

Submitted to Fast-track approval applications  
Submitted on 2024-05-03 15:37:23

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:  
Invercargill City Council

2 Contact person

Contact person name:  
s 9(2)(a)

3 What is your job title

Job title:  
Three Waters Operational Manager

4 What is your contact email address?

Email:  
s 9(2)(a)

5 What is your phone number?

Phone number:  
s 9(2)(a)

6 What is your postal address?

Postal address:  
s 9(2)(a)

OR

s 9(2)(a)  
[Redacted]  
[Redacted]

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

Bluff Wastewater Treatment Plant and associated disposal infrastructure  
53 McGorlick Street  
Bluff.

Please refer to the uploaded aerial imagery showing the site of the Bluff Wastewater Treatment Plant.

The wastewater treatment plant is located within SL12A/869 being a fee simple title of 8.0060 ha more or less legally described as Lot 1 DP 15211.

The stopped road immediately west of the site is crossed by the outfall pipe from the wastewater treatment plant. It is described in Survey Plan SO9702 (Southland).

Please refer to the combined record of title and survey plan.

File upload:  
Aerial Imagery - Bluff Wastewater Treatment Plant.pdf was uploaded

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Do you have a current copy of the relevant Record(s) of Title?

Yes

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Who are the registered legal land owner(s)?

Please write your answer here:

Invercargill City Council owns the land on which the Wastewater Treatment Plant is located.

The outfall pipe crosses land that it is understood to be held for conservation purposes pursuant to section 62 of the Conservation Act 1987, and accordingly will be administered by the Department of Conservation.

Invercargill City Council has been working collaboratively with Te Ao Marama Incorporated, as nominated representatives for Te Runanga o Awarua and Waihopai Runaka (being the relevant Runanga o Ngai Tahu).

One outcome of the partnership process undertaken to date is that the "status quo option" (direct discharge of treated wastewater to coastal marine area) did not make it from the Long List to the Short List. The four options on the Shortlist all require additional investment in either:

- Post-treatment land or wetland contact to restore mauri prior to discharge to coastal marine area; or
- Full or partial discharge of wastewater to land.

The best practicable option is being selected between March and September 2024. If a land-based disposal option is pursued, additional land will be needed. The particular land has not yet been identified, although there are a range of suitable options.

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

Invercargill City Council owns the land on which the Wastewater Treatment Plant is located.

The outfall pipe crosses land understood to be administered by the Department of Conservation.

Invercargill City Council does not yet own the land for the land disposal options. However this option will only proceed in the event that Invercargill City Council acquires the necessary land.

## Section 2: Project details

What is the project name?

Please write your answer here:  
Bluff Wastewater Treatment Plant and Disposal Infrastructure Approvals

What is the project summary?

Please write your answer here:

Bluff's existing wastewater treatment and disposal system has a resource consent that expires in December 2025. Invercargill City Council is currently working with Mana Whenua to settle the final details of the new disposal system to serve the Bluff community and enable aquaculture and fishing

industry growth for the future.

What are the project details?

Please write your answer here:

Details: This project is critical for the Bluff community as it seeks to secure all approvals needed for wastewater infrastructure that will meet the Bluff community's current and future wastewater servicing needs. This is essential for the functioning of the community as well as for ongoing economic development.

Purpose: The purpose of this project is obtain the approvals needed for the construction and operational components of Bluff's existing and proposed new wastewater infrastructure.

Objectives: The applicant (ICC) is well advanced in its collaborative work with iwi and stakeholders to determine the best practicable option (BPO) to deliver the necessary infrastructure.

1. Provide a safe and reliable wastewater treatment and disposal system for the Bluff community.
2. Provide a disposal solution that is technically feasible, affordable and deliverable.
3. Reflect a partnership process that meets the commitments of the Charter of Understanding He Huarahi mo Nga Uri Whakatipu.
4. Reflect the outcome of meaningful and constructive consultation with stakeholders and the community.
5. Form the basis for approvals that provide the community with certainty for this essential infrastructure service.

Activities: The key activities for the project are:

1. RMA Approvals from Southland Regional Council

- Coastal permit - to discharge to coastal marine area;
- Coastal permit - to occupy the coastal marine area with an outfall pipeline conveying treated wastewater;
- Land use consent - for earthworks for site contouring and placement of material (for wetland and/or rock filter construction); and
- Discharge permit - to discharge of contaminants to land (potential seepage below existing wastewater treatment ponds).

