
REPORT 2
(1215/52/IM)

DRAFT LIQUID WASTE MANAGEMENT PLAN: REPORT BACK ON CONSULTATION

1. Purpose of Report

The purpose of this report is to detail the results of the consultation process on the draft Liquid Waste Management Plan and recommend changes to the draft Plan as a result of that process.

2. Recommendations

It is recommended that the Committee:

1. *Receive the information.*
2. *Recommend to Council that it:*
 - a. *Note that 13 written submissions on the draft Liquid Waste Management Plan were received and three oral submissions made during the special consultative procedure (which was held in conjunction with the draft Annual Plan 2005/06).*
 - b. *Note that a summary of the issues raised by the submissions along with the recommended response is attached at Appendix 1.*
 - c. *Agree that the issues raised by the submitters, attached at Appendix 1, on the proposed Liquid Waste Management Plan have been considered.*
 - d. *Agree that the special consultative procedure has been completed pursuant to sections 83 and 87 of the Local Government Act 2002.*
 - e. *Agree to adopt the Liquid Waste Management Plan, attached as Appendix 2, to the Officer's report.*

3. Background

The draft Liquid Waste Management Plan (LWMP) was produced under the requirements of the Local Government Act 2002 and the New Zealand Waste Strategy 2002. The Plan will also sit within the context of the Environmental Strategy currently being developed.

The draft Plan sets out a long term direction towards meeting a number of future challenges relating to sewerage and stormwater management. Under the Local Government Act 2002, the final Plan is required to be adopted by Council by 30 June 2005.

Public consultation on the draft LWMP was held during 20 April – 20 May 2005 in conjunction with Council's draft Annual Plan 2005/2006.

As part of the consultation process, copies of the draft LWMP were placed in all Council libraries, the Service Centre and on Council's website. Information about the draft Plan was published in The Wellingtonian, the Absolutely Positively Wellington newspaper sent to all city residents and public notices were placed in The Dominion Post. A meeting was held with Ngati Toa and the Wellington Tenth Trust. A presentation was also made to the Makara Ohariu Community Board. In addition, some of the consultation material for the draft Annual Plan included information about the draft LWMP.

Copies summarising the draft LWMP were sent out to 157 organisations. They were invited to submit on the draft Plan and details were provided on how further information about the LWMP could be obtained. A public meeting was also held to discuss both the LWMP and the draft Assessment of Water and Sanitary Services which five members of the public attended.

4. Discussion

4.1 Consultation results

As part of the draft Annual Plan submission process, 13 written submissions were received and 3 oral submissions were made about the draft LWMP. Those who made written submissions are listed below (with the relevant submission number in brackets). Those who also made an oral submission about the draft LWMP are indicated *.

- Alison Handley (462)
- Ann Louise Mitcalfe and Alex Mitcalfe Wilson (784)
- Betty Weeber* (569)
- Chris Renwick (533)
- Glenside Streamcare Group (827)
- Local Government Forum (409)
- Makara Ohariu Community Board* (517)
- Newtown Residents Association (451)
- Rosamund Averton (359)
- Trellisick Park/Ngaio Gorge Working Group*(699)
- Vijay Naidu (480)
- Wellington Conservation Board (L7)
- Wellington Tenth Trust (541).

4.2 Responses to submissions and recommended changes to Draft LWMP

A summary of the submissions made and the recommended responses are contained in Part A of Appendix 1. As the consultation on the draft LWMP was held concurrently with the draft Assessment of Water and Sanitary Services, some submitters commented on both and these are summarised in Part B.

Overall, there was general support for the direction being taken in the draft LWMP and its content. Changes to the draft LWMP have mostly been clarifications and refinements. The common issues raised in the submissions were:

- Further consultation is required with the community – this will be considered in future projects to be carried out.
- The pollution of waterways, especially with silt and sediment requires action – this is already prioritised in the draft LWMP but is dependent on further investigations being carried out first. Also the review of the Earthworks Bylaw may cover some of the concerns.
- Education is seen as a high priority – currently education programmes are carried out by the Greater Wellington Regional Council (including the ‘Be The Difference’ campaign). There are currently no plans for this Council to duplicate or enhance those programmes, however this can be explored as individual projects develop.
- The review of the Code of Practice for Land Development is considered to be one of the more important outstanding tasks and the priority for this review should be raised – this is currently scheduled to occur by 2007 and given the resources required, and other priorities, is unlikely to be achieved earlier.

The revised LWMP, including the recommended changes, is contained in Appendix 2.

4.2 Consultation with Iwi

Consultation was undertaken with Ngati Toa and the Wellington Tenth Trust.

