Barnett Ave, Best Island).</p> <p>References material from 2002 hearing decision – suggests undertakings have not occurred or have been ineffectual.</p> <p>Considers no new consents should be issued until the NRSBU can demonstrate it can comply with its existing conditions.</p> <p>A fund should be set up to enable problems to be rectified immediately that they occur.</p>	<ul style="list-style-type: none"> • 10 year term, with 5 year comprehensive review. • A Best Island representative should be appointed to meet with the NRSBU at least monthly • Strict adherence to consent conditions • Increased communication with Best Island residents
A M Quinn	Mark Quinn	Support	Grant	Yes	<p>Objects to the “vile” odours that are regularly emitted from the WWTP (lives at 18 Barnett Ave, Best Island).</p> <p>Odours have a huge effect on quality of life by neighbours to the WWTP.</p> <p>Concerned that current conditions not complied with (with no consequence of breaches) and is worried about 35 year term sought.</p>	<ul style="list-style-type: none"> • Limit consent to 10 years. • Ensure conditions are complied with • Regular maintenance to limit odours • Make sure future proofing is ‘built in’ – local growth is booming so will the load to the WWTP

D K Robertson	Donna Robertson	Support	Grant	Yes	<p>Objects to the "fowl" (sic) smell associated with odours (lives at 146 Barnett Ave, Best Island).</p> <p>Normal activities outside her house are disturbed when there are smells from the WWTP and she has to retire into her house and shut the windows.</p> <p>Concerned that current conditions not complied with.</p>	<ul style="list-style-type: none"> • Make NRSBU accountable for ensuring conditions are complied with (especially odour) • If conditions are breached then there needs to be an 'accountable process and control process' for the future • Limit consent to 10 years allowing a review process with growth in the region
T Sellars	Trevor Sellars	Oppose	Decline	Yes	<p>Odour travels from WWTP to Best Island on a regular basis (lives at 131 Barnett Ave, Best Island).</p> <p>Is concerned about inundation risk during flooding.</p>	<ul style="list-style-type: none"> • Strict adherence to the condition that odour not leave the boundary in any direction with heavy penalties imposed if it happens • Plans to move the WWTP to an inland environment where inundation is impossible
Theme #2: Tangata Whenua						
Te Atiawa o te Waka-a-Maui Trust	Sylvie Heard	Oppose	Decline	Yes	<p>Trustees are charged with kaitiaki responsibilities over the area. The area is a significant taonga and the discharge will affect many sites of significance, some of which are recognised by way of Statutory Acknowledgment.</p> <p>Discharge of human effluent to coastal water is culturally abhorrent and culturally insensitive. Considers the applicant is continuing to use the CMA as a waste receptacle and it ignores the significant cultural values attributed to the receiving environment by iwi.</p> <p>Seeking 35 year term appears to mean that there is no impetus or desire to consider alternatives.</p> <p>Application not consistent with Part 2 RMA, doesn't address various policies of the NZCPS, is contrary various provisions of the TRMP, and frustrates the provisions</p>	None stated

					and intent of the recent Treaty of Waitangi settlement agreement. Adverse environmental effects are more than minor, including cumulative effects.	
Wakatū Incorporation and Ngāti Rārua Ātiawa Iwi Trust	Mike Ingram	Not stated	Not stated	Yes	<p>Objects to any form of discharge to water, whether treated or not. Any such discharges are culturally unacceptable.</p> <p>Requests that the application pursue an alternative location away from the coastal area or a form of discharge that does not discharge to water – the submitter acknowledges that the NRSBU has considered alternatives. This study should be undertaken within 5 years.</p> <p>Objects to duration sought. Request that the duration be reduced to 20 years.</p> <p>Any operation of the WWTP should be consistent with the principles identified in the Waimea Inlet Management Strategy.</p> <p>Requests that Cultural Health Indices be established and reported on a regular basis.</p> <p>Sufficient storage should be provided to ensure no untreated wastewater escapes to the Waimea Inlet during heavy inflow events or plant failure.</p>	<ul style="list-style-type: none"> • Requirement to consider alternatives which do not result in discharges to water – to be undertaken within 5 years. • Reduce term to 20 years. • Cultural Health Indices be established and reported on. • Adequate storage to ensure no discharge of untreated wastewater to the Waimea Inlet.
Ngāti Tama ki Te Waipounamu Trust	Kura Stafford	Neutral	Not stated	Yes	<p>Ngāti Tama ki Te Waipounamu Trust is an iwi authority and the governance entity for Ngāti Tama ki Te Tau Ihu.</p> <p>Ngāti Tama ki Te Waipounamu Trust is a member of Tiakina te Taiao who completed the CIA which recommended future land disposal – the submitter supports this recommendation.</p>	<ul style="list-style-type: none"> • Reduce term to 15 years • Require natural and ecological values to be protected, enhanced, and maintained to improve the natural character of Bell Island and to provide a net benefit to the environment and provide habitat for birds, breeding fish, and for rongoa • Enable Ngāti Tama to undertake cultural health monitoring programmes

