



MASTERTON DISTRICT COUNCIL

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WELLINGTON REGIONAL
COUNCIL

In reply please quote:

25 MAR 2004

25 March 2003

RECEIVED

Consents and Compliance
Greater Wellington Regional Council
P O Box 41
MASTERTON

Attention: Paula Pickford

Dear Paula

OBJECTION TO MASTERTON WASTEWATER TRIAL CONSENT CONDITIONS

Pursuant to section 357 of the Resource Management Act 1991 (RMA), Masterton District Council (The Council) objects to condition 17 of WAR000333 and condition 10 of WAR020107.

In making these objections, the Council also wishes to reassure Greater Wellington (GW) of its commitment to giving effect to these consents, and maintaining progress with its investigation programme. We advise that the objection to these conditions only affects Phase Two tests. Hence, it is considered that Phase One tests can continue while these objections are being determined, and therefore we are proceeding with action on the Phase One tests unless GW directs otherwise.

The Council is not making these objections lightly and has taken into account concerns raised by experienced practitioners. These objections arise from an assessment made of the consent conditions by our Project Manager, Mr John Harding, an Environmental Engineer with over 25 years experience, and our primary consultant Beca Carter Hollings and Ferner Ltd, an established and recognised engineering consultancy firm with major national and international experience, that also has significant particular experience in wastewater engineering.

..The Council objects to the following conditions:

Condition 17 WAR000333 (Monitoring)

This condition requires daily monitoring of the bores downstream of the trial basins for the first 1 – 2 weeks (incl.) of the application of the wastewater. We consider that this frequency of sampling is not warranted and would impose an unreasonable cost on the Council. We suggest the wording of this condition be amended to reflect the monitoring methodology proposed with the application (ie that the monitoring frequency be determined once the initial borehole testing has been completed and information on the permeability of the soils is known). This would allow appropriate sampling times to be determined in order to capture the plume in the groundwater as it travels downstream.

Condition 10 WAR 02010710 (Multi-aquifer screening)

This condition could restrict the level of information that could be gained from the trials and could adversely affect the council's determination of the feasibility of RI on this site.

It is advantageous to the trials that we have the flexibility to install two piezometers in single boreholes downstream of the trial rapid infiltration basins. This would allow better monitoring of concentration of the effluent plume by obtaining two results from the upper and lower depths of the aquifer rather than a single sample from a piezometer covering the whole depth that would provide an average concentration. There would be minimal possibility of cross contamination between aquifers as the two piezometers would be installed in the same aquifer.

Consent Processing Fees

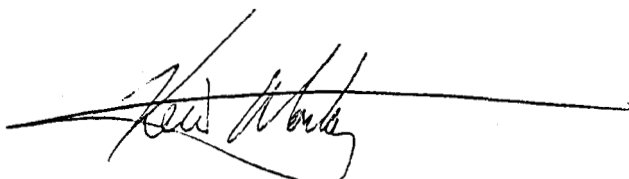
The Council also advises that it is not formally objecting to the fees charged by GW for processing consent WAR000333, as the final fee to be charged was not itemised as a condition of the consent we therefore feel it inappropriate to record this matter as an objection. However, the Council considers that the charges for this consent are not reasonable in terms of section 36 of the RMA, in that the time spent on the consent is not commensurate to the scale of the activity and effects to which the consent relates. The Council therefore seeks the reconsideration of these fees through another forum.

We seek a speedy resolution to these matters, and would be happy to meet with you to discuss the above issues so an acceptable solution can be found.

Please advise of any charges that may be required to process the objection to the above consent conditions.

If you have any queries please do not hesitate to contact the writer.

Yours faithfully

A handwritten signature in black ink, appearing to read 'K J Montgomerie', with a long horizontal line extending to the right.

K J Montgomerie
MANAGER ASSETS AND OPERATIONS