



# Bluff Wastewater Consenting Project

Council Workshop 19 September  
2024



# Project Vision and Objectives

- The **vision** of the Project is to meet the Bluff community's current and future wastewater servicing needs by working with iwi and stakeholders to determine the Best Practicable Option (BPO) and seek resource consent for that option.
- The **objectives**: To achieve this, the project will work in partnership with Te Ao Marama Inc. and engage with the community to identify the BPO to continue to provide wastewater services for the Bluff community. The BPO will:
  1. Provide a safe and reliable wastewater discharge for the Bluff community.
  2. Provide a discharge solution that is achievable, affordable and deliverable.
  3. Reflect a partnership process 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.



# Best Practicable Option (BPO)

- The definition of the BPO under the Resource Management Act 1991 (RMA), Section 2(1) is:
  - “best practicable option, in relation to a discharge of a contaminant or an emission of noise, means the best method for preventing or minimising the adverse effects on the environment having regard, among other things, to:
    - a) the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and
    - b) the financial implications, and the effects on the environment, of that option when compared with other options; and
    - c) the current state of technical knowledge and the likelihood that the option can be successfully applied”



# Technical Reports

- Affordability Assessment Report
- Suitability for Land Discharge Report
- Natural Hazards Report
- RIB Potential Site Ecological Assessment Report
- Assessment of Wetlands and Potential Nutrient Impact from Seepage Report
- Flows & Load Report
- Environmental Summary Report
- Qualitative Public Health Risk Assessment



# Evaluation Results – Affordability Assessment

Component of Assessment	Option 1F - Surface Flow Wetland	Option 1G - Land Contact Non-wetland	Option 3B1 - RIB within 2km Partial to Outfall	Option 3B2 - RIB within 6km Partial to Outfall	Option 3C1 - 100% RIB within 2km	Option 3C2 - 100% RIB within 6km
Capital cost	\$6,740,000	\$3,730,000	\$18,710,000	\$33,550,000	\$18,070,000	\$34,350,000
Operating and Maintenance Cost	\$120,000	\$20,000	\$350,000	\$470,000	\$350,000	\$470,000
Whole of Life Costs	\$13,867,000	\$6,965,000	\$33,955,000	\$62,334,000	\$33,826,000	\$63,824,000
Additional Cost Per Rating Unit (ICC)	\$23	\$10	\$90	\$153	\$88	\$156
Value for Money (VfM) Indicator - Rate if Funded by Bluff Only	\$378	\$158	\$1,330	\$2,253	\$1,293	\$2,301
Is it Affordable for ICC?	<b>Yes</b>	<b>Yes</b>	<b>Yes</b> - contingent upon significant compromises on other projects	<b>No</b>	<b>Yes</b> - contingent upon significant compromises on other projects	<b>No</b>



