

## **Section 96 Resource Management Act 1991**

To:  
Consents Operations Section  
Environment Canterbury  
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### **Submission by the Diamond Harbour Community Association Incorporated (the Association) to Environment Canterbury on applications by the Christchurch City Council for discharge of treated wastewater into the coastal waters (Lyttelton Harbour) from the Diamond Harbour and Governors Bay Wastewater Treatment Plants.**

The applications are:  
CRC101835 and CRC101760

#### **Submission**

**A. The Association seeks changes to the duration of the consent and wishes to be heard in support of its submission.**

**B. The reasons for making a submission include:**

The proposed duration of the consent is for thirteen years which is a very long time. The Diamond Harbour Community Association representatives participated in the Lyttelton Harbour Wastewater working party process and support the proposal to cease the discharge of treated wastewater into Lyttelton Harbour and to instead send the wastewater to Bromley for treatment and eventual discharge through the ocean outfall. These two consents are to continue the discharge of wastewater into the harbour, while the necessary plant and pipelines are constructed to enable wastewater to be discharged via Bromley.

The ongoing discharge of wastewater into the Harbour is offensive to many residents (including tangata whenua) and is not consistent with the preservation of the natural character of the coastal environment (including the coastal marine area). A rapid phase-out of the current discharge into the Harbour is supported by other matters of national importance in the Resource Management Act including sections 6(e), 7(a), 7(d), 7(e) and 7(f).

The NZ Coastal Policy Statement (1994) Policy 3.1.1 states that 'Use of the coast by the public should not be allowed to have significant adverse effects on the coastal environment, amenity values, nor on the safety of the public nor on the enjoyment of the coast by the public'. Ongoing discharge into the Harbour adversely affects the environment, amenity values and public enjoyment.

The Community Association seeks a reduction in the duration of consent from thirteen to nine years. This is still a long-time for the public to recreate and fish within what is in effect a treated sewerage dispersal area. We have been told that thirteen years is the time required within the budget set in the CCC Long Term Community Plan for wastewater and water supply upgrades in the Peninsula. The thirteen years is not driven by any technical limitations or resource management requirements and is purely a date chosen for financial reasons.

The Association does not want to see commitments made to wastewater and water upgrades at other Banks Peninsula settlements (e.g. Charteris Bay and Little River) slowed down, but consider that the CCC should raise or allocate additional funding to have the overall wastewater programme speeded up. It is a measure and a priority of a civilized society to adequately treat its wastes, rather than try to pretend they are not there and literally swim in them.

**C. Decision sought from consent authorities**

The consent authorities should reduce the duration of any consent from thirteen to nine years as the ongoing discharge of treated wastewater into Lyttelton Harbour does not promote the sustainable management of natural and physical resources as required by Part 2 of the Resource Management Act and has significant adverse effects on harbour water quality, cultural and amenity values for harbour residents.

Richard Suggate

for the Diamond Harbour Community Association Committee