The Tenth Trust did not specifically submit on the LWMP but noted they strongly support waste minimisation strategies, do not believe that enough is done in this area, and stress that Council needs to continue to strongly support sewerage works to eliminate pollution and reduce wastewater.

Ngati Toa representatives did not have any major concerns with the draft LWMP and noted that both they and Council appeared to have common objectives. They did not formally submit on the draft LWMP.

4.3 Implementation issues

The actions and tasks set out in the LWMP will be included in the relevant Asset Management Plans, Business Plans and/or forward programme, as appropriate, for implementation.

The Plan will be reviewed in 2008 to gauge progress and determine future actions.

5. Conclusion

This report presents the results of the consultation process on the draft Liquid Waste Management Plan.

It is recommended that the Committee agree to the final Plan, and recommend that it be adopted by Council.

Contact Officers:

Maria Archer, Infrastructure

Tina Chong, Policy

Supporting Information

1) Fit with Strategic Objectives/Strategic Outcomes

Wellington City Council already has a commitment to waste reduction and sustainability as set out in *Strategic Direction 2001*.

Outcome:

6.3 Reducing Waste

Reducing quantities of waste entering the waste stream where an increasing volume is reused, recycled or recovered.

6.4 Sustainable Disposal

All waste is disposed of in an environmentally sustainable manner ensuring the protection of people and ecosystems

2) LTCCP/Annual Plan reference and long term financial impact

N/A.

3) Treaty of Waitangi considerations

Liquid waste is an area of high interest, in particular in relation to receiving waters, wastewater treatment options and bio solids.

4) Decision-Making

This is not a significant decision.

5) Consultation

a) General Consultation

This report presents the results of the consultation process.

b) Consultation with Maori

Mana whenua have been consulted with.

6) Legal Implications

None.

7) Consistency with existing policy

The Liquid Waste Management Plan, if agreed to, will be new policy. It will also be considered in the Environmental Strategy currently under development.

**APPENDIX 1
SUBMISSIONS AND RECOMMENDED RESPONSES**

Part A - Draft Liquid Waste Management Plan (LWMP)

Submitter	Recommended response
<i>Alison Handley</i>	
1.4 Principles Supports principles.	Noted.
Part 3 – Stormwater Would like to see more forceful approach to stormwater management e.g. education, enforcement action against those who discharge pollutants into drains.	Currently these functions are carried out by GWRC. Until the Regional Freshwater Plan is amended, this Council is unable to enforce more stringent requirements.

Submitter	Recommended response
<i>Ann Louise Mitcalfe and Alex Mitcalfe Wilson</i>	
Consider Zero Liquid Waste to be a realistic expectation.	Noted.
Request all Strategic Actions to be brought forward and progressed quicker. Fees to be recovered on a polluter pays basis. Request that deadlines for increased compliance be tightened.	The actions must take into account existing work priorities and programmes and cannot be brought forward. At this stage polluter pays is only applied to trade waste disposers. Noted.
Renew the Living Earth Contract until a better use is found.	Options for future biosolids use are being considered (refer 2.3 of LWMP) and a decision will be made prior to the contract expiry in 2008.
Levels of Service for flooding are too low.	Noted.
Implementing ways to improve waterways etc to have a higher priority Council wide.	Noted, however actions must be balanced against a number of priorities.

Submitter	Recommended response
<i>Glenside Streamcare Group</i>	
1.2.3 Future Challenges Include Porirua Stream as a challenge for desirable stormwater quality standard.	The Draft LWMP includes proposed stream management for all streams. A baseline assessment of environmental effects has been completed for Porirua Stream. Earthworks Bylaw is currently being reviewed and will address some of the concerns. Code of Practice for Land Development is also scheduled to be reviewed.
1.3 Objectives Agree with objectives.	Noted.
Lack of consultation at grass roots level. Seek more opportunities for community views.	Targeted consultation has been carried out (refer committee report). Further opportunities for community participation will be carried out as appropriate.
Lists other Council documents that would like to see progressed.	Revising the Code of Practice for Land Development (2007) and review of WCC Earthworks Bylaw (2005) have already been identified. The upcoming Environmental Strategy will start to address many of the concerns. Others will progress according to own timetable and/or as required.
1.4 Guiding principles (3) Integrated Solutions – agree, but would like framework for developing/hearing community views included. (5) Partnerships – WCC and community groups should together determine type of partnerships desired.	Council has an organisational framework for developing/hearing community views. Some partnerships are developed at an organisational level and others will be considered as part of the Environmental Strategy.
1.5 Linkage to other WCC Strategies/Policies Include Northern Growth Management Framework and DP Change 32 and 33. Include NGMF as related to KAA 6.4 Sustainable Disposal.	The list included in the LWMP was not intended to be a complete list of linked documents.
2.2 Trade Waste Mitigate future impact of trade waste from Northern Growth area.	Council has other mechanisms in place to deal with trade waste and the Trade Waste Bylaw has recently been reviewed. Appreciable quantities

