Hearing Before:
Greater Wellington Regional Council

Featherston Wastewater Treatment Plant

Resource Consent Applications

Proposed renewal of existing consents for discharge (and upgrade) of treated sewage to surface water and land, and discharge to air

---

DECISION REPORT OF INDEPENDENT HEARING PANEL

Dated: 8 October 2025

Result: The consents are granted subject to the conditions in Attachment 2

Approved for release and publication on the website of Greater Wellington Regional Council by Mark Ashby (hearing Chair) while reserving the power to make minor corrections and amendments to the grant of resource consent if required under the Resource Management Act s133A. If that occurs the corrections will be published and circulated.

Table of Contents

Glossary

Acronym/Term	Definition
AEE	Assessment of Environmental Effects, prepared by the Applicant
AMP	Air Management Plan
Applicant	South Wairarapa District Council (SWDC)
CIA	Cultural Impact Assessment
Condition type: G DW DL AQ WE EW	 General Discharge to water Discharge to land Discharge to air Wetland diversion Earthworks
DAF	Dissolved air flotation
DO	Dissolved oxygen
EIC	Evidence in Chief
FWWTP	Featherston Wastewater Treatment Plant
GWRC	Greater Wellington Regional Council
NES-F	National Environmental Standards for Freshwater
NPS-FM	National Policy Statement for Freshwater Management
NRP	Regional Natural Resources Plan
MCI	Macroinvertebrate Community Index
OMP	Operations Management Plan
QMCI	Quantitative Macroinvertebrate Community Index
RMA	Resource Management Act
RPS	Regional Policy Statement
s.42A	The GWRC officer's report (prepared under Section 42A of the Resource Management Act)
SWDC	South Wairarapa District Council
TSS	Total Suspended Solids
WIP	Whaitua Implementation Plan

Overview of Project and Hearing

1. Overview

1.1 Introduction

1. Our decision is to grant consent to the applications, subject to conditions as discussed throughout the decision and set out in Attachment 2.

2. This decision report concerns a proposal to renew existing consents for discharge to water and air, subject to a new suite of conditions. The proposal also includes new consenting aspects. Taken together, the required existing and new aspects require consent for:

    1) Discharge of treated wastewater to Donalds Creek;
    2) Discharge of treated wastewater to land (and groundwater) – at a large-scale trial area established for that purpose;
    3) Discharge to air – in relation to potential odour from all processes associated with the wastewater site and activities;
    4) Land use consent for earthworks – for constructed wetlands adjacent to the Treatment Plant, and in relation to the land discharge trial; and
    5) Water permit – in relation to the earthworks associated with the land discharge trial, where they may divert water from a natural inland wetland.

3. The Project requires the discharge to land, water and air resource consents to be issued by Greater Wellington Regional Council (GWRC), in accordance with relevant regional plan provisions. The site of the wastewater facility is designated in the South Wairarapa district plan, and no resource consents are required from South Wairarapa District Council (SWDC). The site of the discharge to surface water is to Donalds Creek. The site of the discharge to land trial area is owned by SWDC and lies adjacent to Longwood West Road.

4. The statutory aspects of the proposal are initially outlined in Section 3.3 below. The granting of resource consents is a process under the Resource Management Act ("the Act" or "RMA").

5. Our reasoning and conclusions are contained in this report (also see Section 1.3 for an outline of the report structure).

6. To assist in our understanding of the environment and the Project, we undertook a site visit on 18th July 2025. For the visit, we began at the Featherston Wastewater Treatment Plant (FWWTP) which houses the UV treatment system, and were accompanied on a tour of all operations by a Wellington Water engineer. We were also accompanied by the GWRC hearing administrator but not by the GWRC reporting officer or representatives of the Applicant. From the Treatment Plant, we also visited the oxidation ponds; discharge point to Donalds Creek; the bridge downstream of the discharge point; and the land discharge trial area.

7. We observed that the treatment ponds were favoured by a significant number of waterfowl, and that the ponds, treatment plant and discharge were largely free of odour. The discharge to Donalds Creek did not appear to carry a heavy load of suspended solids.

1.2 Roles and responsibilities of the parties

8. The roles and responsibilities of the parties, other than submitters in opposition or support, were set out within various application and hearing documentation. However, it is useful to repeat these here for the sake of clarity.

9. SWDC is the holder of the existing resource consents. Until recently, Wellington Water Limited (WWL) has been responsible for progressing the wastewater treatment plant project. However, we understand that under the national re-organisation of three waters[1] services ("Local Water Done Well") that WWL will not be delivering the upgrades and that the Project will transfer to SWDC or the new water entity at some point in time. For the purposes of three waters delivery, SWDC is part of a proposed group comprising the three Wairarapa councils plus Tararua District Council ("Wai+T").

10. Regional consents are required for the Project as the proposal breaches rules in the regional natural resource plan (NRP) relating to Section 15 of the Act, which itself concerns discharges to water, land, and air. GWRC is the consent authority that must determine whether to grant or decline the resource consent applications.

11. As independent commissioners for GWRC, our remit provides us with full autonomy to make the necessary decisions and impose conditions of consent.

1.3 Report structure

12. Resource consent applications require a decision to be made, either granting consent (with or without conditions), or declining consent.

13. Statutorily, although the discharges to water, land and air are separate consent applications, their intertwined effects concern many submitters. For those reasons, we have taken an integrated approach to some aspects of the assessment, and a separate approach where that is necessary to recognise differences between the three consents. In most situations, our report refers generically to the 'proposal', 'project', 'works' or similar variations.

14. At various places we include references to the consent conditions. In our decision we follow the condition naming conventions adopted by the Applicant and GWRC, which split the conditions into groups – mostly related to the type of consent (e.g., discharge to land). To enhance clarity, we typically preface any references to conditions with descriptive text – e.g., "discharge to land Condition DL17". The Glossary on page (iii) of this decision lists the naming / condition types.

15. In some instances, we refer to Applicant, council or submitter representatives by name.

[1] Drinking water, stormwater, and wastewater

Readers should note that the Applicant's Planner is Helen Anderson, and the GWRC Planner is Helene Anderson. The distinction between the two should be clear from the context. Helene Anderson was responsible for preparing the GWRC "Section 42A report". Section 42A of the Act requires such a report to be prepared for a consent application.

2. Project and Environmental Setting

2.1 Location and Existing Environment

16. The proposed location of the works is set out in the Application documents, and Section 5 of the GWRC s.42A Officer's report for the prepared by Helene Anderson. In summary, the Project focuses on the Featherston Wastewater Treatment Plant ("FWWTP") and proposed discharge to land trial area, located south of Longwood West Road and west of Murphys Line. The site (which is large) is variously described by the Applicant and GWRC as being approximately 750 m to 2.0 km south of Featherston – depending on the elements of the project being considered.

17. As noted in the Applicant's assessment of environmental effects (AEE), the predominant winds are from the northwest, while lower speed winds are mostly from the east. The ambient air quality in the area is high due to the prevalent winds and the limited number of odour sources in the area. The site is surrounded by rural and rural residential activities. The Applicant's AEE notes that the closest residential dwelling is around 360 metres from the existing treatment ponds. The locations of other potentially sensitive residential receptors have been noted in the Application documents, including in the air quality assessment.

18. A description of the existing environment can be found in within Section 3 of the Applicant's AEE.

2.2 Environmental Characteristics

Mana Whenua

19. We address mana whenua matters in section 2.2 of our decision.

20. Both Kahungunu Ki Wairarapa and Rangitāne o Wairarapa provided cultural impact assessments (CIA) of the project. These documents were attached as an appendix to the Applicant's AEE. The CIAs provide detail about the cultural context, the project specific views of each iwi, and relevant iwi management frameworks / objectives.

21. The AEE addresses the CIAs and also draws attention to cultural environmental values. From that, we note in particular that the NRP identifies Wairarapa Moana as part of Ngā Taonga Nui a Kiwa (Schedule B of the NRP). See Table 2 outlining the NRP's scheduled environmental values in paragraph 37 below.

22. The NRP defines Ngā Taonga Nui a Kiwa as follows:

> *Those large freshwater and coastal entities from which mana whenua derive cultural and spiritual identity, their status as mana whenua and the associated responsibilities that come with that including those of kaitiaki. These places are*

> *the larger rivers and harbours that have a long history of multiple and complex resource use associated with large populations. Ngā Taonga Nui a Kiwa emphasises the importance of mana whenua relationships with rivers, lakes, harbours and estuaries.*

23. The Applicant's AEE and the GWRC officer's report acknowledge the significance of the relationship between iwi and the environmental characteristics affected by the existing operation of the treatment plant. They also acknowledge the potential effects on those matters by the plant's continued operation under the proposed changes to technology and regulatory control.

Surface Water Quality

24. Based on the Applicant's water quality sampling that had been undertaken, the AEE summarised the surface water quality monitoring results upstream and downstream of the discharge location into Donalds Creek. The information within the application is comprehensive and for a full understanding of the current state of the receiving environment the reader should refer to the AEE.

25. The information provided within the AEE and supporting documentation had water quality being variable, depending on the parameter that was being considered. For example, *E. coli* concentrations are significantly influenced by land use within the catchment, and this is reflected in generally high concentrations in Donalds Creek upstream of the FWWTP discharge. However, concentrations of dissolved reactive phosphorus (DRP) in Donalds Creek upstream of the discharge are generally low enough that they do not limit periphyton[2] growth.

26. The application also considered that Wairarapa Moana was the ultimate receiving for the discharge from the FWWTP as Donalds Creek flows into Wairarapa Moana after joining into Abbots Creek shortly downstream of the discharge from the FWWTP discharge. Wairarapa Moana is identified as having very poor water quality with a Trophic Level Index (TLI) indicating supertrophic[3] conditions.

Groundwater Quality and flow direction

27. The AEE notes that the site is located within the Tauherenikau (Category B14) groundwater allocation zone. The groundwater system of the Tauherenikau zone transitions from unconfined in the north, to semi-confined aquifers to the deep lake basin confined aquifers. The FWWTP site is located within the semi-confined zone[4]. Figure 1 shows

---

[2] The community of microscopic organisms, mainly algae, that grow attached to stable surfaces in freshwater environments like riverbeds and lake bottoms. It forms a key part of the stream ecosystem, providing the base of the food web.

[3] A lake with extremely high nutrient levels, indicating significant nutrient enrichment from sources like agriculture, leading to conditions like poor water clarity and reduced oxygen levels.