					<p>Land based disposal will avoid adverse effects on water quality and cultural values.</p> <p>Carrying capacity of the WWTP and the area maximised on Bell Island will be insufficient to meet future population growth demands.</p> <p>The CMA should not have to absorb further degradation and cumulative effects – effects on mauri of the coastal waters, habitats, native fisheries, birds, rongoa and kai species.</p> <p>Effects of future storm events on the infrastructure must be considered.</p>	<ul style="list-style-type: none"> • Archaeological sites be protected and enhanced – strategic planting along the shoreline • Native trees and shrubs are used in restoration planting • Iwi monitor to be on site during any future soil or physical works • That the NRSBU make provision for Ngāti Tama Iwi representative to the Board selected by Ngāti Tama ki Te Waipounamu Trust consistent with the Treaty of Waitangi and Deed of Settlement obligations and Customary Marine Title provisions. • That the structural integrity of the infrastructure meets the highest standards to avoid damage and degradation to coastal values of Ngāti Tama
Theme #3: Discharge to Land						
Greenacres Golf Club	Stuart Anderson	Support	Grant	Yes	<p>Consideration of alternatives does not include costings to justify statement that application to land is prohibitive and not a practical option.</p> <p>Discharge to the Inlet is not sustainable given the ecological balance. Snapper spawning and shellfish areas are under pressure and have been affected by discharges, including from the WWTP.</p> <p>Long term solution is to dispose all the wastewater to land by establishing infrastructure and treatment to enable reuse, including the Golf Course.</p> <p>Increase in N loads of 17% and metals over term of consent sought must be considered more than minor effect in the context of future fisheries and general health of the region.</p>	<ul style="list-style-type: none"> • 5 year term • Requirement for a Future Disposal Plan to be provided within 3 years – being a programme for total discharge to land.

					35 year term does not capture purpose and principles of the RMA and does not provide an incentive to move to land disposal.	
Nelson Golf Club Incorporated	James Cooper	Oppose	Decline	Yes	<p>Objects to continued discharge given significant rise in wastewater due to growth.</p> <p>Continued discharge without mitigation can risk effects on benthic condition of the seabed, fauna and kai moana.</p> <p>Risks to regional brand reputation.</p> <p>Considers conclusion that increased TN will 'unlikely' result in adverse effects is unacceptable and also questions heavy metals in the wastewater.</p> <p>Does not accept that costs have been sufficiently weighed against savings for TDC/NCC using town supply water for irrigating recreation and sporting field usage. Given lack of detailed costings the NGC reject that likely costs are prohibitive.</p> <p>Considers the application has ignored technical advances in treatment and disposal to land via irrigation. Land application is used in other parts of NZ for some years – better to use treated wastewater than town supply.</p> <p>Considers application should be declined until such time as a clear plan and undertaking is provided to commence discharge of treated wastewater to land using and extending (sunk) capital assets such as the existing pipe from Bell Is to Monaco.</p>	<p>If consent is to be granted then:</p> <ul style="list-style-type: none"> • Impose a requirement that treated wastewater be provided for discharge within the regional community within 12 months at a capacity of 10% of total wastewater generated for outflow
Theme #4: Public Health						