	of trade waste are not expected from the Northern Growth area.
3.1 Flooding Link with traffic engineers to reduce hard surface use where possible.	This will be addressed in the Code of Practice for Land Development review. The LWMP already states that when the Ministry of Transport recommendations are available, these will also be considered and implemented as appropriate.
3.2 Water Quality: General Recognise impact of future development on Porirua catchment. Include required actions to (1) build relationships between WCC and PCC to improve water quality performance (2) better manage consent process between WCC and GWRC.	The WCC Watercourses Bylaw is currently under review. The review will consider ways to improve communications and clarify responsibilities between WCC and GWRC. However, the GWRC Freshwater Plan does not provide a high degree of protection of waterways. Consent management comments are noted.
3.3 Water Quality: Sewage overflows Agree with required actions.	Noted.
3.4 Water Quality: Pollution from roads and paved areas Remove “ability and willingness to pay” from required actions.	The “ability and willingness to pay” is a RMA requirement and is overarching. Therefore the text will be removed.
3.4 Water Quality: Pollution from roads and paved areas Strengthen required actions by requiring WCC to implement solutions.	Implementation and timing of solutions will be dependent on Council wide priorities and any consultation undertaken.
3.4 Water Quality: Pollution from roads and paved areas Publicise solutions to raise public awareness.	Noted.
3.4 Water Quality: Pollution from roads and paved areas Incorporate solutions into design standards used by traffic engineers.	Will be covered in the review of the Code of Practice for Land Development.
3.5 Water Quality: Sediment and Silt Agree with required actions. Include new action of an independent review to review current performance of those issuing consents, and of regulatory services for compliance and monitoring of earthworks.	Current performance and issues of compliance and monitoring will be considered as part of the review of Council’s Earthworks bylaw. Independent review not considered necessary.

Submitter	Recommended response
<i>Rosamund Averton</i>	
Supports Liquid Waste Management Plan.	Noted.

Submitter	Recommended response
<i>Vijay Naidu</i>	
Need to conserve water and keep our marine environment free of pollution.	Noted.

Submitter	Recommended response
<i>Warwick Taylor, Newtown Residents' Association</i>	
1.4 Principles: Polluter Pays Objects to "polluter pays" being a generic statement as it could then be applied to domestic waste that could not be reduced. Also object to water metering (as this could be used to measure sewerage)	Will apply to trade waste only. Note the principle reflects the NZ Waste Strategy for everyone to take responsibility for the waste generated.

Submitter	Recommended response
<i>Wellington Conservation Board</i>	
Disappointed in the quality of this plan in terms of content and structure.	Noted.
1.3 Objectives Makes references to objectives in LGA and NZ Waste strategy without making these clear of how they are reflected in the plan. Supports the secondary objective (To ensure that we manage liquid waste in an environmentally, economically, socially and culturally sustainable manner). However the plan does not explain how objective is to be achieved.	The objectives of the LGA and NZWS are reflected throughout the LWMP including its Principles, Objectives and Strategic Actions. The Strategic Actions for both sewage and stormwater in the LWMP are the means by which the objectives are to be achieved.
1.6 Guiding Principles.	Noted. The section on Guiding Principles has been amended slightly to

<p>The Guiding Principles are difficult to use. Redrafted guiding principles are provided. Suggests an additional principle be added to include Community Outcomes.</p>	<p>remove overlaps and for clarity. It is not considered necessary to include this in the LWMP in addition to the Partnerships principle already included.</p>
<p>2.1 Sewage Treatment The “current situation” assessment for sewerage treatment is inadequate.</p>	<p>Noted. Text will be expanded.</p>
<p>2.1 Sewage Treatment Asks that adopting the target “reducing waste volumes” or the less stringent target of “reduction of sewerage per capita” be considered.</p>	<p>Sewerage has 2 parts: “flow” – is proportional to rainfall and the second Strategic Action includes “... an investigation into options to decrease the current inflow and infiltration” “load” - is proportional to the population, industry etc. Reducing this waste would necessitate a decrease in population/growth or a substantial investment in alternative waste disposal methods. At this stage the focus in on reducing volumes of trade waste.</p>
<p>3 Stormwater Explain “new design” in reference to severity of flood that new design protects against. Suggested the plan includes relevant extractions from the Stormwater Asset Management Plans.</p>	<p>Refers to the design of infrastructure. Text will be clarified. It is not considered necessary to include details of the AMP in a high-level document. The AMP will be available on the internet.</p>

