

Allan Youlden, Submission to Hearing, July 2014

Kia ora and good morning/afternoon.

I was born in Sunderland during air raid in the Second World War. Sunderland is so named because the river Wear cut the land asunder. I came to New Zealand in 1972 and was employed at Manapouri Power Station for 25 years up to 2000. During that time I was involved in the Public Service Association for more than 20 years as local delegate, and 12 years as Chairman of the National Energy Group and on the National Policy Council of the PSA. At that time I worked very closely with the PSA Rununga to arrange an annual Hui on several Marae's as part of the PSA commitment to the Treaty and also as education of National Policy Councillors. I found it to be a great education for me.

I was actively involved in the safety of Manapouri Power Station and the wider area of the organisation. I wrote the Emergency Plan for Manapouri Power Station and upgraded and reviewed it for many years. I have just recently completed an Emergency Plan for the Manapouri community.

I am a New Zealander and have lived in Manapouri for 40 years, and feel very passionate about it. It is still a very beautiful place to live, and hopefully will be well into the future.

I have been on the Manapouri Community Development Area Committee for 12 years, 9 of which as Chairman. I'm just starting my fifth term. I was President of the Te Anau Club when we sold the hotel we owned and built the present clubrooms. I have been President of Fiordland Probus and I am now Vice President once again.

My aim in outlining these involvements is hopefully to show I am committed to the well-being of the community in which I live.

I have two speaking positions. One to a personnel submission, and one on behalf of the Manapouri Community Development Area Submission. If it so pleases you, I would like to combine my two speaking positions into one.

I would like now to turn to the proposed changes to the District Plan 2012.

We are against the Hearing for the Change in Designation in the District Plan being held concurrently with that of Discharge Consent. In our mind the hearing for the Discharge Consent pre-supposes the decision of the Change in Designation.

The very way this Proposed District Plan was handled by SDC made it apparent to a lot of people that SDC hoped to slip in the change in land re-classification through without any dissent. There was a workshop held in Te Anau, at which representation from Manapouri CDA was invited. At this workshop the main

points of interest to the area were presented along with printed material, but there was no mention of the change in land designation to allow for Wastewater Discharge under section 170 of RMA. I along with a lot of others only discovered this at a later date.

We know of no policy of SDC that allows the discharge treated human sewage onto land. If there is such a policy, then I would have thought it should have been alluded to in the Application, and have conditions as to the quality of any discharge. I have not seen any such conditions. It is not known what the containment in an enclosed pipeline for up to three days will have on the fluid, or if the treatment will be successful in controlling the odour before discharged to land.

Part of the proposed District Plan, which you will have seen, was to expand the Scenic Reserve around the Te Anau Manapouri area, but leaving a gap in the plan around the Te Anau Airport Manapouri. In the Scenic Reserve it was proposed Recourse Consent would be required for any structure over 2 meters in height to be erected on farmland in that area. That is if a farmer wanted to put up a glasshouse in his garden he would need Recourse Consent. There would also be control of what colour was used on his house or other building.

Now SDC intend under this consent, to erect two central pivot irrigators 690, 700 or 735-meter diameter, depending who's figures you take in this Application is listened to, 5 meters high, to discharge treated sewage in what is scenic land. Land which Sir Peter Jackson thought the area of such significance; he included it in Lord of The Rings films. It is also a favourite spot for tourists to stop and take photographs of the beauty, of the scenery. These irrigators will be on flat land close to the road. Surely this is in contravention of the principal of the proposed District Plan.

I turn now to the Recourse Consent 302625, in no particular order.

It bewilders me that a Consent Application not based on fact, but built around so many probable, expected and hoped for outcomes, has got to a hearing stage. An application not based on substance and fact but on claimed assumptions, hoped for results, probable little effect, expected outcomes, and probable flows. An application that also contradicts it's self in its claims. I would like to think that any decision based on the RMA is based on facts and not probabilities.

When the need to renew the Consent to upgrade the Te Anau Sewage system was first considered a Strategic Review Committee (Key Interested Stakeholders) was set up comprising representation from Te Anau Community Board, Environment Southland, Guardians of the Lakes, Iwi, Fish and Game, Department of Conservation, and MWH. At the first meeting held on 6 September 2005 it was stated "Land negotiation and geo-tech are in hand leading to concept plan", and it was decided "SDC to undertake a scoping investigation of possibilities in Area C (and extend to consider land down and around Manapouri

Airport". It appears from that the land at the Kepler Block was preferred before any other was considered. It was this group that made the decision to use the Kepler Block for to pump Treated Sewage from Te Anau and not the public.

Once it was decided in 2006 that Manapouri Airport was the most probable site for treated sewage to be discharged, and that it was proposed to include Manapouri Treated Sewage in 2024, one could reasonably expect the Manapouri CDA to be included as a Key Interested Stakeholder at the meetings. This was not the case. The only time Manapouri CDA have been invited to and meeting was a workshop in 2012. Manapouri CDA has never said it has any interest in having treated sewage pumped to the Kepler Block. Their favoured option at the moment is to discharge to land closer to Manapouri. Of the 78 submissions received from Manapouri all bar one were against this application. A petition was circulated around Manapouri requesting SDC not to proceed with their plans to pump treated sewage to the Airport at Manapouri. This gained 231 signatures from a population of 228 residents plus cribbies.

