

Queenstown Lakes District Council

5 July 2016

Open letter to the Mayor, CEO and Councillors

Re: Design work for the Glenorchy Sewerage Scheme

Overview

Sustainable Glenorchy Inc. is concerned that Council has authorised a tender process for the Glenorchy Sewerage Scheme while there is still significant uncertainty surrounding the proposed discharge and land treatment area.

The decision to proceed with detailed design work carries a significant financial risk and was based on incorrect and incomplete advice from Council staff: Mr Glasner did not make it clear to Councillors that there will be surface disposal of effluent over part of the reserve and that public access will not be possible because of that; nor did he explain that Cabo's opposition to the proposed discharge site and alternative sites, may restrict what is possible in terms of the reticulation and discharge. Simply put, there may not be enough land available to support the discharge of the proposed Gravity Sewer.

We believe that the recommendations in the report dated June 30 2016 should have been reconsidered in light of Cabo's opposition and we request that Council now delay costly design work until resource consent and the designation have been obtained.

Explanation

The risk in proceeding with design is due to the following:

- 1. The discharge application will be publically notified with both the leaseholder and a significant number of residents opposed for a variety of reasons;
- 2. **The consent conditions are obviously unknown**, including whether QLDC will be allowed to discharge at 35mgN/L as proposed;
- 3. **The designation has not been obtained** and both the leaseholder and a significant number of residents are opposed;
- 4. QLDC have confirmed they are now considering other sites for land treatment, including other land on the Peninsular Reserve (leased by Cabo), the airstrip (to which access is controlled by Cabo) and sites within the township; and now
- 5. **Cabo has voiced its opposition to alternative sites:** At last week's Council meeting it was made very clear that at least some but perhaps all potential land treatment sites south of the township are no longer practicable options due to Cabo's "vehement" opposition.

Mr Glasner should have made Council aware of the likely consequences of Cabo's opposition: specifically, that the discharge area may now have to be located on a smaller area within the township.

He should also have explained that the size of potential land treatment areas could severely restrict the reticulation options: a Gravity Sewer requires significantly more land for the same level of treatment and cost when compared with STEP/STEG reticulation; likewise, a whole town scheme will require a significantly larger land treatment site than partial reticulation of the commercial sector.

The current proposal requires a minimum of 6ha now, plus land to expand to. If it turns out that there is insufficient land available and a Gravity Sewer is no longer practicable, then up to \$400,000 worth of detailed design will become a loss to be added to the cost of the scheme (increasing the cost per dwelling equivalent and the likelihood of a NO vote).

We are asking QLDC to eliminate that risk by delaying detailed design until a land treatment area has been secured and consent conditions are finalised.

QLDC has the time to take this approach; the science tells us that there is no public health issue requiring Glenorchy to hurry up and reticulate its wastewater.

The report Mr Glasner referred to at the Council meeting (by Sean Leslie, ORC) does indicate that Glenorchy will become a septic tank 'hotspot' *when it is fully developed*; the figures in the report are based on modelling, assuming full development and 365 day a year occupancy of all dwellings. The report acknowledges that it may overestimate current Nitrogen loading rates where full development has not yet occurred.

The report also found that, even at ultimate development, Glenorchy was not considered to be a 'high priority' area. The reason is that the contribution of septic tank effluent to the recharge rate of the aquifer is - and will remain - small in relation to the contribution from rainfall and other sources.

This finding is consistent with the absence of any evidence of pollution. Therefore, the financial risk of proceeding with detailed design ahead of obtaining consent cannot be justified on public health grounds.

We would appreciate your thoughts on the matter.

Sustainable Glenorchy

Kind regards

Executive Committee