Part B - Submissions relevant to both Draft Assessment of Water and Sanitary Services (AWSS) and Draft Liquid Waste Management Plan (LWMP)

Submitter	Recommended response
<i>Betty Weeber</i>	
Water management and ownership to be kept in public hands.	The LGA governs ownership of infrastructure related to water and its management
Supports stormwater storage and reuse.	Noted.
Council must continue to upgrade and keep pipes up to standard.	Noted. Refer to the relevant AMP for details.
Moa point treatment plant needs to be augmented to take all sewage flow to prevent raw sewage discharges to the sea.	Council are currently investigating mitigation options for sewage overflows at Moa Point and across its network as part of the SPE project. Also the GWRC requires an annual report on progress with this issue under existing short-term resource consents at Moa Point.
Take stormwater drains off major beaches.	Priority has been given to removing pollutants from stormwater discharges. When existing stormwater drains are replaced or upgraded, relocation is considered at the design feasibility phase.
Flood protection is a priority.	Noted. Refer to section 3.1 of the LWMP.
Improve drinking water quality in non reticulated areas by making “first flush diverters” compulsory.	A recommendation to look into the feasibility and costs of these diverters is already contained in the draft Assessment of Water and Sanitary Services.
Need an education programme for environmental and water conservation.	The Greater Wellington Regional Council carries out a number of education programmes including the “Be The Difference” campaign.

Submitter	Recommended response
<i>Chris Renwick</i>	
Proper tikanga and protocols need to be followed in areas such as liquid waste management.	Council consults regularly with iwi regarding liquid waste matters. No Change proposed to LWMP.

Submitter	Recommended response
<i>Local Government Forum</i>	
Supports regular assessments of infrastructure to ensure Council provides ratepayers with the required level of service.	This is addressed by the relevant Asset Management Plans.
Requests more detail in DAP on Council performance in providing infrastructure.	This information is contained in the relevant AMP.

Submitter	Recommended response
<i>Makara Ohariu Community Board</i>	
The Board wish to be actively included in any processes that involve regulation of non reticulated water supplies and wastewater and any discussions regarding codes of practice.	Noted.
WCC should apply to the Drinking Water Assistance Fund for funds to monitor and maintain systems.	This will be investigated and application made if relevant.
More education recommended for rural residents about safe drinking water.	Education material regarding the collection of drinking water and septic tank maintenance are available and are being distributed.
Wish to see WCC and MOH working together to avoid a two tier level of regulation	A clear definition of roles and responsibilities will be included in the Assessment of Water and Sanitary Services.

Submitter	Recommended response
<i>Trelissick Park/Ngaio Gorge Working Group</i>	
Preparation of Kaiwharawhara Catchment Management Plan be given highest priority.	An ecological assessment showed the stream retaining a relatively healthy habitat despite its location in an urban environment. The priority for the preparation of Catchment Management Plans has been determined based on a range of factors. The resulting assessment did not place this catchment near the top.
Hard Surfaces: Concern about increase of hard surfaces and their effect.	This will be addressed in the Code of Practice for Land Development review.
Stormwater discharge outlets in Trelissick Park are causing concern.	The outlets are currently being investigated.

<p>The Sewage Pollution Elimination investigations to ensure there are no sewage overflows into the stream are to continue.</p>	<p>This will be an ongoing exercise due to RMA requirements even when the project officially ends.</p>
<p>Sediment and Silt: The debris trap should be relocated off the park</p>	<p>The debris trap is in the most effective position to collect silt and sediment. Removing it will cause the stormwater tunnel to block and downstream flooding.</p>
<p>Pollution from road and paved areas: More public education is required.</p>	<p>The GWRC “Be the Difference” public education programme is already underway and additional education is not currently a priority.</p>
<p>Code of Practice for Land Development requires review</p>	<p>The review of the Code of Practice for Land Development is due for completion by 2007. (Submission referred to “Code of Practice for Urban Development” but that document does not actually exist.)</p>
<p>District Plan Rules: Changes required e.g. provide for esplanade strips to be wider.</p>	<p>Noted. Will be taken into consideration when the catchment based stormwater Resource Consents are being prepared.</p>
<p>Sewer Renewals: When sewer pipes are renewed, consider relocation outside the park.</p>	<p>The majority of the pipes were renewed recently so this cannot be considered in the short term.</p>

APPENDIX 2
PROPOSED LIQUID WASTE MANAGEMENT PLAN