[4] Featherston FWWTP Resource Consent Application South Wairarapa District Council, dated 31 May 2024

groundwater monitoring locations and depths within the vicinity of the FWWTP ponds and the proposed land irrigation area.

28. Groundwater generally flows to the south towards Lake Wairarapa. Groundwater level monitoring carried out by GHD during November 2022 suggests that "losing conditions" are likely evident year-round in Donalds Creek immediately north of the un-named tributary, but "gaining conditions" likely exist downstream of the wastewater discharge[5].

29. In terms of groundwater quality, it is noted that:

- Nitrate-N is elevated in the north and east of the site, in the proposed land application area; and
- DRP is elevated in some areas, including the proposed land application area.

30. The monitoring locations and associated groundwater quality is shown in the Featherston FWWTP Water Quality Assessment (16 October 2023) report[6].

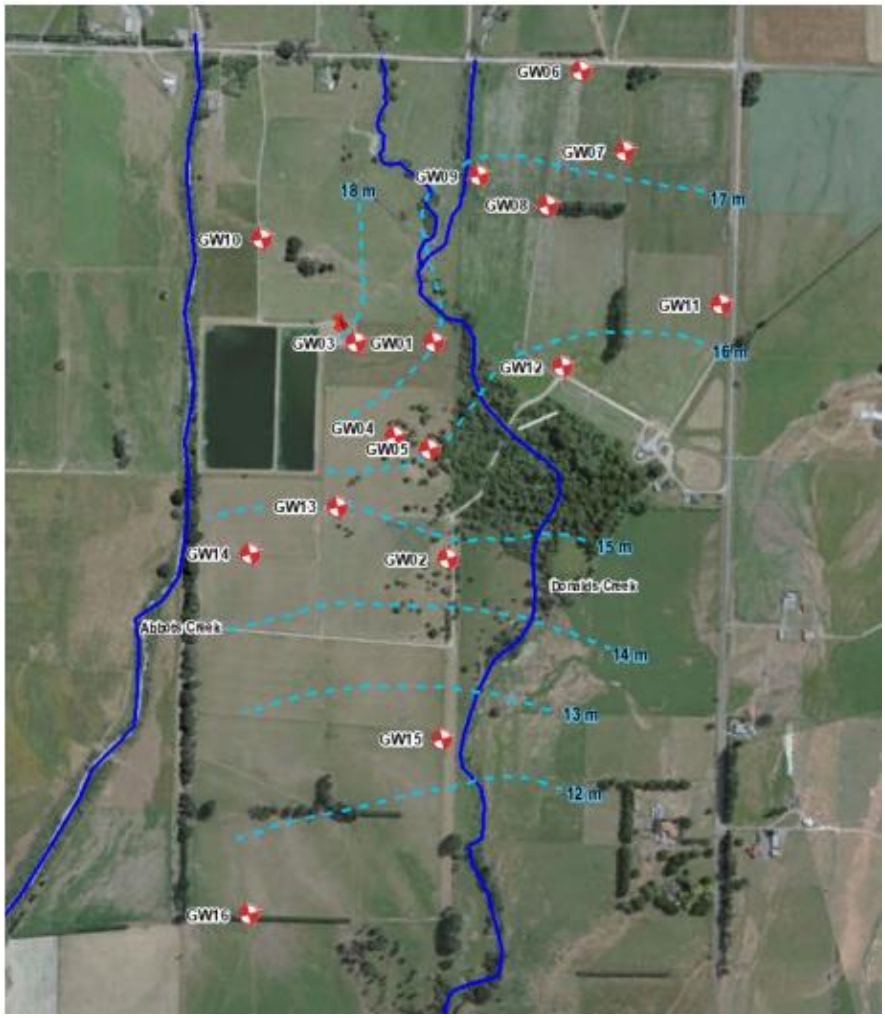

Figure 1 - Groundwater monitoring locations and depth

[5] Featherston WWTP Resource Consent Application South Wairarapa District Council, dated 31 May 2024

[6] Featherston WWTP Water Quality Assessment Wellington Water Ltd, dated 16 October 2023, figures 3.23 and 3.24, pages 41 and 42

Freshwater Ecology

31. Based on the Applicant's ecology reporting, the AEE summarised ecological values for habitats found within the vicinity of the FWWTP and the proposed land irrigation area. It concluded that, overall, the terrestrial and wetland environment is of negligible ecological value, and the Donalds Creek environment was found to be of moderate ecological value.

32. Donalds Creek itself has a range of ecological values and depending on the parameter being considered that value varied. These being:

    1) Periphyton is present in Donalds Creek both upstream and downstream of the treatment plant discharge point although monitoring shows it at higher levels downstream of the discharge;
    2) The Macroinvertebrate Community Index (MCI) predominantly indicates 'fair water quality' with no distinct change between upstream and downstream within the MCI. However, the Quantitative Macroinvertebrate Community Index (QMCI) generally showed a decrease between upstream and downstream of the discharge; and
    3) Native fish species are present within Donalds Creek and the wider catchment. The stream is considered to have ecological significance, due to the presence of At Risk fish species.

33. The Applicant investigated potential natural wetlands areas within a 100 m buffer of the project footprint. Five areas of wetland habitat were identified, the Applicant concluded that those areas have negligible ecological value due to the dominance of exotic species[7]. GWRC's wetland expert agreed with the Applicant's methodology and findings.

Land Irrigation area

34. The land proposed to be used for the land application area is owned by SWDC, and is currently leased for the grazing of dairy cattle. The property is used as dairy support for winter grazing and dairy cows from May to September, with 60 carryover cows grazed throughout the year[8]. The application contained information on the Overseer modelling results for the current farming activity (2021-22) which is replicated below[9].

35. Supporting documents to the AEE state that *"winter grazing of the land application area has resulted in significant removal of grass cover over the area, when compared to un-grazed areas, promoting erosion of soils. High stocking rates during wet periods are also evident, with this expected to result in compaction of soils, high rates of contaminant run-off to Donalds Creek and promotion of high nitrogen leaching rates."*[10]

36. Implementation of the land discharge will see retirement of this area of land from grazing and the removal of such land use practices in the future.

---

[7] Paragraph 102, EIC of Antony Kusabs, 4 July 2025

[8] Featherston WWTP Water Quality Assessment Wellington Water Ltd, dated 16 October 2023, page 5

[9] ibid., page 6

[10] ibid., page 6

Table 1 – Overseer modelling result for current farm activity (2021-2022)[11]

	2021-2022 year
System type	Dairy support
Area (ha)	207.8
Nitrogen leaching loss (total kg N)	7,555
Nitrogen leaching loss (kg N/ha)	36
Phosphorous runoff to water (total kg P)	180
Phosphorous runoff to water (kg P/ha)	0.9

Scheduled Environmental Values

37. The Applicant's AEE and GWRC Section 42A report outline the environmental values as defined by the NRP. Many of those values are focussed on Wairarapa Moana (Lake Wairarapa), which lies approximately 5 km downstream of the wastewater discharge. As noted earlier, the health and mauri of Wairarapa Moana is also a key focus for Rangitāne o Wairarapa and Kahungunu Ki Wairarapa.

38. Potentially relevant Scheduled values, as described by the NRP, are set out in Table 2. We have had regard to these values in our decision making.

Table 2 - NRP Scheduled Values

Schedule Reference	**Environmental Values**
Schedule A2 – Lakes with outstanding indigenous ecosystem values	Wairarapa Moana is listed for wildlife habitat values, specifically indigenous fish diversity and threatened fish species
Schedule B – Ngā Taonga Nui a Kiwa	Wairarapa Moana is listed for a range matters relevant to mana whenua in relation to mahinga kai, whakapapa, historical, environmental concerns. See definition of Ngā Taonga Nui a Kiwa in paragraph 22 above.
Schedule F1 – Rivers and Lakes with Significant Indigenous Ecosystems	Except for in the vicinity of the treatment plant, Abbots Creek and its tributaries (including Donalds Creek) are listed as having high macroinvertebrate community health, and significant indigenous ecosystems.
Schedule F2b - Habitats for indigenous birds in lakes	Wairarapa Moana is home to resident or regular visits from various Threatened or At Risk bird species.
Schedule F3 – Identified natural wetlands	Areas in the northern end of Wairarapa Moana where Abbots Creek enters the lake are identified as natural wetlands
Schedule H1 – Significant contact recreation freshwater bodies	Wairarapa Moana is listed as a significant contact recreation freshwater body.

[11] Featherston WWTP Water Quality Assessment Wellington Water Ltd, dated 16 October 2023, page 5, Table 2.4

Schedule Reference	Environmental Values
Schedule I – Important trout fishery rivers and spawning waters	Abbots Creek, along its length, is listed as an important trout spawning water.

3. Consents and Project

3.1 Project History

Existing Consents

39. The consent history is long and involved. It is set out in detail by the Applicant's AEE and the GWRC Section 42A officer's report. The main points of that history are set out below.

40. South Wairarapa District Council holds three consents related to the wastewater Treatment Plant near Featherston. The consents are:

- WAR970080 [30723] – Discharge permit for the discharge of up to 9,000 cubic metres per day dry weather flow and 12,000 cubic metres per day wet weather flow of treated effluent.
- WAR970080 [20869] – Discharge permit for the discharge of contaminants to air from a wastewater treatment plant.
- WAR970080 [23139] – To discharge contaminants to land.

Existing Processes

41. The FWWTP currently provides secondary level treatment prior to being discharge to Donalds Creek. The key elements of the FWWTP ultimately leading to the discharge comprise:[12]

- Pond One – is where wastewater from the Featherston sewerage network is received and initially held. It operates as the primary oxidation pond, where organics (measured as cBOD5) and some nitrogen are converted into carbon dioxide and nitrate by algae present in the pond, then;
- Pond Two - operates as a maturation pond, allowing suspended solids to settle and enabling solar penetration for disinfection, then;
- UV disinfection to reduce microbes in the wastewater; then
- Treated wastewater is discharged to an approximately 200 metre long channel which ultimately discharges into Donalds Creek.

Primary Treatment

42. The role of the primary treatment at the FWWTP, carried out by the two oxidation ponds, is to reduce loads of suspended solids and associated organic material, nutrients, toxic chemicals and microbial contaminants (such as protozoa, bacteria and viruses) that could

[12] EIC of Ian Ho, dated 4 July 2025, paras 27-34

degrade water quality in Donalds Creek by producing visible plumes, promoting eutrophication or causing ecological toxicity and human health effects.