The original concept back in 2006 was for to discharge treated sewage from a population of 40,000 people. There being no suitable land big enough closer to Te Anau, the Kepler Block was chosen. The greatly exaggerated projected growth of Te Anau was slashed due the 2013 Censors. At that stage the whole project should have been reviewed and an extension to the present discharge permit requested, to allow a re-think and consider the alternatives. It wasn't and we now have a down size of the original scheme, proposed in stages. Stage one discharge area has been limited to the northern side of the Airport at less that half of the original are. This now being the case, there is very possibly suitable land of an adequate size, closer to Te Anau. So reducing the need for such a long pipeline.

The original plan was for to discharge to the south side of the Kepler block. Both areas are prone to surface flooding during high rainfall, as has been seen in the past, Especially November 1982 and January 1983, when we had two fifty year floods in two months. The rainfall for October 1982 was 164.1mm, November 1982 - 224.5mm, December 1982 - 66.7mm, and January 1983 – 251.7mm. For part of that time the road between Te Anau and Manapouri was also washed out. The January 1983 rainfall contradicts the findings quoted in the application and statement of evidence that states summer months are dryer.

We are told that extreme weather patterns are only going to become more prevalent into the future. So we can expect more flooding of the area, and if there is a discharge under those conditions, who knows where the runoff will end up. There is not a lot of holding capacity at the Te Anau Settling Pond.

The latest Census figures show a decline in Manapouri population of 25.4%. The threat of sewage discharge on the Kepler Block must be a contributing factor in this decline in population. There are over 30 houses for sale in Manapouri but non-are selling. Real estate agents are reported to be advising their clients not to buy in Manapouri due to the proposed treated sewage discharge at the Airport making it a bad place in which to invest This will only get worse if the Consent is granted.

It is admitted by the Applicant that there could be odour drift beyond the area. Odour drifting beyond the boundary indicates that Pathogens will also, and even drift further. This is of major concern and one, which should be investigated by the Department of Health.

I believe the Operational, Management, and Environmental Plans and Policies should form an integral part of any Consent Application and be included in it, as they will form the conditions by which the consent operates and is monitored. They will be written without public input or knowledge of what is included, or excluded, or the reasons why.

The proposal is for two central pivot irrigators of considerable length, but also alludes to future irrigation of a further 50ha in the future, if and when needed. These irrigator spraying upwards from set points, having a greater spray and pathogen drift. Surely there should be more information as part of this Consent, or is there to an additional Consent for that stage?

The Surface Water Discharge Pathways are not proven, only assumed for the benefit of this Application.” In the Application documentation it states, “The extent of the discharge zone cannot be accurately determined with the available information.” Is this due to lack of investigation, or they did not like the results that they were getting? So progressed no further with their investigations. It could flow in an altogether different direction, and into Home Creek, Lake Manapouri, or even into the Airport water bore.

There is no way of knowing how long the existing ground water flows will remain as they are at present, as the land levels in the Manapouri area are changing with each earthquake. This is an earthquake prone area and the shape of the land in 35 years time could be considerably different to what it is now. If it is essential to discharge to land, and I am not sure that it is, there are other alterative options, and at locations which will have less impact on populated areas than the option and location of this Consent Application.

There is no evidence put forward of any research or baseline data compiled of the Ecology of the soil or peat bog that is to be sprayed. I asked for this at the two information days at the Airport and was told they would get back to me. As

yet they have not. Without any baseline how can the effects on the environment of this discharge be monitored, and said with any accuracy, that it has “Little or No Effect” on the present environment? Any proposed monitoring of the environmental effects can only be baseless and serve little or no purpose. There is also no evidence of the effect of the cocktail of pharmaceuticals, enzymes, and other pathogens on the invertebrates, and any downstream effects on the environment. There is evidence, but not in the Application, and only from a small source of several pharmaceuticals being found in the milk of the cattle that are fed crops grown under similar conditions.

If this Consent Application were granted we strongly disagree with the 35 years term. The advances being made in sewage treatment could markedly improve during that time, making this system obsolete, and the beautiful area in which we live could be ruined for future use.

There should also be a condition applied to the Consent to imposed to rehabilitation of the land after any discharge of effluent, and extend the environmental monitoring long after the consent expires. The land should be tagged as a polluted area until proven otherwise.

There is an admission of a “low risk of odour beyond the irrigation area” but no solid plan of how to deal with it. That is until we get the Statements of Evidence after submissions have closed. Kevyn Lockyer states there is now to be Trickle Filter soil bio-filter at the southern end of the pipeline as part of an odour control system that also incorporates a covered 13-metre tank. This is the first time there has been mention of such a system and one I consider being new to this Consent Application. There is no information as to how long this filter will be out of commission for maintenance, or how often.

A trickle filter system was put to a workshop of Te Anau Community Board on 18th October 2006 but was not accepted as an option.