For the options that include a discharge of treated wastewater to land, the activities would also include:

1. RMA Approvals from Southland Regional Council

- Discharge permit - to discharge treated wastewater to land;
- Discharge permit – discharge of contaminants (odour) to air;
- Land use consent - to bridge any watercourses (required for reticulation from the wastewater treatment plant to the disposal site); and
- Land use consent - for earthworks for site contouring at the disposal site and installation of irrigation equipment.

2. RMA Approvals from Invercargill City Council

- New designation in District Plan - for land-based disposal site;
- Land use consent - for pipe reticulation from the wastewater treatment plant site to land disposal site.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

No staging.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource consents and a new designation are sought under the Resource Management Act 1991.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Environment Southland and Invercargill City Council.

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

No previous applications.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

No. Invercargill City Council is the wastewater utility provider.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Land Contact Option (Meets LTP budgets)

Funding: Draft Long-Term Plan 2024-2034 § 9(2)(b)(iv) committed over four years to 2028 in the Infrastructure Projects Capital Program.

Design: Commence Oct 2025, post consent approval, 6 months to March 2026.

Procurement: 4 month duration - July 2026.

Construction: 12 month duration to June 2027.

Land Treatment Option

Land Acquisition: Commence Oct 2025, 3 year process, Oct 2028

Design 10 months to July 2029

Procurement: 6 months to Feb 2030

Construction: 12 months to Feb 2031

### Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

- Southland Regional Council (relevant local authority)
- Te Rūnanga o Ngāi Tahu (applicant group under the Marine and Coastal Area (Takutai Moana) Act 2011)
- Te Rūnanga o Awarua (relevant iwi authority)
- Waihōpai Rūnaka (relevant iwi authority)
- Minister of Conservation (administers land traversed by outfall pipe)

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Te Rūnanga o Ngāi Tahu and Invercargill City Council are working in partnership under the Charter of Understanding (He Huarahi mō Ngā Uri Whakaturu/A Pathway for the Generations Coming Through) through its representative Te Ao Marama Incorporated (TAMI).

Te Rūnanga o Awarua, Waihōpai Rūnaka and TAMI have been integrated in the options assessment process from the inception of the project, both at Primary Infrastructure Governance Group level and via attendance at a working group to consider and refine options for Bluff's wastewater treatment and disposal.

This engagement has both informed and shaped the options being considered, as described below:

1. First part of best practicable option (BPO) selection process up to shortlist (This has been completed) - Invercargill City Council has completed the first phase of the BPO process, having made good progress working collaboratively with Te Ao Marama Incorporated, as nominated representatives for Te Rūnanga o Awarua and Waihōpai Rūnaka). Specifically:

- An initial "Long Long" list of 24 options was prepared;
- Following workshop, the Long Long List was reduced to 8 options on a Long List;
- Following options evaluation and workshop, the Long List was reduced to 4 options on a Short List.

One outcome of the partnership process undertaken to date is that the "status quo option" (direct discharge of treated wastewater to the coastal marine area) did not make it from the Long List to the Short List. The four options on the Shortlist all require additional investment in either:

- Post-treatment land or wetland contact to restore the mauri of the water prior to its discharge into the coastal marina area; or
- Full or partial discharge of wastewater to land.

These options will involve the installation of some combination of:

- Rock filter
- Wetland; and/or
- Land disposal field.

2. Selection of BPO – this activity is being undertaken in the March to September 2024 period. Following detailed consideration of shortlisted options, and further workshops with TAMI, the BPO will be selected.

Engagement with Southland Regional Council has confirmed that it is content to become involved at the stage that resource consents are applied for.

Engagement with the Department of Conservation resulted in it requesting a summary email, which has been provided. Relevant contact persons have been nominated.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

None undertaken.

#### Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The Ngāi Tahu Treaty Settlement applies to the location of this project.

Section 12 of the Settlement Deed and Part 12 of the Ngāi Tahu Claims Settlement Act 1998 (NTCSA), which cover Mahinga Kai including statutory acknowledgment areas, are most relevant to this project.