Ultraviolet (UV) Treatment

43. The existing primary treatment process at the FWWTP generally provides a relatively clear wastewater however, clarity is significantly reduced during summer when conditions are conducive to suspended algae growth within the treatment ponds. The clarity of the wastewater is an important requirement for good UV performance. The effective transmission of UV light through the wastewater ensures that an appropriate dose of UV light is delivered to target microorganisms and that the "shielding" effects from other suspended particles are minimised. Suspended solids can also absorb UV radiation reducing the effectiveness of the disinfection process.

Consent limits

44. The existing consent [WAR970080], dated 12 November 2010, sets following environment limits for wastewater discharge to Donalds Creek (at the point of discharge):

Criteria	**Limits**
Dry weather flow	9,000 m^3/day
Wet weather flow	12,000 m^3/day
BOD_5	40 g/ m^3
Total suspended solids	175 g/ m^3
pH	6 – 9.5
Ammoniacal nitrogen	18 g/ m^3
Total nitrogen	25 g/ m^3
Dissolved reactive phosphorus	8 g/ m^3
Total phosphorous	10 g/ m^3
Faecal coliform bacteria	100,000 cfu/100 mL
A zone of reasonable mixing	

45. The consent does not set a zone of reasonable mixing however, conditions 19, and 21(a), and (b) set 100 metres from the discharge location into Donalds Creek as a location that monitoring must be undertaken for some parameters within Donalds Creek.

46. The existing consent does not include a discharge to land consent for the irrigation of wastewater to land as this is a proposed new activity. However, a consent does exist for a discharge to land related to pond leakage[13].

47. The existing air discharge consent comprises a single condition (condition 26) being: *"There shall be no discharges to air that are noxious, dangerous, offensive or objectionable*

[13] Featherston WWTP Resource Consent Application South Wairarapa District Council, dated 31 May 2024, page 3

resulting from the operation of the Featherston wastewater treatment plant beyond the site boundary".

48. Reporting of stream flow, wastewater flow, wastewater quality and receiving water quality is required on a three-monthly basis – but this does not apply to the air discharge. Annual reporting summarising compliance with all consent conditions is required, which would capture reporting of air discharge compliance.

Expiry and Investigation

49. All three consents were due to expire in August 2012. A replacement application (WAR120294) was lodged in May 2012 for the same permits, with no upgrades proposed. Under section 124 RMA, subject to the discretion of GWRC, the consented discharges were able to continue until the application had been considered and new consents granted.

50. Between 2012 and 2014, SWDC undertook a feasibility study on upgrade options, and in 2014 re-applied for consent to discharge to Donalds Creek. Submitters and GWRC raised concerns that the proposed discharge did not involve a discharge to land aspect. Around the same time, land (Hodder Farm) became available and was purchased by SWDC, with the council deciding to investigate its potential for land discharge.

51. Given the substantial change in character of what needed to be consented (i.e., adding a discharge to land aspect) the 2014 application was put on hold until a new application could be lodged. Again, the existing discharges were allowed continue via section 124 RMA. The new application, this time including discharge to land, was lodged in 2017 but then withdrawn to due to community and GWRC concerns.

52. The SWDC then (in 2020) commissioned work to identify a solutions study for management of Featherston's wastewater disposal. All of the study's shortlisted solutions exceeded the budget of $17 million allocated under SWDC's long term plan. As a result, the solutions were revisited and revised in 2022 so that the budget could be met. The outcome was the project that was notified in May 2023, and described in section 2.1, and for which our decision grants consent.

Community Engagement

53. Details of engagement undertaken related to the proposal are contained with the AEE[14]. In addition, Ms Fairbrother provided a Statement of Evidence on behalf of the Applicant that outlined the community engagement and consultation that had been undertaken as part of the selection of the preferred option, preparation of the application, and since the application was lodged. For a full breakdown of the engagement and consultation undertaken parties should refer to the evidence of Ms Fairbrother[15].

[14] Featherston WWTP Resource Consent Application South Wairarapa District Council, dated 31 May 2024, Section 8, page 105

[15] Statement of evidence of Linda Fairbrother (Project background, engagement and consultation) on behalf of the Applicant, dated 4 July 2025

54. Ms Fairbrother outlined that the initial consultation began in October 2020, with the most recent round of engagement being held on the 8 May 2025. She stated that:

> *The purpose of consultation and engagement across all stages was to raise awareness of the Project, build trust and understanding among the community and key stakeholders, as well as to inform, consult, and involve them to gain feedback on the Project.*[16]

55. In terms of key partners and stakeholders the Applicant engaged with iwi, Fish and Game, Health New Zealand and Department of Conservation throughout the development of the proposal. Prior to the public notification of the application the Applicant also engaged with the QEII Trust.

56. The Applicant has noted the following key engagement rounds:

Pre-notification

1) 3 October 2020 the Applicant held an initial round of consultation on the FWWTP which was carried out via an open day, drop-in style event;
2) 12 November 2020 the Applicant held a short list drop-in session. The session sought the community's feedback on the outputs of Workshop 1 and 2 with the key stakeholders. In addition, to the drop-in session feedback was also received online submissions and paper submissions at the local library for approximately a month after the drop-in session;
3) September 2022, the Applicant launched an engagement campaign to inform the community about the current proposal and provide opportunities for them to provide feedback. The campaign included in-person meetings, distribution of brochures via mail, and local media coverage.
4) November 2022, the Applicant provided further updates to residents and set up a stall at the Featherston Saturday morning vegetable market.
5) The Applicant has provided regular updates on the Project on the Featherston Wastewater Project website.

During and Post notification

57. During the public notification period two drop-in sessions (17 October 2024, and 20 October 2024) and one online technical webinar (hosted on the 22 October 2024) were held.

58. Following closing of the submissions period the Applicant reached out to submitters to seek clarification of concerns raised in submissions. This feedback led to a submitter meeting being held on the 26 February 2025. A question and answer email was later distributed on the 4 April 2025 addressing questions both raised on the night and following. A second meeting was held on 8 May 2025.

---

[16] ibid., para 10

59. The Applicant noted that a range of methods was used to communicate with the community in recognition of the diverse community who will interact with information in different ways. Engagement methods included:

    - Social media posts - Facebook and Instagram
    - Email
    - Print (advertisements and updates published in the Featherston Phoenix, Wairarapa News and Wairarapa Times Age)
    - Posters (particularly for engagement sessions; these were placed in shop windows and on community notice boards around Featherston)
    - Mail
    - Individual meetings with submitters

60. Additional engagement was undertaken with neighbouring landowners regarding water bores. In November 2022, initial contact was made with 27 property owners within the area of interest. A door-to-door survey was undertaken, with three properties contacted. The remaining properties could not be reached, access could not be gained, or the property owners did not respond to the survey. Further follow was made for properties where council records or discussions with GWRC technical advisers suggested that water bores might be present. Visits were undertaken to 211, 228 and 225 Murphys Line in December 2023.

61. In the Panel's opinion, the Applicant has undertaken a comprehensive public consultation exercise by engaging with a range of partners, stakeholders, community members, and neighbours to seek both their input, and views on the project as it has progressed.

3.2 Consent Renewal and Treatment Upgrades

Overview

62. Although the existing consents for discharge to water and air are being renewed (subject to new suites of conditions), the new consents also enable an upgrade of the treatment process. New elements are set out section -2131531312.102 below.

63. A major feature is that the FWWTP will include a two-stage trial for irrigation of treated wastewater to land. The first stage will only proceed once a dissolved air floatation (DAF) clarification process has been installed (outlined in paragraph 70).

64. The significance of the DAF process is that it will remove a high proportion of suspended sediment (prior to UV treatment), and therefore more effectively allow trickle irrigation of treated wastewater to land. For that reason, the initial[17] discharge to land – covering about 3.5 hectares – will commence no later than three years after the consent is granted. Expansion[18] of the discharge to land trial – doubling its size – will commence no later than six years after the consent is granted.

[17] Referred to as "Stage 5" in the consent conditions

[18] Referred to as "Stage 6" in the consent conditions

65. Reflecting that the discharge to land system is a trial, the application has been sought (and granted) for only a 10 year term. As noted by the Applicant, this will enable the irrigation system to be implemented, trialled and tested before SWDC commits to a longer-term solution (and the associated council expenditure).

66. On an ongoing basis, general condition G4 requires SWDC to maintain a Community Liaison Group to act as a forum for consultation and liaison with mana whenua and the community. Part of this engagement between SWDC and the community will be to provide progress updates that will ultimately inform a Future Directions Report.

67. That report, as required by general condition G23, must be provided to GWRC no later than 9 years after the grant of consent (i.e., 2034). Based the monitored outcomes from operation of the FWWTP between now and 2034, the Future Directions Report must confirm the best practicable option for future management and treatment of wastewater discharged from the FWWTP, and the proposed pathway for implementing that option.

New Processes and Consents Sought

68. Some of the main elements of the proposal are depicted in Figure 2 below[19].

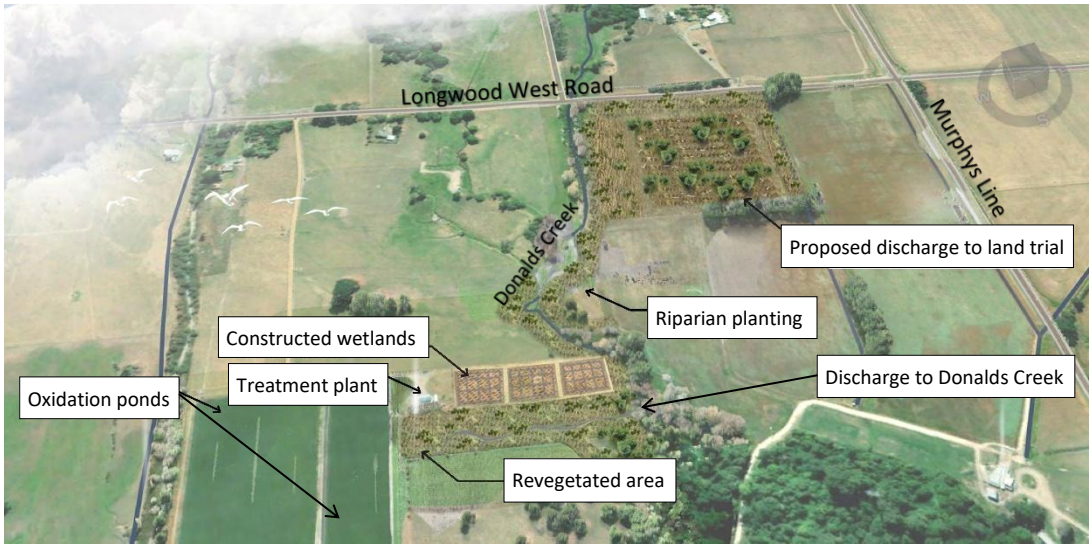

Figure 2 – Artists Impression of Featherston of the Future FWWTP Site

69. The application proposed several upgrades to the FWWTP to be implemented over the 10 year term of the consent. These proposed upgrades are summarised below and are covered in detail in the application. The proposed upgrades and timings are:

1) Stage 1 - Commencement of Riparian planting adjacent to Donalds Creek, to be completed within 15 months of commencement of the consent.
2) Stage 2 - Commissioning of the clarification system, including an online turbidity sensor at the DAF outlet, to be operational within 24 months following commencement of consent.