At a workshop in 2012 of Te Anau Board, at which 2 Manapouri CDA committee were invited, (I being one of them) a representative of Bio-filtro made a presentation of that system, but his proposal was rejected without much real consideration.

If a Trickle Filter is to be incorporated into the Te Anau Sewage Treatment System it should be to the treatment site and be of the Bio-filtro type or similar. That would negate the need for a 19km pipeline as the outflow would be able to be discharged into the Upukerora River.

There is contradicting evidence even in the disclosures as to how long treated sewage could be held if not discharged to the Kepler Block. Where would the

treated sewage be dumped from the treatment station when unable to discharge onto the proposed land? Presumably into the Upukerora River.

The roadway between Te Anau and Manapouri along which the pipeline will travel has been washed away on more than one occasion. When this happens again it will most probably rupture the pipeline. Discharging its contaminants where it ruptures. Having no road will prevent people from Te Anau getting to the Manapouri side to close any valves, allowing the full contents to spill. A 250m/m pipeline will hold 9.700 litres of fluid. A 300m/m pipe considerably more.

Simon Herbert Beal made mention in his Statement of Evidence of the use of bird scaring devices such as percussion noise scares. This too is newly introduced information into this Consent Application, of which there is no noise component. Are we now to believe that apart from the drift of Pathogens and odour we are going to be annoyed by the constant noise from percussion bird scares?

Another new introduction is having isolation valves approximately every kilometre, air emission valves at the high points, and drain valves at intervals, to drain where? It doesn't say. All these extras; Bird Scares, Trickle Filters, Valves will increase the cost considerably, beyond that told to the public and acceptable by them.

Roger Oakley states; Up until 2012 the scheme being looked at was for population growth of 20,000 in 20 years and 40,000 in 50 years. There is no evidence of these figures being based on any survey or formal analyse. It was decided the area of land needed for treated sewage disposal to land for a population of 40,000 people was not available closer to Te Anau, we are told. Any future predictions of growth could be considerably out of line with reality, especially with a 35-year term.

We believe there are alternate systems that could be used and were not fully considered. Bio-filtro, Bio-Domes, and a Southland's own ET-System, which is yet to get a Patent, but has carried out tests on raw sewage from the Te Anau ponds. These are systems that are known of by SDC, but were not fully investigated. Outlet from these systems could be discharged onto land to run off into the Upukerora River. These options would alleviate the need for a 19km pipeline and to spread pollutants onto land, especially land in this pristine area close to a struggling tourist airport in this beautiful area in which I live.

Lake Te Anau is classed as Natural State Waters, which in fact it is not. There are rivers running into the lake, which contain pollution, therefore polluting the Lake itself, all be it minutely. The Upukerora is polluted far more by other users than the outlet from the Te Anau sewage outlet. Not that that the outlet from the Te Anau sewage plant is good and it could well be improved.

This consent application is for a maximum discharge of 4,500m³/day, which equates to 19.2m³/s. The normal minimum flow from Te Anau is 113m³/s, the

outflow from the discharge is only 1.7 of that flow. Taking the worst possible figures. If the sewage discharge were 100% pollution it would only be 11.5ppm of the lake outflow when lake outflow is at a minimum. The average outflow would be closer to 400m³/s and that would give a pollution rate of 1.3ppm. Which is difficult to detect. And those figures are based on a 100% pollution rate of discharge 4,500m³/day from sewage plant. If treated sewage water were discharged after going through a modern treatment plant then it would be well within the limits set by Environment Southland for discharge into the Upukerora and would be undetectable once in Lake Te Anau.

Currently Environment Southland is spraying 155km and 750ha of river catchments with herbicide each year. The Upukerora is one of those rivers. This is taken from Environment Southland Concept Plan, Managing Unwanted Vegetation in Southland Rivers. Surely the spray of herbicide is a far greater contamination than the discharge from a modern sewage treatment plant.

Nick Smith used being cost effective as a factor in his ruling on the Monorail RMA. Last year the Local Bodies Act was changed removing the four well beings as criteria for expenditure and replaced them with cost effective. This has set a precedent, which can now be used in RMA cases. Those being the case do the commissioners intend to take the cost effectiveness of this project into consideration when making their decision?

We think this application should be declined for the following reasons.

The lack of:-

1. detail and substance outlined in the Application,
2. Management Environmental and Operation Policies and Plans,
3. detail of how, what and by whom environmental testing is to be done,
4. process of advising the public of true findings of any testing,
5. details on procedures and how odour will be controlled,
6. baseline soil and peat bog ecology data, contained in the application, and disclosure of all monitoring
7. any programme for Airport and other bore water testing,
8. future ability to promote the Airport.
9. also the effect on the lives and well-being of local residents and the value of their property.
10. the cost effectiveness of the system as against other options.

We ask that this consent be declined, and that SDC seek a further extension to the existing consent to allow other all-alternative options to be fully investigated and costed, with greater transparency.

I thank you for allowing me the opportunity to speak to our submission.

I will try to answer any questions you may have, or clarifications you may require.