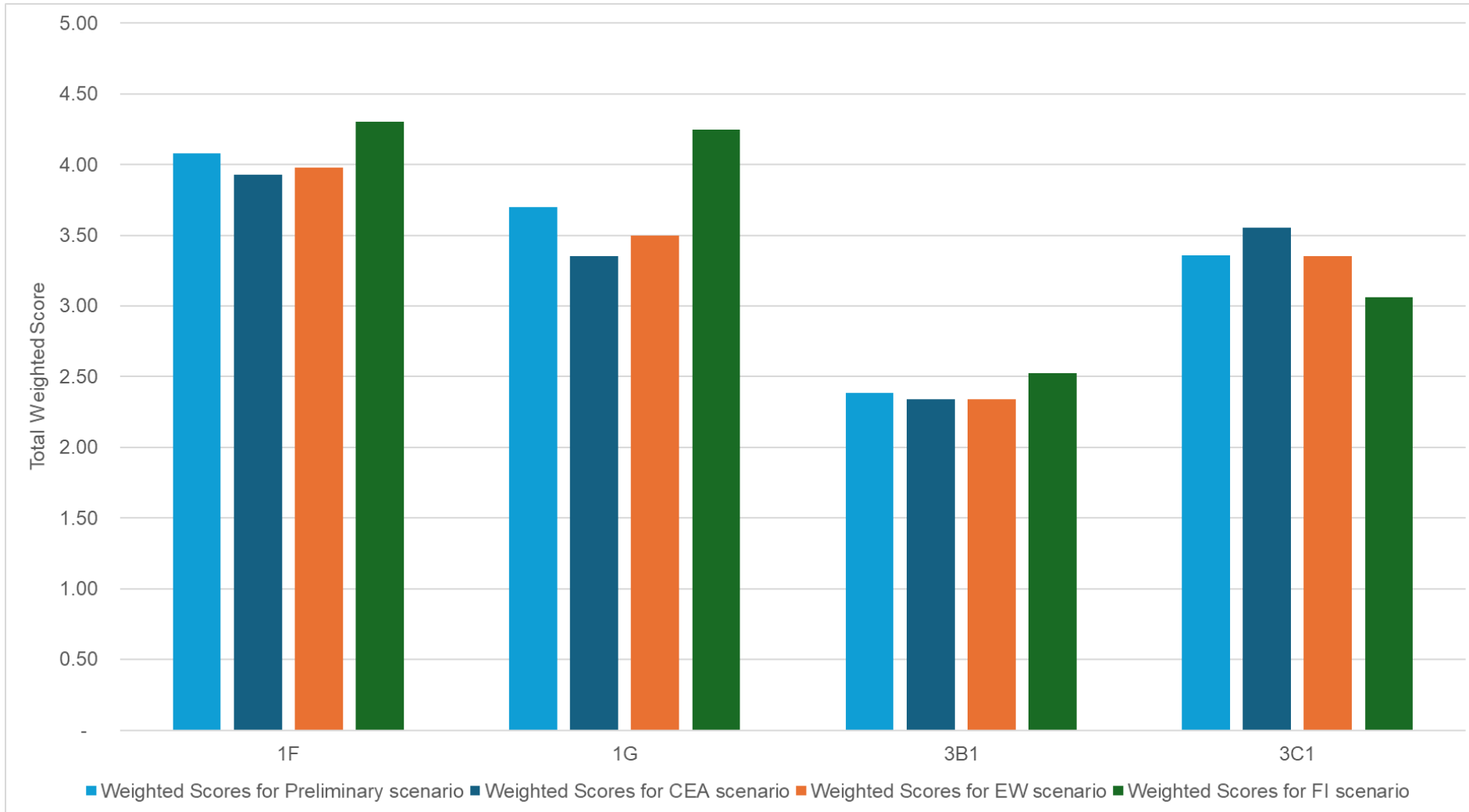
# Evaluation Results – Specialist Scoring

RMA BPO Definition	Description	Scores from Specialists			
		1F	1G	3B1	3C1
(a) Receiving environment sensitivity	What is the nature of the discharge, and how sensitive is the receiving environment to adverse effects?	5	4	3	3
(b) Comparative effects assessment – social and public health	How do the effects of each of option compare with the other options in terms of the social and public health impacts?	2	2	3	4
(b) Comparative effects assessment – cultural	How do the effects of each of option compare with the other options in terms of the cultural effects?	3.5	1	1	5
(b) Comparative effects assessment – biophysical	How do the effects of each of option compare with the other options in terms of the biophysical effects?	5	5	3	3
(b) Comparative financial implications	How does the cost to ratepayers of each option compare with the other options?	4.6	5.0	2.7	2.8
(c) Likelihood that option can be successfully applied and is a proven solution	Can the options be successfully implemented e.g. how complex is each option to construct, operate and successfully be applies when compared with the other options and are the technologies reliable / proven??	4.5	5	1	1



# Evaluation Results – MCA/BPO Weighted Scores

## Total Weighted Score for MCA/BPO for Different Weighting Scenarios





# Working Group – BPO Preferred Scheme Recommendation

The working group recommends that Invercargill City Council adopt Option 1F (status quo treatment plus new naturalistic wetland) as the Best Practicable Option (BPO) for the purpose of seeking replacement resource consents for the Bluff wastewater discharge.