[19] Adapted from Applicant's "Concept Design Report" – 31 May 2024, with notations added by Hearing Panel

3) Stage 3 - General plant upgrades (e.g. inlet screening, inlet flow meter, provision of backup generator, pond baffle curtains and aerators), to be operational within 30 months following commencement of consent.
4) Stage 4 - Commissioning of wetland and revegetated discharge area, to be operational within 36 months following commencement of consent.
5) Stage 5 - Commissioning of land application area (3.5 ha in total - includes buffer areas), to be operational within 36 months following commencement of consent.
6) Stage 6 - Commissioning of the expansion of land application area (7 ha in total - includes buffer areas). To be operation within 36 months following the commencement of the operation of Stage 5 and no later than 6 years post the granting of this consent.

Dissolved Air Floatation (DAF)

70. The application proposes the installation of a Dissolved Air Floatation (DAF) system as a part of the upgrades to the treatment process. This is effectively a clarification upgrade which will significantly improve the discharge quality through removal of total suspended solids (TSS), solids bound organics and nutrients, thereby also reducing biochemical oxygen demand ($cBOD_5$) and total phosphorus (TP).

71. As noted in paragraph 41 above, UV treatment is already part of the process, after primary treatment in the oxidation ponds. UV treatment will continue, being after the DAF process (which will make UV treatment more effective), and prior to the treated wastewater being discharged to either water or land. It is one of the main mitigation measures for the discharge to land and management of *E. coli* that may enter groundwater.

Management Plans and Monitoring

72. The consents will operate under a number of management plans. Each of these plans must be prepared by a suitably qualified and experience person (a "SQEP"). The consent conditions set out the purpose of the management plans, and detail what they are required to address. Before operating under any of the plans, they must be certified by GWRC as meeting the requirements of the relevant conditions.

73. An equally important aspect of the environmental compliance management system is a "staged management" response that comes into play when monitoring detects that a specified environmental value has been exceeded.

Discharge to Land

74. The application has sought to discharge treated wastewater (a contaminant) onto or into land where a contaminant may enter water (groundwater). This is a new resource consent to allow for the discharge to land related to the new land application and contact areas and a renewal of the existing discharge to land permit related to pond leakage.

Irrigation (discharge) to land

75. The application proposes to trial irrigation of wastewater to land in two Stages, these are known as Stage 5 and 6, located adjacent to Longwood West Road. They involve:

1) Stage 5 - Commissioning of the initial land application area (3.5 ha in total - includes buffer areas), to be operational within 36 months following commencement of consent.
2) Stage 6 - Commissioning of an expansion of the land application area (7 ha in total - includes buffer areas). To be operational within 36 months following the commencement of the operation of Stage 5 and no later than 6 years after the consent is granted.

76. Discharge of treated wastewater to land is to be undertaken via "deficit irrigation"[20] through dripper or sub-surface irrigation. The area to be used for irrigation is to be removed from stock grazing and managed via planting of vegetation to uptake nutrients from the wastewater irrigated to land.

Discharge to constructed wetland

77. A secondary element of discharge to land involves the construction of a treatment wetland for wastewater to enter after passing through the UV treatment plant. The constructed wetland, beside the treatment plant, will involve both horizontal and vertical wetland configurations, with the wetlands being constructed with a liner to prevent leaching to groundwater.

78. Although the application includes the constructed wetland, the assessment of effects for the discharge quality does not rely on the constructed wetlands to provide any contaminant removal.

Discharge to Air

79. The consent application sought to continue discharging odour from all parts of the wastewater treatment facility. A condition similar to the existing condition 29 was proposed. In addition, the Applicant proposed that air discharge would be subject to the development of Operations Management Plan (OMP). The OMP conditions included a "protocol for odour management" with some detail as to what that should include.

80. Leading up to the hearing, discussion between the experts acting for GWRC and the Applicant led to there being conditions related to a separate Air Management Plan. The position immediately prior to the hearing was shown in condition suite "HA2" attached to the hearing evidence of Helen Anderson for the Applicant. The proposed odour management protocol (and other new air discharge conditions) sat within a separate set of Air Quality conditions.

81. Subsequently, the Applicant and GWRC agreed there should be a separate Air Management Plan (AMP). Where necessary, we refer to the revised air discharge condition suite in the following sections, but more particularly in section 11 of our decision.

[20] Deficit irrigation requires that the depth of wastewater applied to the land on any occasion will not result in the soil moisture exceeding field capacity at that time

Attachment 2 contains the final air discharge conditions, including as modified by our findings.

3.3 Resource Consents Required

Regional Consents

82. The Applicant seeks resource consent from GWRC under the NRP and the National Environmental Standards for Freshwater (NES-F).

83. Under section 15 of the Act, consent is required for discharge of a contaminant or water into water. The same section requires consent for the discharge from any industrial or trade premises into air (an air discharge permit). The Act defines industrial or trade premise to include "any premises used for the storage, transfer, treatment, or disposal of waste materials or for other waste-management purposes, or used for composting organic materials". It therefore applies to the Wastewater Treatment Plant and its associated processes.

84. Ms Anderson's s.42A report (section 8.1.1) lists the specific NRP rules which the application is subject to. Those provisions are:

    1) Discharge to Water – Rule R65

       Requires discretionary activity consent where the discharge is an existing wastewater discharge into fresh water.

    2) Discharge to Land – Rule R68

       Requires restricted discretionary activity consent for discharge of treated wastewater, into or onto land.

    3) Discharge to Land – Rule R107

       Requires discretionary activity consent where earthworks will exceed 3,000 m^2.

    4) Discharge to Air – Rule R42

       Requires discretionary activity consent where the discharge to air is from an unenclosed wastewater treatment process.

85. Rule R65 applies to situations where an existing wastewater discharge is sought to be renewed, and the loads of the contaminants monitored under the previous consent are reduced. We heard evidence from both the Applicant and GWRC that contaminant discharges would not be reduced below the limits of the existing consent until the DAF plant was in operation, some two years after consent has been granted.

86. For that reason, we queried whether Rule R66 would come into play during that intervening two year period. Rule R66 appeared to treat that situation as a non-complying activity. Ms Anderson linked interpretation on that point to Policy P92, which requires "progressive" improvement in the quality of discharges.

87. To seek further clarity on this matter, the Panel requested that GWRC obtain legal advice on the interpretation of rules R65 and R66. That advice was subsequently provided to us in a letter from legal counsel engaged by GWRC. The key message from that advice was:

> *In terms of the timeframe across which the reduction in loads is measured, the Rule* [Rule R65] *is entirely silent on that issue, but it is consistent with the interpretation above to also read the reduction required by the Rule in light of the outcome it is implementing (improvement in water quality and particularly, progressive improvement). This means that as long as the discharge achieves the reduction in contaminants over the time period applied for, it would meet this requirement in Rule R65(b)(ii) of the NRP.*[21]

88. The Panel is satisfied by that advice and agrees that, in seeking consent for discharge to water, the applicable rule is Rule R65.

NES-Freshwater Consent

89. There are five locations in the vicinity of the proposed discharge to land area which meet the statutory definition of a "natural inland wetland". The Applicant notes that all direct potential effects (such as earthworks) on those wetlands will be avoided, and the overall likely effects will be "very low" or "no effect"[22].

90. The Applicant's expert ecology report described the wetlands in the following ways:

> *No natural inland wetlands have been identified within the proposed land application areas, and the most 'accurate' natural inland wetlands (even while not being indigenous representative wetlands) are in excess of 100 m from the land application area. Furthermore, the 'new' wetland communities are heavily (if not entirely) supported by overland flows from Donalds Creek, making it unlikely they would be hydrologically affected by the land application processes.*[23]
>
> *All natural inland wetland features were dominated by exotic species in terms of taxa richness and vegetation cover. There was no representative indigenous wetland communities or assemblages present (they were wetter areas of highly modified productive pastural landscape). Therefore, no surveyed wetlands trigger the* [Wellington Regional Policy Statement] *policy 23 criteria for significance. Overall, the natural inland wetland features observed on site are not considered significant.*[24]
>
> *The natural inland wetland habitats observed are highly modified, exotic-dominated communities that have developed largely opportunistic exotic wetland affiliated vegetation communities situated within a grazed pastural landscape. … Overall, the wetland habitat(s) (natural and non-natural) are considered to have Negligible Ecological Value.*[25]

---

[21] DLA Piper to GWRC, Featherson WWTP - advice on applicable discharge rules, 1 August 2025

[22] Paras 6 and 7, EIC of Antony Kusabs, 4 July 2025

[23] Section 4.1.3, Featherston WWTP Upgrades – Ecological Impact Assessment, 1 May 2023

[24] ibid. Section 5.1

[25] ibid. section 6.1

91. GWRC's expert Ms Papworth, in her written technical assessment and in answer to questions during the hearing, agreed with the Applicant's assessment methodology and outcomes.

92. Notwithstanding the assessments of the experts, on a precautionary basis the Applicant sought has consent for earthworks and to divert water within 100 metres of a natural inland wetland. The potential "diversion" relates to activities such as raised mounds associated with the land application area and excavation to establish the constructed wetlands.

93. The permit to divert would be issued by the regional council under section 14 of the RMA. Regulations 45(3) and (4) of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-FW) treat earthworks and diversion as a discretionary activity.

