



Stantec New Zealand

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14 December 2023

Enquiries: Kathryn Halder
Project No: 31003031

Nelson City Council
PO Box 645
Nelson 7040

Attention: Adrian Ramage

Dear Adrian

RE: Lodgement of Application for Resource Consents for the Nelson Wastewater Treatment Plant

The Nelson City Council (the Council) operates the Nelson Wastewater Treatment Plant (the NWWTP) located at 162 Boulder Bank Drive, Nelson. The Council holds several resource consents (all referenced as RM02169, but also subsequently changed in 2007 by RM065473). The resource consents are due to expire on 1 December 2024 and the Council has prepared an application and assessment of environmental effects (AEE) for new (replacement) resource consents for the same activities. This application and AEE, prepared in accordance with the Resource Management Act 1991 (RMA), are attached. I am the address for service for the Council for this application and I understand that that no fee/deposit is required to be paid where the Council applies for resource consents from itself.

The Council has commissioned a number of reports supporting the application which are included in the appendices of the application and AEE. You will note that Sections 8.8 and 14 of the AEE outline that the Council has commissioned three Cultural Impact Assessments (CIAs) from local iwi. These CIAs are expected to be completed and provided to the Council by the end of February 2024. I understand the Council (Warren Biggs and Lucy Clarke) met with you on 21 July 2023 to discuss the lodgement of the application without the CIAs having been completed at the time of lodgement and you confirmed that, provided all other parts of the application and AEE met the section 88 RMA completeness check, you would not consider the application 'incomplete'. It was agreed that the Council would request the processing of the application be suspended immediately following the section 88 RMA completeness check while the CIAs were being completed.

Accordingly, the Council requests, under section 91D of the RMA, the processing of the application be suspended from the date the application is deemed to be complete under section 88 of the RMA until the CIAs have been received and provided to the consent authority. However, as also discussed at the 21 July 2023 meeting, the Council requests that you initiate a review of the other parts of the application and AEE while the CIAs are being prepared. The Council will provide you with regular progress updates in terms of the delivery dates of the CIAs.

I also draw your attention to Section 10.3.5 of the AEE which outlines the additional testing the Council commenced at the NWWTP in early September 2023 in terms of human norovirus concentrations in the influent and treated wastewater. This testing is proposed to continue for a period of 12 months (ending in September 2024) and the results will inform whether an upgrade to the NWWTP will be undertaken to reduce the concentration of pathogen in the discharge. The Council considers the approach is a prudent and responsible one given that it is not certain that the risks of the current (and future) discharge from the NWWTP are unacceptable or not. Any upgrade will involve a significant investment and the Council needs to ensure such expenditure is shown to be necessary before committing it for an upgrade. The proffered conditions included in Appendix W include some (Conditions 17 to 19) which would apply if the upgrade is shown to be needed, however these are not being proffered if the testing shows an upgrade is not needed.

Design with community in mind

Please do not hesitate to contact me if you have any questions regarding the above.

Yours sincerely

Stantec New Zealand

Kathryn Halder
Principal Environmental Scientist

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Encl (NWWTP Resource Consent Application and AEE)