Section 207 of the NTCSA provides that regulations can be made providing for consent authorities to forward a summary of applications received for resource consents for activities within, adjacent to, or impacting directly on statutory acknowledgement areas.

Under reg 3 of the Ngāi Tahu Claims Settlement (Resource Management Consent Notification) Regulations 1999, a consent authority must forward to Te Rūnanga o Ngāi Tahu (TRONT) a summary of every application for a resource consent for activities within, adjacent to, or impacting directly on a statutory area.

The Motupōhōe/Bluff Hill statutory acknowledgement area is not directly adjacent, but nevertheless nearby.

The statutory acknowledgment for Motupōhōe (Bluff Hill) is at sch 44 of the NTCSA. Te Rūnanga o Ngāi Tahu are the statutory advisor for the Reserve.

The acknowledgment includes:

“Oral traditions say that the Ngāti Mamoe leader, Te Rakitauneke, is buried upon this hill. Te Rakitauneke’s saying was: “Kia pai ai tāku titiro ki Te Ara a Kiwa” (“Let me gaze upon Foveaux Strait”). Some traditions also place another Ngāti Mamoe leader, Tū Te Makohu, on this hill.

For Ngāi Tahu, histories such as this represent the links and continuity between past and present generations, reinforce tribal identity and solidarity, and document the events which shaped Ngāi Tahu as an iwi.

The mauri of Motupōhue represents the essence that binds the physical and spiritual elements of all things together, generating and upholding all life. All elements of the natural environment possess a life force, and all forms of life are related. Mauri is a critical element of the spiritual relationship of Ngāi Tahu Whānui with Motupōhue.”

The purposes of the statutory acknowledgement area include:

- to require consent authorities to forward summaries of resource consents applications to Te Rūnanga o Ngāi Tahu as required by regs made pursuant to s 207 NTCSA.
- to require that consent authorities have regard to this statutory acknowledgement in relation to Motupōhue.

The Rakiura/Foveaux Strait Coastal Marine Area is an affected statutory acknowledgment area. The following provisions in the statutory acknowledgment (sch 104 of NTCSA) are relevant:

- “Important villages along the coast included: ... Awarua (Bluff).”
- “The mauri of the coastal area represent the essence that binds the physical and spiritual elements of all things together, generating and upholding all life. All elements of the natural environment possess a life force, and all forms of life are related. Mauri is a critical element of the spiritual relationship of Ngāi Tahu Whānui with the coastal area.”

The purposes of the statutory acknowledgment include:

- to require that consent authorities forward summaries of relevant resource consent applications to Te Rūnanga o Ngāi Tahu as required by regulations made pursuant to s 207; and
- to require that consent authorities have regard to the statutory acknowledgment.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

N/A

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

There are no protected customary rights orders or agreements applicable.

Upload your assessment if necessary:

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## Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

Please see uploaded document regarding anticipated and known adverse effects.

Upload file:

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## Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

Relevant national policy statements and standards:

This project is consistent with the applicable national policy statements which are:

- New Zealand Coastal Policy Statement 2010; and
- National Policy Statement on Urban Development 2020

Before we proceed to summarise why this conclusion is reached, please note that we comment at the end of this section about why the following are considered to be not relevant:

- National Policy Statement on Freshwater Management 2020;
- National Environmental Standards for Freshwater 2020

New Zealand Coastal Policy Statement 2010 (NZCPS)

For our assessment below, we draw upon the partnership approach used for the BPO selection process (described above); the excellent compliance record of the existing wastewater treatment plant and discharge; and also the fact that this project seeks to invest further (status quo has not been selected for the shortlist, as noted above).