District Consents

94. The Applicant and GWRC did not identify any need for district council resource consents.

95. Both parties noted that the FWWTP land is subject to designation in the operative and proposed versions of the District Plan. The designated land covers approximately 3 ha for the land that contains the treatment ponds, treatment plant, and discharge channel to Donalds Creek. There is a further approximately 20 ha covering the Hodder Farm site which would contain the proposed 3.5 ha to 7 ha discharge to land area.

96. In effect, this means that district council consents are not required for any activity which is consistent with the purpose of the designation. We note that purpose of the designation in the operative district plan is expressed as "sewage disposal", and in the proposed district plan the designation is expressed as "Operation, maintenance, and improvement of the Featherston wastewater treatment plant".

97. On that basis we agree that no district consents are required.

4. Hearing Processes

4.1 Public Notification and Submissions

98. The application was publicly notified 2 October 2024, and the submission period closed 31 October of that year. A total of 29 submissions were received.

99. The submissions identified a range of concerns related to the application which we have considered, at various places in our report, and when making our findings. A summary of the main points raised in each in submission is set out in Attachment 1.

4.2 Commissioners' Minutes and Issue of Decision

100. We issued five Minutes, as follows:

- Minute 1 (23 May 2025) was a standard Minute regarding the exchange of evidence and hearing procedures.

- Minute 2 (30 May 2025) was issued to notify parties of a delay in the issuing of the Section 42A report although still fulfilling all statutory requirements.
- Minute 3 (25 June 2025) was issued seeking clarification as to whether some of the information in the application was current, with the Panel requesting that the Applicant in their evidence due on the 4 July 2025 address the following:
  - Provide and clearly identify updated information in the evidence of each technical expert; or
  - Provide a single consolidated set of updated information, including monitoring data, identifying the location of that information in the publicly notified documents.
- Minute 4 (22 August 2025) was issued to advise of the receipt of the Applicant's right of reply (closing legal submissions) and documenting the documents that had been received post the hearing. In addition, the Panel sought comment from the Applicant and GWRC on questions the Panel had in relation to proposed conditions DW1, DW18, DW15 and DW21.
- Minute 5 (11 September 2025) was issued to officially close the hearing and set a date 2 October for the release of the Panel's decision report.
- Minute 6 (29 September 2025) was issued extending the decision issue date to 8 October 2025.

101. The decision report was released after review by GWRC. The review by GWRC was for the purposes of familiarisation with the report, or correcting technical or factual errors – not for the purpose of requesting amendments.

5. Hearing Overview

5.1 Hearing Schedule

102. The hearing was held over three days (21 – 23 July 2025) in the GWRC council chamber at Masterton. The hearing was formally closed on 11 September 2025 via Minute 5 after we received and considered all further information requested via other Minutes, as well as the Applicant's formal right of reply which was received on 15 August[26].

[26] Dated 13 August

5.2 Appearances

103. We record the following appearances on behalf of the various parties.

For the Applicant	**Role / Expertise and Employer**
▪ Linda Fairbrother	Project Director / Wellington Water
▪ Stefan Corbett	Operations Group Manager / SWDC
▪ Anthony Kirk	Environmental effects / GHD
▪ Ian Ho	Wastewater engineering / GHD
▪ Peter Stacey	Air quality /Air Quality Consulting NZ
▪ Antony Kusabs	Ecology / Boffa Miskell
▪ Jeremy Garrett-Walker	Ecology / Boffa Miskell
▪ Helen Anderson	Planning / GHD
Greater Wellington	Role / Expertise and Employer
▪ Olivier Ausseil	Water Quality and Ecology / Traverse Environmental
▪ Oliver Hunt	Environmental engineering / Pattle Delamore
▪ Hilary Lough	Groundwater / Pattle Delamore
▪ Deborah Ryan	Air quality / Pattle Delamore
▪ Nicki Papworth	Wetland ecology / Pattle Delamore
▪ Helene Anderson	Planning / GWRC
For Submitters	**Representing**
▪ Ami Coughlan	Fish and Game
▪ Karen Krogh	Community
▪ Marguerite Tait-Jamieson	Community
▪ Garrick Emms / Warren Woodgyer	Community
▪ Jessica Cooper / Jill McKenzie	Health New Zealand
▪ Claire Bleakley / Aidan Bigan	Community

104. We heard from the Applicant and their expert witnesses on the first and third days of the hearing. We heard from the council's supporting witnesses on the second day of the hearing.

105. On the third (final) day of the hearing, we heard from submitters and from the Planning experts representing the Applicant and GWRC. We also asked GWRC's other technical experts to summarise their final thoughts after having heard from the Applicant's experts and the submitters.

5.3 Evidence and Statements

106. The evidence of experts, and matters referred to in statements of other parties, is referred to or has otherwise been had regard to in the conclusions and findings of the Panel. All written evidence and statements were available publicly by being uploaded to the GWRC application webpage.

6. Mana Whenua

6.1 Background

107. We consider it important to record and highlight issues relevant to mana whenua. This is not required to resolve issues, but to explain that the discharges to water and land are near Wairarapa Moana (Lake Wairarapa) which is highly significant to mana whenua as detailed in the two CIA provided by Kahungunu ki Wairarapa and Rangitāne o Wairarapa.

108. Kahungunu ki Wairarapa and Rangitāne o Wairarapa are tangata whenua and hold mana whenua as recognised by both tikanga Māori and law through mandate and a historical Treaty of Waitangi settlement. Through this historic association, both iwi also have a long history of exercising kaitiakitanga within the area affected by the discharges.

109. Through the provision of CIA, both iwi identified key issues associated with the proposed activity, and its impact on their cultural, ecological and social values.

6.2 Cultural Impact Assessment

110. The Applicant has provided (as part of the Application) two CIA, prepared by Kara Kenny on behalf of Rangitāne o Wairarapa and Rawiri Smith on behalf of Kahungunu ki Wairarapa. The major concerns associated with the FWWTP construction and operation, cited by the two CIA, are set out in the following paragraphs.

Lack of adequate consultation

111. Rangitāne o Wairarapa highlighted the fact that consultation was not undertaken early enough. Kahungunu ki Wairarapa also identified a lack of meaningful consultation. This was further emphasised in the submission of Rangitāne o Wairarapa.

Inconsistency with Te Mana o Te Wai

112. Both iwi considered the proposed activity was inconsistent with the Te Mana o te Wai provisions of the National Policy Statement for Freshwater Management 2020 (NPS-FM).

113. The Panel acknowledges the changes that have been made to the NPS-FM since the notification of this consent. However, the Natural Resources Plan and Regional Policy Statement contain a number of provisions which provide the opportunity for Te Mana o te Wai outcomes.

114. SWDC have remained committed to working with both iwi to ensure Te Mana o te Wai outcomes can be achieved.

Impact of the proposed activity on iwi values

115. Both iwi indicated the impact of the proposed activity on the wairua of Donalds Creek, Otauira Stream (Abbots Creek) and Wairarapa Moana. These areas have a strong cultural and historic connection to both groups.

116. Both iwi identified that the discharge of treated human waste to fresh and coastal water was inappropriate and inconsistent with tikanga Māori. Both iwi sought that the discharge of treated waste be to land rather than water.

117. Kahungunu ki Wairarapa referenced the Kahungunu ki Wairarapa Te Mana o te Wai policy[27] which contains a number of policies and objectives.

118. Both iwi also identified a number of values that underpin their concerns. Rangitāne o Wairarapa referenced the 'Te Mana o te Wai Expression' document for the GWRC Regional Policy statement. This document identified a number of values that were referenced in their CIA[28].

119. The values included Tino Rangatiratanga, Kaitiakitanga and Mātauranga. The iwi also outlined the weight of responsibility and obligation they had to uphold these values.

120. Rangitāne o Wairarapa acknowledged and welcomed the benefits from plant upgrades, land treatment options and wetland construction. However, the ongoing impact on the values of Rangitāne o Wairarapa will remain.

6.3 Iwi Submission

121. Rangitāne o Wairarapa were the only iwi to lodge a submission. As identified above, they raised concerns regarding a lack of early and meaningful engagement, the impact of the activity on iwi values, particularly the impact on fresh and coastal waters.

122. In her Section 42A report, Helene Anderson provides a useful summary of the issues raised[29]. Ms Anderson considers the development of a framework for ongoing engagement and design will assist with ensuring engagement continues to be prioritised.

123. Ms Fairbrother provided evidence for the Applicant. In her statement of evidence[30] she outlined the engagement process undertaken with iwi since the beginning of the project in 2020. This included workshops, CIA development, one on one hui and site visits. Both Mr Rawiri Smith (for Kahungunu ki Wairarapa) and Mr Horipo Rimene (for Rangitāne o Wairarapa) had meaningful input into the design and the identification of values

124. Further, Ms Fairbrother also outlined the commitment the project team made to building partnerships with both iwi groups[31]. She considered that the proposal aligns to many of the aspects proposed in the CIAs including the transition to a discharge to land regime and improving the removing of TSS[32].

---

[27] Kahungunu ki Wairarapa Cultural Impact Assessment

[28] Rangitāne o Wairarapa CIA

[29] Section 42A Report [paras 359-385]

[30] Statement of Evidence, Linda Fairbrother [paras 102-133]

[31] Statement of Evidence, Linda Fairbrother [para 142]

[32] Statement of Evidence, Linda Fairbrother [para 144]

125. Other issues raised by Rangitāne o Wairarapa were summarised by GWRC in a report highlighting any items of relief specifically sought by some submissions[33]. Note that this is different in content and purpose from the condensed summary of submission points we have included as Attachment 1 to our decision.

126. It is important to also note that both iwi acknowledge the significant investment made to improve the efficiency of the plant and the transition to a land based discharge.

6.4 Assessment and findings

127. Based on the evidence of Ms Fairbrother, the Panel considers that consultation was adequate and appropriate. The Applicant remains committed to continuing to work in partnership with both iwi to develop ongoing and meaningful input, and this intent is reinforced by the consent conditions.

128. The Panel acknowledges the cultural and environmental pain associated with a discharge of treated wastewater to wai, but we are satisfied that the Applicant has taken all practicable steps to avoid, remedy or mitigate the effects.

129. Although explicit reference to Te Mana o te Wai has been removed from the NPS-FM in recent reforms, the Applicant is committed to achieving Te Mana o te Wai outcomes through upgrades, revised monitoring and management provisions.