**Option 1F** emerged as the **BPO preferred option** for the following reasons (which are in no particular order):

1. *Affordable* - Subject to further cost estimate refinement, it is expected that this can be achieved within the recommendations provided in the affordability assessment report.
2. *Discharge of treated wastewater to land not practicable in these specific circumstances for Bluff* - Alternative land discharge options were thoroughly considered, including through to the final shortlist stage, but were ultimately rejected for affordability, environmental and engineering feasibility reasons that were specific to the few potential sites in proximity to the WWTP.
3. *Better cultural outcome than status quo* - It provides for a form of post-treatment land contact prior to discharge to the marine environment which is a better outcome from a cultural perspective than the status quo.





4. *Biodiversity benefits* - Development of the wetland area will also provide an element of environmental / biodiversity enhancement.
5. *More consistent with relevant planning provisions than status quo* – The enhancement/land contact provided by Option 1F is more consistent than the status quo with the relevant policies in the New Zealand Coastal Policy Statement, Southland Regional Policy Statement and Southland Regional Coastal Plan.
6. *Anticipated consenting process benefits* - the working group anticipates a considerably more straightforward process (in terms of duration, costs and complexity) associated with the consenting of Option 1F compared with status quo and other enhanced status quo options.
7. *Practical option* - Subject to further site investigation, concept design and cost estimate refinement, the working group is confident that a practical engineering solution and practical consent conditions can be achieved.

### **Next steps**

The working group recommends further site investigation, concept design and cost estimate refinement of Option 1F and, subject to satisfactory outcome of this further work, that Council adopt Option 1F as the Best Practicable Option to take forward in resource consent applications.



# Working Group Consideration of Status Quo

The working group considered the status quo (Option 1A) through the options evaluation process but this did not make the final shortlist because it considered that Option 1A would:

1. be inconsistent with national policy direction in the New Zealand Coastal Policy Statement (specifically Policy 23(2)(b))
2. be inconsistent with regional policy direction, specifically Policy [7.3.2.9](#) of the Regional Coastal Plan which supports post-treatment land contact prior to any marine discharges of this nature;
3. likely lead to a highly uncertain consenting outcome, with associated costs
4. not reflect the outcomes of a partnership approach that meets the commitments in the Charter of Understanding *He Huarahi mo Nga Uri Whakatipu*.

Pre assessment draft

Component of Affordability Assessment	Option 1A - Status Quo
Capital cost	\$2,080,000
Operating and Maintenance Cost	\$-
Whole of Life Costs	\$4,106,000
Additional Cost Per Rating Unit (ICC)	\$9
Value for Money (VfM) Indicator - Rate if Funded by Bluff Only	\$143
Is it Affordable for ICC?	<b>Yes</b>



# Consent Application - Next Steps

Following Council adoption of the BPO, the next steps will be:

## *Application preparation*

- Progress concept design for proposed post-treatment wetland
- Complete engagement and consultation
- Prepare resource consent applications for coastal permits (discharge and outfall structure)
- Prepare Assessment of Environmental Effects (building upon technical reports already done)
- Prepare draft set of proposed conditions of consent
- Seek Cultural Values Assessment
- Pre-application meeting with Environment Southland

## *After lodgement*

- ES will make decision on notification vs non-notification (preferred)



# Briefing – Resource Management Act and the Fast Track Approval Bill

- Traditional resource consent application
- Fast track consent application
  - Once Bill passed
  - If Bill amended to preserve roll-over rights
  - If application can be processed in time before existing consent expires



# Fast Track Process

- Faster than traditional RMA processes
- Fewer participants
- Limited appeals
- Different purpose and lower prioritisation of RMA planning documents
- Mandatory to consult with iwi authorities
- Ministers must obtain and consider a Treaty settlements and other obligations report
- Iwi authorities invited to comment