The Council is confident that the shortlisted options, from which the BPO will be selected in September this year, are all consistent with the relevant objectives of the NZCPS, specifically:

- Objective 1 (safeguarding integrity, form, functioning and resilience of coastal environment and ecosystems);
- Objective 3 (principles of Treaty of Waitangi and recognising role of tangata whenua as kaitiaki);

- Objective 4 (public open space and recreation values of coastal environment)
  - Objective 6 (provision for social, economic, cultural wellbeing and health and safety)
- The Council also considers the project consistent with the NZCPS policies, specifically:
- Policy 2 (Treaty of Waitangi, tangata whenua and Maori heritage)
  - Policy 6 (Activities in the coastal environment)
  - Policy 23 (Discharge of contaminants)

The Council's full application will address these in detail but for current purposes we note that:

- The BPO selection process, and the joint Invercargill City Council/Runanga Governance Group process, are examples of how Invercargill City Council recognises Ngai Tahu's traditional and continuing cultural relationship with the coastal environment and their involvement in decision making (Policy 2(a) and (d))
- The NZCPS recognises that the provision of infrastructure in the coastal environment is important for the social, economic and cultural wellbeing of people and communities (policy 6(1)(a));
- Policy 23 provides the most specific policy directive of relevance for this project, and so is stated in full:

In managing discharge of human sewage, do not allow:

- (a) discharge of human sewage directly to water in the coastal environment without treatment; and
- (b) the discharge of treated human sewage to water in the coastal environment, unless:
  - (i) there has been adequate consideration of alternative methods, sites and routes for undertaking the discharge; and
  - (ii) informed by an understanding of tangata whenua values and the effects on them.

The BPO selection process is consistent with clause (b) above. The fact that the status quo discharge has not been included in the shortlist (despite a good compliance record and the cost constraints that apply when applying wastewater services for a small community) is the result of genuine listening and a desire for continuous improvement. All four shortlisted options will involve treatment, then earth/rock or wetland contact prior to discharge to the wider receiving environment.

#### National Policy Statement on Urban Development 2020

The NPS-UD was updated in May 2022 (and, at the time of writing, is in line for further amendment during 2024). The most relevant objectives are:

- Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.
- Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

The NPS-UD policies relating to the nature of urban built form are not directly relevant but the collective policies also emphasise the importance of enabling development capacity and enabling urban environments to evolve over time. In relation to the development capacity of urban areas, clause 3.4(3) expressly refers to the concept of being "infrastructure-ready", in the short term, medium term and long term. This project is fully consistent with these policies in that it provides critical wastewater infrastructure for the Bluff community, now and in the future.

#### Comment on other national policy statements and standards

The National Policy Statement on Freshwater Management 2020 (NPS-FM) will be assessed for completeness in the final application but is currently considered to be not relevant because:

- The BPO selection process already undertaken has resulted in the rejection of any options that would discharge to freshwater (watercourses or aquifers); and
- Potential land disposal sites have been identified where eventual ground seepage would lead to the coastal marine area as opposed to freshwater bodies.

The National Environmental Standards for Freshwater 2020 (NES-F) will be assessed for completeness in the final application but are currently considered to be not relevant because the shortlisted options involve artificial constructed wetlands only. Should the final BPO be for land disposal, the site selection will factor in the need to avoid proximity to any waterways or natural wetlands, so as to ensure that the NES-F are not contravened.

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## Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

The fast-track process, when compared to the RMA, will provide for the more timely processing of resource consents and designations required for the Bluff Wastewater Treatment Plant, therefore making the process more cost-effective for Invercargill City Council and the ratepayers of Invercargill District. This is particularly important in the context of a well-functioning wastewater treatment plant effectively servicing a small community while providing

opportunities to expand existing aquaculture and fishing industry activities.

Processing under the RMA is likely to require public or, at the least, limited notification of the application. If the resource consents and designation are notified, it can be assumed that a council level hearing will also be held. The statutory timeframe for the processing of a fully notified application, with a council level hearing, is 130 working days (which equates to approximately six months). If an Environment Court appeal is lodged, this timeframe is extended significantly, with a corresponding increase in cost and a delay in reapproving well-functioning local infrastructure.

In contrast, the fast-track process expressly precludes public (or even limited) notification of an application and there is no requirement for a hearing by the Expert Panel (although it may decide to hold one). For listed projects, the Panel must issue their comments no later than 25 working days following the receipt of submissions.

By limiting notification, and avoiding the need for an Environment Court hearing, the costs of the project are reduced. The benefits of these reduced costs are relevant to all ratepayers of the Invercargill District and will ensure that appropriate infrastructure remains authorised in Bluff to support further development of the aquaculture and fishing industries.