7. Submissions from the Wider Community

130. Ms Anderson in her s.42A report noted that:

> *A total of 29 submissions were received. Five submissions were received in support or conditional support of the proposal, fifteen submissions were received in opposition, and seven neutral submissions were received. Two submissions did not indicate whether they supported or opposed the application, although both of these indicated that the decision they sought was to decline the application.*[34]

131. Attachment 1 to our decision notes the points contained within each of the submissions. We have reviewed the submissions as part of the hearing process and to inform our decision making. These points set out in Attachment 1 are only high level matters raised in the submissions. The panel has taken into account the full content of the original submissions.

132. Below, we set out the same high level submission points from submitters who appeared and spoke at the hearing. We acknowledge that some of submitters listed in Attachment 1 will have attended at the hearing to support others, but did not speak.

[33] WAR230290 – Featherston Wastewater Treatment Plant, items of relief requested by submitters 7-8-25

[34] Ms Anderson, Section 42A report for the notified resource consent application, dated 30 May 2025

Marguerite Tait-Jamieson – Submission 12

133. Noted the following concerns:

- Non-compliance from SWDC
- There is no long-term, sustainable solution
- Discharge is to Donalds Creek and therefore to Wairarapa Moana which is concerning. Considers consent is for a trial with no long-term solution
- Lots of information to read and short timeframes, consultation

Opposed the grant of consent.

Claire Bleakley – Submission 14

134. Noted the following concerns:

- Discharge to land with high water table
- Pollution to underground aquifers and bores
- Wairarapa moana pollution
- Data sources for wind speed, missing data
- Unaffordable
- Inflow and infiltration to Featherston's sewerage network
- Other technology and methods available for treatment
- Effects on ecological values
- Effects on Tangata Whenua

Opposed the grant of consent.

Karen Krogh – Submission 15

135. Noted the following concerns:

- The application includes inaccurate data and details that are yet to be confirmed
- Does not consider I do not think the application is a well resolved, complete, and rigorous proposition suitable to be submitted as a serous proposal

Opposed the grant of consent.

Te Whata Ora National Public Health Service (Health NZ) – Submission 21

136. Noted the following:

- Wellington Water should work with both iwi, including implementing the CIA recommendations, particularly the development of an engagement plan via an MoU as per the Rangitāne o Wairarapa CIA.
- Recommends that appropriate monitoring conditions are imposed to ensure the discharge is not causing microbiological contamination or significant increases in nutrient concentration leaching and adversely impacting on groundwater (immediate and cumulative effects).
- Recommends that the use of subsurface irrigation is the preferred method of discharge to land near property boundaries or surface water.

- Recommends a consent condition is included requiring the access gate on Longwood West Road to remain locked at all times to prevent public access
- Recommends the continuation of a complaints register and response to support identification and mitigation of any potential issues with odour with the proposed changes.
- Recommends inclusion of a section in the Future Directions Report assessing public health impacts and potential future public health risks. We would welcome the opportunity to be included in the consultation around impacts on public health.
- Requests that the proposed consent condition 42(f) requiring notification to "Regional Public Health" is updated to "Health New Zealand | Te Whatu Ora, National Public Health Service".
- Recommends a condition that specifies the continuation of a Community Liaison Group that meets at regular intervals and Health NZ requests to be part of this group.

Neutral position on the grant of consent.

Garrick Emms – Submission 22

137. Noted the following concerns:

- Not a solution, only a trial
- Volumes of information to read and download
- Further detailed design to still be worked through
- Conflicting statements in the application
- Missing data, information
- Further questions on wetland structures, construction material, use of weather data, vegetation on irrigation mounds, nearby bores, and improvements to water quality

Opposed the grant of consent.

Wellington Fish and Game – Submission 28

138. Noted the following concerns:

- Increase in discharge volumes
- Inflow and infiltration to Featherston's sewerage network
- Consent limits rather than triggers
- Avian botulism
- The land application of wastewater is also supported
- Support riparian vegetation as an important factor to increasing freshwater ecosystem health. It is important that the riparian buffer is wide enough to make a significant contribution to the health of Donalds Creek
- Moderate pollution of water is an effect on water quality
- Monitoring needs to be robust and regular enough to provide information. Requests additional conditions be added to consent application relating to fish monitoring, clarity in Donalds Creek, periphyton growth monitoring, macroinvertebrate monitoring, and macrophyte monitoring

Neutral position on the application.

Rangitane o Wairarapa – Submission 29

139. Noted the following concerns:

140. Threats to water quality, groundwater, and mauri of waterways, and impacts on ecosystems and traditional practices

- Odour emissions that affect communities
- Groundwater diversions near wetlands disrupting sensitive ecosystems in the area

Supported the grant of consent.

8. Other Matters

8.1 Matters Out of Scope

141. There were matters raised within submissions and at the hearing by submitters that we consider are out of scope. Some fall outside the ambit of the relevant planning documents and the consents being applied for, and others are beyond the Panel's statutory remit to consider. These matters include:

- The cost of the proposed works
- Specific (alternative) treatment technologies – other than as proposed by the Applicant
- Reductions in Infiltration and Inflow (I&I) into Featherston's sewerage network
- Effects on property values

142. We are not able to make any direct decisions based on out of scope matters, however some of these matters have usefully informed our understanding of the environment and issues as seen by the community.

8.2 Expert Technical Conferencing

143. Conferencing of technical experts was undertaken on three occasions. These were held very shortly before the hearing, during the hearing, and after the in person hearing was held (but prior to closing of the hearing).

144. As an outcome of conferencing, we received three Joint Witness Statements from the various experts as outlined in section 8.3 below. The conferencing on the three occasions was specific to:

- Wastewater quality/quantity conditions
- Ecological monitoring sites
- Condition wording

145. We note here the role of technical experts in relation to conferencing. In doing so, we take our lead from the Environment Court Practice Note 2023. In addition, the practice note includes sections 5.4, 9.4 and 9.5 in relation to conferences and joint witness statements. In their briefs of evidence, each expert at the hearing was required to acknowledge they

had read and understood the Code of Conduct for expert witnesses (2023 practice note), and that they would follow the requirements of that code.

146. We note the following directions from the practice note Code of Conduct, and in relation to conferencing:

1) An expert witness has an overriding duty to impartially assist the Court[35] on matters with the expert's area of expertise.
2) An expert witness is not, and must not behave as, an advocate for the party who engages the witness. Expert witnesses must declare any relationship with the parties calling them or any interest they may have in the outcome of the proceeding.
3) Every expert witness must agree to comply with the Code of Conduct for such witnesses, and not behave as an advocate for the party who engages the witness.
4) The expert witness must exercise independent and professional judgement and must not act on the instructions or directions of any person.
5) The experts are to confer in the absence of the parties and their legal counsel, except with the express consent of the Court.
6) The experts are not to be instructed as to what may or may not be agreed at the conference.
7) The experts must confer in their roles as experts and are not to act as advocates for the parties who engage them.
8) The experts must only confer on matters within their fields of expertise.
9) While the experts participating in the conference may agree on matters within their fields of expertise, it should be understood that their agreement will not necessarily bind any party to a particular overall outcome, or to the wording of conditions.

147. We are satisfied that the expert witness conferencing respected the intent of the Code of Conduct.

8.3 Joint Witness Conferencing and Statements

(JWS1) Wastewater quality/quantity conditions

148. Joint witness conferencing was attended on 16 July by:

- Ian Ho (Wastewater Engineering) (GHD), for the Applicant
- Anthony Kirk (Environmental Effects) (GHD), for the Applicant
- Helen Anderson (Planning) (GHD), for the Applicant
- Oliver Hunt (Wastewater and Land Treatment Disposal) (PDP), for GWRC
- Olivier Ausseil (Freshwater Quality and Ecology) (Traverse Environmental), for GWRC
- Michelle Conland (Planning), for GWRC

[35] In this case, the hearing Panel

149. Ian Ho was present for matters 2 to 5 as set out in Table 1 of Appendix A in the Joint Witness Statement (JWS). Oliver Hunt was present for matters 1 and 7. Notes were taken by Michelle Conland.

150. The purpose of the expert conferencing was noted as being to identify, discuss, and highlight points of agreement and disagreement on the proposed conditions relating to wastewater quality and quantity.

151. The experts were largely in agreement but noted their disagreement on the average daily discharge volume from the treatment plant. We note that this is a matter that the parties have been unable to agree, and we have therefore reached our own decision on discharge volume, which is discussed in section 9.2 of our report, and included as condition DW1 in Attachment 2.

152. The JWS noted some other matters requiring further confirmation, to be provided at the hearing.

(JWS2) Ecological monitoring sites

153. During the hearing, joint witness conferencing was attended on 21 July 2025 by:

- Jeremy Garrett Walker (Freshwater) (Boffa Miskell), for the Applicant
- Olivier Ausseil (Freshwater Quality and Ecology) (Traverse Environmental), for GWRC

154. In their JWS dated 21 July, the two experts set out agreed recommendations in relation to monitoring sites. We have had regard to those recommendations in making amendments to the proposed conditions.

(JWS3) Condition wording

155. After the in person hearing, online joint witness conferencing was held on 28 and 29 July and attended by:

- Helen Anderson (Planning) (GHD), for the Applicant
- Anthony Kirk (Environmental Effects) (GHD), for the Applicant
- Ian Ho (Wastewater Engineering) (GHD), for the Applicant
- Jeremy Garrett-Walker (Boffa Miskell), for the Applicant
- Helene Anderson (Planning), for GWRC
- Michelle Conland (Planning), for GWRC
- Olivier Ausseil (Freshwater Quality and Ecology) (Traverse Environmental), for GWRC
- Oliver Hunt (Wastewater and Land Treatment Disposal) (PDP), for GWRC

156. The purpose of the expert conferencing was noted as being to refine the wording of the draft conditions recommended by the Applicant and GWRC, based on evidence heard at the hearing.

157. Some of the experts acting for GWRC or the Applicant did not attend the conference. The persons who did not attend were Ms Ryan, Ms Papworth, Mr Stacey and Mr Kusabs. The JWS therefore notes that:

Following the conferencing, the recommended draft conditions were provided to Deb Ryan (Air Quality), Nicki Papworth (Wetlands) both for GW, and Peter Stacey (Air Quality) and Antony Kusabs (Wetlands) for the Applicant, for their review. These experts have confirmed that they are happy with the proposed condition wording in relation to the Air Quality (AQ) and Wetland (WE) conditions respectively.

158. The JWS provided an updated set of conditions clearly showing condition wording that had been agreed, and areas that still remained in contention.