Nelson Marlborough District Health Board	Geoff Cameron	Neutral	Not Stated	No	<p>Has responsibilities to ensure adverse effects on the health of people are minimised/improved.</p> <p>Notes the results of the QMRA (in particular at Rabbit Is and Tahunanui) are predicated on the wastewater needing to be well treated to ensure sufficient log removal of viruses.</p> <p>Notes (but does not comment on):</p> <ul style="list-style-type: none"> • Same discharge standard for faecal coliforms has been applied for. • To date the discharge has met the faecal coliform discharge standards • The 20% increase in load over 35 years is unlikely to lead to a significantly increased frequency of exceedance of bathing water quality 	<ul style="list-style-type: none"> • Review of all faecal coliform discharge compliance monitoring data within 3 years of consent being granted • A review of the faecal coliform discharge limits with a view of “tightening the existing compliance limits” (supports the increased frequency of monitoring to fortnightly)
Theme #5: Waimea Inlet						
Waimea Inlet Forum	David Sissons	Support	Grant	No	<p>WIF set up to implement the Waimea Inlet Management Strategy (WIMS). Meets monthly.</p> <p>WIF has observed the NRSBU to be environmentally aware and keen to do its best to keep the Waimea Inlet healthy and to make it better for the future. This is reflected in the current application.</p> <p>Supports NRSBU’s intention to establish a management regime for the protection and enhancement of natural and ecological values on Bell Island (pgs 95-96 of AEE).</p> <p>Notes concerns of some tangata whenua about effects on mauri, but notes that the NRSBU intends to seek resolution by</p>	None stated

					appointing one board member representing iwi to provide guidance on cultural matters.	
Department of Conservation	Roy Grose	Oppose (in part)	Not stated	Yes	<p>Department has an interest in the Waimea Inlet as it is a significant habitat for wading birds. Discharge of contaminants has the potential to cause adverse effects, including on natural character and habitats.</p> <p>Acknowledges that the discharge (beyond mixing zone) have been shown to be minor. Supports the proposed changes to the treatment system (and operation) and the monitoring programme.</p> <p>Duration sought is considered excessive. A shorter term would allow the activity to be reconsidered against changes in technologies and community attitudes to discharges to the CMA. Shorter term will also encourage further consideration of alternatives in response to these changes.</p>	<ul style="list-style-type: none"> • Duration limited to 20 years
Industries						
Alliance Group Limited	Terry Kreft	Support	Grant	No	<p>Plant employs ~230 people and exports meat throughout the world to ~65 countries.</p> <p>Contributes \$10 million to local economy through salary/wages and \$5 million in services and materials.</p> <p>Alliance relies on the WWTP to accept the pre-treated wastewater from the plant.</p>	None stated
Nelson Pine Industries Limited	Philip Wilson	Support	Grant	No	<p>Plant is a major processor of wood from the Nelson region and a significant employer.</p> <p>Waste water from the plant is treated by the NRSBU at the WWTP. The plant relies on the WWTP.</p>	None stated

					<p>New technologies have been applied which have resulted in decreased loads from the plant, thereby allowing additional capacity for population growth without additional capital expenditure at the WWTP.</p> <p>NRSBU has consistently met its discharge consent requirements.</p> <p>The WWTP is a critical infrastructure servicing both Nelson and Tasman plus three industries.</p> <p>Many years of monitoring have demonstrated no detrimental impact from the discharge.</p> <p>Strongly supports a 35 year duration for the consents.</p>	
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Name of Submitter	Oppose/Support/Neutral	Grant or Decline?	Wish to be Heard?	Theme
C B Syme	Support	Grant	No	Odours
J R Syme	Support	Grant	Yes	Odours
A M Quinn	Support	Grant	Yes	Odours
D K Robertson	Support	Grant	Yes	Odours
T Sellars	Oppose	Decline	Yes	Odours and location of plant
Te Atiawa o te Waka-a-Maui Trust	Oppose	Decline	Yes	Tangata whenua
Wakatū Incorporation and Ngāti Rārua Ātiawa Iwi Trust	Not stated	Not stated	Yes	Tangata whenua
Ngāti Tama ki Te Waipounamu Trust	Neutral	Not stated	Yes	Tangata whenua
Greenacres Golf Club	Support	Grant	Yes	Discharge to land
Nelson Golf Club Incorporated	Oppose	Decline	Yes	Discharge to land
Nelson Marlborough District Health Board	Neutral	Not Stated	No	Public health
Waimea Inlet Forum	Support	Grant	No	Waimea Inlet
Department of Conservation	Oppose (in part)	Not stated	Yes	Waimea Inlet
Alliance Group Limited	Support	Grant	No	Industry
Nelson Pine Industries Limited	Support	Grant	No	Industry