The Council's concern about the length of time consenting such infrastructure takes has a basis. The Woodville wastewater treatment plant services a similarly sized community, of around 1,400. That plant finally secured a renewed consent in December 2022, the result of an application lodged by Tararua District Council in October 2010.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

The Bluff Wastewater Treatment Plant is existing infrastructure. Its environmental effects are well known and it is unlikely that the evidence of these effects will be seriously challenged. The application seeks a new discharge consent to replace its existing consent that expires in December 2025. The existing discharge is high quality, with very low impacts on receiving waters (Invercargill City Council Sewerage Asset Management Plan 2021, p 59). The new consent seeks to improve the environmental effects of the discharge, reducing the adverse effects of the Wastewater Treatment Plant.

There is no community concern in relation to this project. Mana whenua have been and continue to be involved in the project in a fulsome way in accordance with the Bluff WWTP Consenting Project: Engagement and Communication Plan. Consultation with members of the community indicate support for the project, particularly from aquaculture and fishing industry members with plans for expansion.

These factors might lead an expert panel considering the Bluff Wastewater Treatment Plant approvals under the fast track legislation, having invited comments from relevant parties (which we would expect to be relatively limited in number), to consider a hearing to be unnecessary.

It is not expected that processing the application would put a significant strain on the fast track process or in any way impede its efficient operation.

Has the project been identified as a priority project in a:

Local government plan or strategy

Please explain your answer here:

In Invercargill City Council's Draft Long Term Plan 2024 - 2034, specific reference is made to three waters infrastructure, including how Invercargill City Council will work with Central Government and its Iwi partners around to plan for changes required to the way it discharges wastewater. The funding put aside for the Bluff wastewater discharge is s 9(2)(b)(ii) budgeted to 2027/28 for this project.

Will the project deliver regionally or nationally significant infrastructure?

Regionally significant infrastructure

Please explain your answer here:

The Bluff Wastewater Treatment Plant is regionally significant infrastructure. The upgrades are required to provide the continuous security of wastewater treatment for a realistic duration (30 years).

Regionally or nationally significant infrastructure is not defined in the FTA Bill or the RMA, however national policy statements have defined it with reference to regional policy statements (RPS) and regional plans. The Southland RPS includes the following definitions of regionally significant infrastructure, and critical infrastructure:

Regionally significant infrastructure:

infrastructure in the region which contributes to the wellbeing and health and safety of the people and communities of the region, and includes all critical infrastructure.

Critical infrastructure:

infrastructure that provides services which, if interrupted, would have a significant effect on the wellbeing and health and safety of people and communities and would require reinstatement, and includes all strategic facilities.

The Bluff Wastewater Treatment Plant would come within the definition of 'critical infrastructure' on the basis that, if interrupted, this would have a significant impact on the wellbeing and health of residents. There is no on-site disposal of wastewater by residential properties in the town of Bluff, and no alternative treatment or disposal system for the fishing and aquaculture industries that are based there. In that regard Bluff is strategically significant as the only industrial port on Foveaux Strait providing services and downstream processing for the fishing and aquaculture industries.



Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

The Bluff Wastewater Treatment Plant enables the reliable and safe removal of sewage and trade wastes from residential, commercial and industrial properties in urban areas of Bluff. It provides for sewage from Bluff's residential and working population as well as processing trade wastes. The average daily volume of combined waster discharged from the wastewater treatment plant is around 1300 m3/day. This includes a domestic contribution of around 500m3/day (for a population of around 1700 people) and 800 m3/day for trade waste.

The Council's draft Infrastructure Strategy for 2024 – 2054 identifies the need for infrastructure upgrades, including in respect of sewerage, to service the forecast growth needs of businesses and / or residential properties in the area. The upgrades to the Bluff Wastewater Treatment Plant enable the Council to provide for and manage this growth.

The National Policy Statement on Urban Development 2020 defines well-functioning urban environment with reference to enabling a variety of homes to meet the needs of different households, and enabling a variety of sites suitable for different business sectors. The application is required to meet this purpose, and paves the way for the continued functioning and growth of Bluff's urban (industrial and residential) areas.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The continued operation of the Bluff Wastewater Treatment Plant, will enable further growth of fisheries and aquaculture processing industries in the area through effective discharge of trade waste with a high salt load. Properly managed, commercially successful aquaculture development has the potential to make a significant contribution to Southland's economic and social wellbeing (Southland Aquaculture Strategy).