Discharge to Water Consent

9. Discharge to Water Effects

9.1 Overview

159. This section of our decision addresses matters that relate to the discharge quantity, quality and the receiving environment. We note that there was a high level of agreement between experts as to the proposed conditions. There was also general agreement between the experts regarding freshwater monitoring. Therefore, we do not find it necessary to comment or provide findings in relation to every topic or condition and instead focus our findings on those areas that required the Panel to make a decision or modify consent conditions.

160. Key issues to be considered in relation to adverse effects are identified in the AEE and Section 42A report. In our decision, those effects are grouped into the following themes:

- Wastewater discharge volumes
- Surface Water Public health effects
- Surface freshwater quality
- Freshwater ecology effects
- Avian botulism in ponds

Benefits and Positive Effects

161. We were advised by the AEE that the benefits of reconsenting the discharge to water include:

1) That SWDC and the urban Featherston community rely on the wastewater treatment and disposal system to function sustainably and to maintain public health standards.
2) The adopted proposal has also necessarily taken into consideration the financial constraints of the Featherston community.
3) The proposed upgrades will significantly reduce the actual adverse effects on Donalds Creek and Lake Wairarapa from the wastewater discharge.
4) The riparian planting and revegetating of flow paths to be undertaken as part of the proposal will have further water quality benefits.
5) The proposed upgrades will achieve a number of benefits for the water quality of Donalds Creek compared to the current effects of the discharge on Donalds Creek.

162. An extensive alternatives assessment has been undertaken, which has been discussed with key stakeholders over several years. The assessment confirms that the preferred solution is to upgrade the existing infrastructure and undertake a trial of irrigating wastewater to land as proposed, as opposed to any of the other alternatives.

163. Overall, the Panel accepts that the continuing operation of the Treatment Plant, and the proposed upgrades, provides significant benefits to the health and welfare of the community.

9.2 Wastewater Discharge Volumes

The Experts

164. Experts acting for the Applicant and GWRC who provided us with evidence about the wastewater discharge volumes were:

- Mr Kirk (Environmental Effects) for Applicant
- Mr Ho (Wastewater Engineer) for Applicant
- Dr Ausseil (Freshwater Quality and Ecology)
- Mr Hunt (Environmental Engineering) for GWRC

Expert Evidence

165. The previous consent allows for the discharge of up to 9,000 m^3/day as a dry weather flow and 12,000 m^3/day as a wet weather flow[36]. The application sought a 10-year term allowing for a maximum discharge of wastewater from the FWWTP of 11,000 m^3/day.

166. The initial s.42A report[37] had recommended a 95th percentile volume of 9,150 m^3/day, and an annual average 4,150 m^3/day. The JWS[38] produced by experts for wastewater quality/quantity had reached agreement on a 95th percentile volume of 9,150 m^3/day. However, the introduction of the 95th percentile volume resulted in the removal of a maximum daily discharge volume as applied for in the application.

167. The Panel requested further information as to whether they had scope to no longer include a limit on the maximum discharge that could be discharged into the receiving environment, given that the application and notification of the application had included a maximum volume. GWRC advised us that a maximum daily volume would need to be included to remain within the scope of what was notified. The council proposed including an annual average daily volume, an annual 95th percentile daily volume, and a maximum daily discharge volume[39].

168. In relation to the daily annual average discharge volume, there was agreement on the need for the daily annual average. However, there was disagreement between the parties about the annual average volume per day. This area of disagreement is covered in more detail below.

169. GWRC sought a lower annual average discharge volume than the Applicant. The lower volume sought by the council was based on actual flow data from the FWWTP into Donalds

---

[36] Condition 1, WAR970080

[37] Section 42A report for the notified resource consent application, appendix 1, DW1, dated 30 May 2025

[38] Joint Witness Statement of experts wastewater quality/quantity conditions, 18 July 2025

[39] Response to Minute #4 of hearing commissioners, dated 4 September 2025 (updated 8 September 2025)

Creek. This volume (4,150 m^3/day) was that originally proposed in condition DW1 and referred to in the s.42A report[40]. It continued to be the position of GWRC, and was the recommended volume in the council's last response to the Panel[41].

170. We note that the information provided at the hearing showed that the maximum annual average peaked at approximately 4,070 m^3/day. Mr Hunt for GWRC noted that a limit of 4,500 - 4,800 m^3 /d would be a more reasonable reflection of the average flows in an extreme year, with a reasonable buffer to the highest flows recorded to date[42].

171. The Panel's understanding of GWRC's desire for a lower annual average volume, compared to the applied for volume, is to reflect what is occurring in practice. It would therefore not allow for an increase in the annual average volumes discharged from the FWWTP and any associated effects that may occur as a result of this increase.

172. The Applicant did not accept the proposed annual average daily volume of 4,150 m^3/day and maintained that an annual average daily volume of 6,500 m^3/day is more appropriate as a proposed limit. The Applicant provided reasons for this request, being that it would:

    1) allow for the high variability of wastewater flows in Featherston due to the existing poor condition of the wastewater network; and
    2) provide capacity for long term future growth[43].

173. In terms of growth Mr Ho noted:

    The medium growth forecast adopted in the Basis of Design / Concept Design of FWWTP has shown the Featherston population will grow from 2,622 in 2022, to 3,056 in 2032 and 4,418 in 2051. The overall growth in this 30 years period is close to 70% under the medium scenario.

174. Responding to the Panel's question about whether it would be in scope to impose only a 95th percentile and no maximum volume, the Applicant's confirmed that there would be a legal issue if the Panel was to impose no maximum on the consent in light of what was originally applied for[44]. The preference of the Applicant was that the consent conditions refer to an annual daily average (6,150 m^3/day), and an annual maximum flow of 11,000 m^3/day.

175. Ultimately the differences of opinion between the experts has required the Panel to make a decision between the opposing views of the Applicant and GWRC. We have therefore considered those views, and the evidence provided, and have set what we consider to be appropriate discharge volumes. Our findings are outlined from paragraph 178 below.

---

[40] Appendix 4: Updated 27 June 2025

[41] Response to Minute #4 of Hearing Commissioners, dated 4 September 2025 (Updated 8 September 2025), para 5

[42] Summary statement of Olivier Hunt on behalf of Greater Wellington Regional Council, Senior Environmental Engineer, 23 July 2025, para 20

[43] Statement of evidence of Ian Ho (Wastewater Engineering) on behalf of the Applicant, dated 4 July 2025

[44] Memorandum to the hearing Panel of behalf of South Wairarapa District Council, dated 9 September 2025, para 9

Submissions

176. A number of submissions referenced the discharge volumes, particularly in light of the volumes of Inflow and Infiltration (I&I) that enter the oxidation ponds from the Featherston sewerage network. Submissions from Ms Walker, Ms Bleakley, Ms Reed, Mr Hedley, Wellington Fish and Game specifically mention I&I as a matter of concern for the Featherston FWWTP.

177. Although we acknowledge the influence of I&I flows into the volumes of wastewater that enter the oxidation ponds, the ability of the Panel to set conditions on reductions in I&I is outside of the scope of what the Panel can consider in its decision making. However, the Panel is well aware, from submissions and the hearing, that I&I is an issue of concern for the community. It is something that SWDC will need to consider when looking at the longer-term options and the ultimately proposed solution for the FWWTP.

Findings of the Panel (wastewater discharge volumes)

178. The Panel is required to include a maximum daily discharge volume as a consent condition, to ensure that we remain within scope of the original application. This volume is to be 11,000 m^3/day as agreed between the parties.

179. Regarding the annual average daily discharge volume, the evidence suggests that population growth within Featherston over the term of the consent may result in the volume preferred by GWRC being exceeded. Evidence was provided to us at the hearing that only a small investment has been set aside in the current Long-Term Plan for SWDC to deal with I&I issues within the Featherston sewerage network, and further deterioration is possible. In addition, the volume proposed by GWRC in its final set of conditions does not align with the recommendations of Mr Hunt for GWRC. Mr Hunt proposed a volume range that was greater than that proposed in the final set of conditions from GWRC.

180. Taking these matters into consideration, the Panel adopts an annual average discharge volume of 6,500 m^3/day. To do otherwise would impose conditions on the consent holder that the Panel would likely not be met at some point within the term of the 10 year consent.

181. In relation to the 95th percentile we agree with the reasoning provided by the experts for both parties about why such as approach would be technically correct. If this had been a new consent application, and it was within scope of what the Panel could condition, we would adopt the recommendations of the experts. However, that option is not available to the Panel in its decision making.

182. For the reasons outlined above the Panel has adopted the position of SWDC in relation to the discharge volumes from the FWWTP, that is:

> *The rate of total treated wastewater discharge to land and water from the FWWTP shall not exceed:*
>
> - *6,500 m^3/d as a rolling annual average daily discharge volume; and*
> - *11,000 m^3/d as the maximum daily discharge volume.*

9.3 Surface Water Public Health Effects

The Experts

183. Experts acting for the Applicant and GWRC who provided us with evidence about surface water public health effects were:

- Mr Kirk (Environmental Effects) for Applicant
- Mr Ho (Wastewater Engineer) for Applicant
- Dr Ausseil (Freshwater Quality and Ecology) for GWRC

Expert Evidence

184. The AEE contained analysis of monitoring that has been undertaken for *E.coli* concentrations within Donalds Creek upstream, and downstream of the current discharge, and within the discharge itself (after UV treatment). This information is replicated below[45].

Table 3 – Donalds Creek and treated wastewater E. coli summary statistics 2017-2024

***E. coli* measure**	**Donalds Creek**	**Donalds Creek**	**Featherston FWWTP**
(count/100 mL) Monitoring 2017-2024	*Upstream of Wastewater Discharge*	*Downstream of Wastewater Discharge*	*Treated Wastewater*
Median	280/100ml	245/100ml	52.5/100ml
95th percentile	2,175/100ml	2,000/100ml	772.5/100ml
% exceeding 260 count/100ml	54%	48%	17%
% exceeding 540 count/100ml	33%	30%	11%

Table 4 – Donalds Creek and treated wastewater E. coli summary statistics summer 2023-24

***E. coli* measure**	**Donalds Creek**	**Donalds Creek**	**Featherston FWWTP**
(count/100 mL) Monitoring 2017-2024	*Upstream of Wastewater Discharge*	*Downstream of Wastewater Discharge*	*Treated Wastewater*
Median	750/100ml	640/100ml	890/100ml
95th percentile	1,815/100ml	730/100ml	16,390/100ml
% exceeding 260 count/100ml	100%	67%	50%
% exceeding 540 count/100ml	75%	67%	50%

[45] Featherston WWTP Supplementary Water Quality Assessment Wellington Water Ltd, dated 31 May 2024, tables 2 and 3

185. The AEE outlines that samples were collected for measurement of virus concentrations, including enterovirus, adenovirus and norovirus groups in November 2022. The monitoring results and the analysis indicated that discharges from the FWWTP are not meaningfully influencing the virus load within Donalds Creek[46].