The listing of the Bluff Wastewater Treatment Plant in Schedule 2 of the Bill will also enable other new developments to establish knowing the wastewater treatment infrastructure will support their development. These economic benefits could be significant for a town the size of Bluff.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

Following the announcement that Tiwai Point aluminium smelter will close at the end of 2024, the Government committed to investing in helping Southland build its economic, environmental and social resilience through and beyond the closure of the smelter. Critical to achieving this purpose, is supporting the development and continued growth of new and existing primary industries (Great South, Just Transition Work Plan).

Beyond 2025 Southland Regional Long Term Plan identifies the proposal to grow aquaculture in Southland to become a \$1 billion industry by 2035. This would equate to the region increasing its salmon production from 5000T per annum to approximately 40,000T.

Existing regional strategies (ie the Southland Aquaculture Strategy) and community engagements have highlighted substantial local opportunities in open ocean aquaculture. For example, engagement identified that various established fishing and aquaculture processing industries are all forecasting growth, and planning for increased production.

The Bluff Wastewater Treatment Plant was specially designed and built to enable the processing of wastewater with a high salt levels so that it can process trade wastes from marine activities. Importantly, it has the capacity to treat more wastewater, with higher salt levels, than Bluff currently produces. This means it is uniquely placed to enable the processing of wastewater associated with both the existing, and an expanded, aquaculture industry.

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

N/A

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

The upgrades to the Bluff Wastewater Treatment Plant will not in itself mitigate climate change, or result in a reduction of greenhouse gas emissions. However, it also will not increase greenhouse gas emissions. If the Council was unable to use the Bluff Wastewater Treatment Plant, and had to instead build a new facility, this would result in significantly increased greenhouse gas emissions (given the greenhouse gas emissions associated with the

construction of new infrastructure). Against this counterfactual, the Bluff Wastewater Treatment Plant upgrade results in a net benefit in terms of climate change mitigation.

Further, while the Invercargill City Council Greenhouse Gas Inventory Report for the 2022 -23 financial year notes that emissions from Wastewater Treatment Plants accounted for most of the Council's greenhouse gas emissions (36%), the large majority of these are associated with the Clifton Wastewater Treatment Plant (approximately 35% of the Council's greenhouse gas emissions). Therefore, the emission profile of the Bluff Wastewater Treatment Plant is already quite low.

Will the project support adaptation, resilience, and recovery from natural hazards?

No

Please explain your answer here:

Will the project address significant environmental issues?

Yes

Please explain your answer here:

The Bluff Wastewater Treatment Plant upgrades is essential for the continued treatment of sewage and trade wastes in the Bluff area.

From a public health perspective, the discharge of partially treated or untreated wastewater poses a health risk to people through direct contact with untreated wastewater. This commonly results in gastro-intestinal upsets (enteric illnesses), but can also lead to more serious conditions caused by viruses and parasites. The continued operation of the Bluff Wastewater Plant is required to protect against these health risks.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

Yes. This project is consistent with the applicable regional and local policy statements which are:

- Operative Southland Regional Policy Statement 2017
- Operative Regional Coastal Plan for Southland 2013
- Partially operative Southland Regional Water and Land Plan

Operative Southland Regional Policy Statement 2017

The objectives and policies of the following chapters are all relevant to some extent.

- Chapter 3 (Tangata whenua)
- Chapter 4 (Water)
- Chapter 7 (Coast)
- Chapter 15 (Part A - Infrastructure)

A full objective and policy assessment would run to numerous pages and is not necessary for this overview.

Particularly relevant objectives are:

- Objective TW.3 – Tangata whenua spiritual values and customary resources
- Objective WQUAL.1 – Water quality goals
- Objective WQUAL.2 – Lowland water bodies
- Objective COAST.2 – Activities in the coastal environment
- Objective COAST.3 – Coastal water quality and ecosystems
- Objective INF.1 – Southland's infrastructure

This project will achieve the above objectives as:

- The rejection of the status quo in favour of the four shortlisted options which involve treatment, then earth/rock or wetland contact prior to discharge to the wider receiving environment, is a genuine effort to sustain or improve the mauri and wairua of coastal waters. Furthermore, beyond a small mixing zone, the project ensures that mahinga kai and customary resources are healthy, abundant and accessible. The land disposal option on the shortlist would more effectively achieve this (Obj. TW.3);
- It provides for infrastructure in the coastal environment while managing adverse effects (Obj. COAST.2);
- Coastal water quality will be at least maintained by all the shortlisted options (Obj. COAST.3);
- The project provides critical infrastructure that is also regionally significant in terms of the community and economic development and jobs that it enables and supports (Obj. INF.1);

Operative Regional Coastal Plan for Southland 2013 (RCP)

The project is consistent with the RCP in that the BPO process has resulted in the rejection of options that would discharge to coastal estuaries and any sites of significance in the coastal marine area.

Particularly relevant objectives are:

- Objective 5.3.1 - Protection of amenity values
- Objective 5.3.6 - Safe environment
- Objective 5.8.1 - Efficient use and development of natural and physical resources
- Objective 7.2.2.1 - Maintenance of coastal water quality

Discharge policies in section 7.3 (Discharges) aim to:

- avoid, remedy or mitigate the adverse effects of the discharge of contaminants into the coastal marine area of Southland (Policy 7.3.2.1);
- require alternatives to discharging to the coastal marine area to be considered (Policy 7.3.2.2)
- discourage direct discharges of human sewage unless they pass through land, with a preference for disposal to land (Policy 7.3.2.9)

The latter policy is the most specifically relevant for the project so is set out in full (with emphasis added):

The discharge of human sewage from land-based sources directly into coastal water, without passing through land, may occur only where:

a it better meets the purpose of the Act than disposal onto or into land;

b there has been consultation with the tangata whenua in accordance with tikaka Maori and due weight has been given to Sections 6, 7 and 8 of the Act; and

c there has been consultation with the community generally.

A related rule (Rule 7.3.2.2) also refers to discharges to the coastal marine area that pass through soil or wetland.

In summary, this project involves comprehensive assessment of effects, careful consideration of alternatives, tangata whenua engagement, provision of effective treatment and mitigation and, notwithstanding excellent compliance record of the status quo, it proposes enhancements and investment for all shortlisted options. This project is assessed as being consistent with the RCP objectives and policies.

Partially operative Southland Regional Water and Land Plan (RWLP)

The project is consistent with the RWLP in that the BPO process has resulted in the rejection of options that would discharge to freshwater, noting that the protection of freshwater quality is one of the primary focus areas for the plan.

The RWLP is only relevant for one of the four shortlisted options, this being the land disposal option.

A full objective and policy assessment would run to numerous pages and is not necessary for this overview.

Particularly relevant region-wide objectives are:

- Objective 1 relating to sustainable and integrated management;
- Objective 2 relating to mauri of water;
- Objective 3 relating to economic, social and cultural wellbeing;
- Objective 4 relating to tangata whenua values and interests;
- Objective 6 relating to water quality;
- Objective 9B relating to the importance of enabling regionally and nationally significant infrastructure;

Particularly relevant region-wide policies are:

- Policy 13 (Management of land use activities and discharges);
- Policy 14 (Preference for discharges to land)
- Policy 17A (Community sewerage schemes and on-site wastewater systems)

This project is assessed as one that will achieve the objectives of the RWLP and is consistent with the policies that implement the objectives. Particular regard has been given to avoidance of effects on freshwater bodies, and to important tangata whenua values and interests and the restoration of mauri. This project will achieve the operation of regionally significant infrastructure, fully consistent with Objective 9B.

As the RWLP is only applicable for the land disposal option (and not the other shortlisted options where the RCP applies), the project is consistent with Policy 14, and also other applicable policies.

The project also aligns with the objectives and strategies set in the following documents.

Beyond 2025 – Southland Long Term Regional Plan

- Key enablers
- People
- Economic
- Environment

Bluff Motupohue – 2020 Tourism Master Plan and Implementation Plans.

Anything else?

Please write your answer here:

Invercargill City Council considers this is an ideal project for Schedule 2A but if it is not accepted for Schedule 2A, seeks that it be listed in Schedule 2B.

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

### Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

### Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

No non compliances or enforcement actions taken.

Load your file here:

No file uploaded

### Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

s 9(2)(a)

Important notes