186. The evidence of Mr Kirk observed that Donalds Creek upstream of the discharge from the Featherston FWWTP is influenced by upstream land use which can result in high concentrations of *E. coli*. Similar to the AEE findings, Mr Kirk's evidence concluded that sampling indicates that concentrations of *E. coli* and enteric viruses do not meaningfully change due to the wastewater discharge[47].

187. The discharge from the FWWTP current achieves the following *E. coli* concentrations after passing through the UV treatment process:

    1) Between February 2017 and May 2022 – median 39 cfu/100ml, 90th percentile 234 cfu/100ml and maximum 780cfu/100ml; and
    2) Between September 2022 and May 2025 – median 100 cfu/100ml, 90th percentile 474 cfu/100ml and maximum 600 cfu/100ml[48].

188. Dr Ausseil on behalf of GWRC concluded that the current discharge:

> *Appears to generally cause no more than minor effects on the concentrations of faecal indicator bacteria (E. coli) in Donalds Creek.*[49]

189. And after the proposed upgrades, that:

> *Given the current minor effects of the discharge on in-stream concentrations of faecal indicator bacteria (E. coli) in Donalds Creek, the proposed continuation of UV treatment of the discharge and assuming the proposed wastewater quality "trigger levels" will be met, I expect effects on recreational water quality to remain minor in the future.*[50]

Submissions

190. Health New Zealand – Te Whatu Ora National Public Health Service (Health NZ) submitted on the notified application, with Ms Cooper and Ms McKenzie providing evidence on behalf of Health NZ at the hearing.

191. In its written submission Health NZ supported the following consent conditions:

---

[46] Featherston WWTP Water Quality Assessment Wellington Water Ltd, dated 16 October 2023, pages 26, 27, and 66

[47] Statement of evidence Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025

[48] Statement of evidence of Ian Ho (Wastewater Engineering) on behalf of the Applicant, dated 4 July 2025, table 3

[49] EIC of Dr Olivier Ausseil on behalf of GWRC Freshwater Quality and Ecology, dated 29 May 2025, para 30

[50] ibid., para 78

1) That the Applicant maintain appropriate signage at the Donalds Creek outfall, at upstream and downstream publicly accessible locations to Donalds Creek and the boundaries of the FWWTP site including any sites used for land application; and
2) A consent condition is included requiring the access gate on Longwood West Road to remain locked at all times to prevent public access.

192. Submissions from Mr Alexandrov, Ms Tait-Jamieson, Mr Holmes, Ms Bleakley, Mr Hedley, Mr Freeth, Mr Emms, Ms Geange, and Wellington Fish and Game have all raised matters related to water quality. These submissions have been noted here as water quality concerns include microbial contamination of water.

Public Health Conditions

193. The final set of conditions provided to the Panel have maintained the requirement for signage, with this being contained in condition G20. In relation to the access gate, Ms Anderson for the Applicant noted that the gate could not be locked at Longwood West Road as this gate also provides access to farmland[51]. Therefore, condition G3 requires the access gate to the FWWTP to be locked in order to prevent public access. In questioning during the hearing of Ms Cooper and Ms McKenzie on behalf of Health NZ was supportive of the proposed locked gate condition.

194. The final set of proposed conditions contained a time transition for *E.coli* concentrations, the first condition applying prior to the Stage 2 upgrades and then after the Stage 2 upgrades are commissioned. These standards are:

1) Prior to commissioning of Stage 2 - The concentration of **Escherichia coli** (***E.coli)*** shall not exceed 2,000 cfu/100mL in more than 3 out of 12 consecutive monthly samples.
2) After the commission of Stage 2 - The concentration of **Escherichia coli** (***E.coli)*** shall not exceed 200 cfu/100mL in more than 8 samples out of 12 consecutive monthly samples and shall not exceed 500 cfu/100mL in more than 3 out of 12 consecutive monthly samples.

195. We heard no evidence about the appropriateness (or otherwise) of these requirements and have therefore adopted them to be included within the conditions. We do however note that these requirements may change depending on findings from the detailed microbial risk assessment that is to be completed prior to the application of treated wastewater to land. The findings of this assessment may require greater treatment of the wastewater for *E.coli* as a further mitigation measure[52]. The possible public health effects as a result of potential groundwater contamination are covered later in our decision report.

[51] Ms Anderson, Statement of Evidence dated 4 July 2025, para 263

[52] Statement of evidence of Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025, paras 14-17

Findings of the Panel (public health effects of treated wastewater)

196. The Panel's consideration of the effects of the discharge on microbial water quality and human health was informed by information included in the AEE, the Applicant's evidence, reporting officers' evidence, and Health NZ written submission and questioning of the parties at the hearing.

197. Based on the above we accept the conclusion of the Applicant and the s.42A Officer's report that the effects on public health, of discharging fully treated wastewater, will be no more than minor.

9.4 Surface freshwater quality and ecological effects

The Experts

198. Experts acting for the Applicant and GWRC who provided us with evidence about the surface freshwater quality and ecological effects:

- Mr Kirk (Environmental Effects) for Applicant
- Dr Ausseil (Freshwater Quality and Ecology) for GWRC

Expert Evidence

199. The AEE contained a number of reports which covered in detail the existing effects of the discharge on water quality within Donalds Creek, and what changes would potentially be seen in Donalds Creek as a result of the proposed upgrades. For brevity we do not repeat this information here, other than refer the reader to those reports within the AEE[53].

200. On behalf of the Applicant Mr Kirk had prepared Statements of Evidence circulated prior to the hearing, and had presented a Summary Statement of Evidence at the hearing.

201. On behalf of Greater Wellington Regional Dr Ausseil had reviewed the application documentation, submissions and had prepared Evidence in Chief that accompanied the s.42A report. Dr Ausseil also presented a Summary Statement of Evidence at the hearing.

Submissions

202. Submissions from Mr Alexandrov, Ms Tait-Jamieson, Mr Holmes, Ms Bleakley, Mr Hedley, Mr Freeth, Mr Emms, Ms Geange, and Wellington Fish and Game have all raised matters related to water quality.

203. Matters within the submissions range included the effects of the discharge on the ecological values of Donalds Creek, the cumulative effect of the discharge on both Donalds Creek and Wairarapa Moana, that the discharge will cause further pollution, ensuring that any monitoring is adequate to monitor effects, and ensuring that the consent conditions require standards rather than triggers.

---

[53] Featherston WWTP Water Quality Assessment, Wellington Water Ltd, 16 October 2023. Featherston WWTP Supplementary Water Quality Assessment, Wellington Water Ltd, 31 May 2024

Expert Evidence

Visual clarity

204. For the current discharge there was agreement amongst the experts that during periods of low flow within Donalds Creek the discharge can cause a greater than 30% reduction in visual clarity, the information used to inform these opinions being contained in the AEE and supporting documents[54].

205. There was agreement amongst the experts that the DAF plant would be the largest contributor to any improvements seen in visual clarity within the discharge and within Donalds Creek compared to the current plant operation.

206. There was a slight difference of opinion as to whether this improvement would meet the conspicuous change in s107(1)(d) of the RMA and/or the 30% visual clarity change within the proposed consent conditions. The evidence in front of the Panel had the Applicant's experts confirming that the 30% visual clarity change can be complied with. The evidence of Dr Ausseil's shows he thought that exceedances of the 30% clarity change are likely to still occur although are expected to be much less frequent, of relatively short duration and less severe than currently[55].

207. During questioning of Mr Kirk, he was of the opinion that if visual clarity in decreased by more than 30%, then changes at the DAF plant (mainly the addition of more coagulant) can be made to bring the change back within the acceptable limit.

Dissolved reactive phosphorus

208. There was agreement between the experts that the current discharge to Donalds Creek results in a meaningful increase in phosphorus concentrations in the watercourse[56]. Dr Ausseil noted in his evidence that *"DRP concentrations are moderately low and are likely limiting the growth of periphyton upstream of the discharge."*[57] The evidence of Mr Kirk and Dr Ausseil showed that this DRP limitation to periphyton growth was removed downstream of the discharge point as a result of the current discharge. The evidence of Mr Kirk showed that the reductions in DRP concentrations as a result of the FWWTP upgrades are unlikely to be limiting for periphyton growth[58].

209. The concentration of DRP is important in the context for the potential growth of periphyton within Donalds Creek. We consider periphyton later in the decision.

---

[54] Featherston WWTP, Supplementary Water Quality Assessment, Wellington Water Ltd, 31 May 2024, Figure 5

[55] Evidence in Chief of Dr Ausseil on behalf of Greater Wellington Regional Council Freshwater Quality and Ecology, 29 May 2025, paras 81 and 82

[56] Statement of evidence of Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025, para 69

[57] EIC of Dr Olivier Ausseil on behalf of GWRC Freshwater Quality and Ecology, dated 29 May 2025, para 51

[58] Statement of evidence if Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025, para 117

Dissolved Inorganic Nitrogen (DIN)

210. The AEE assessment concludes that the concentration of total nitrogen, in particular inorganic nitrogen species nitrate-N and ammoniacal-N, increases in Donalds Creek as a result of the wastewater discharge[59].

211. Between the experts there was agreement that the FWWTP currently causes significant increases in the concentrations of bioavailable nitrogen in Donalds Creek[60]. The proposed upgrades will see a decrease in DIN entering Donalds Creek, however this will not be significant due to the type of upgrades that are being undertaken at the plant.

212. The concentrations of DIN are important in the context of the potential growth of periphyton within Donalds Creek. We consider periphyton later in the decision.

Ammoniacal Nitrogen

213. The AEE shows that upstream concentrations of ammoniacal-N are typically low (below 0.05 mg/L), however the median increase in ammoniacal-N downstream of the discharge (between 2017-2022), was 0.4 mg/l while the highest recorded ammoniacal-N concentrations downstream over the same period was 1.7 mg/L (these have not been adjusted for pH and temperature). Comparison of fully mixed ammoniacal-N concentrations, normalised to pH 8 and 20°C, is shown in Figure 3 below.

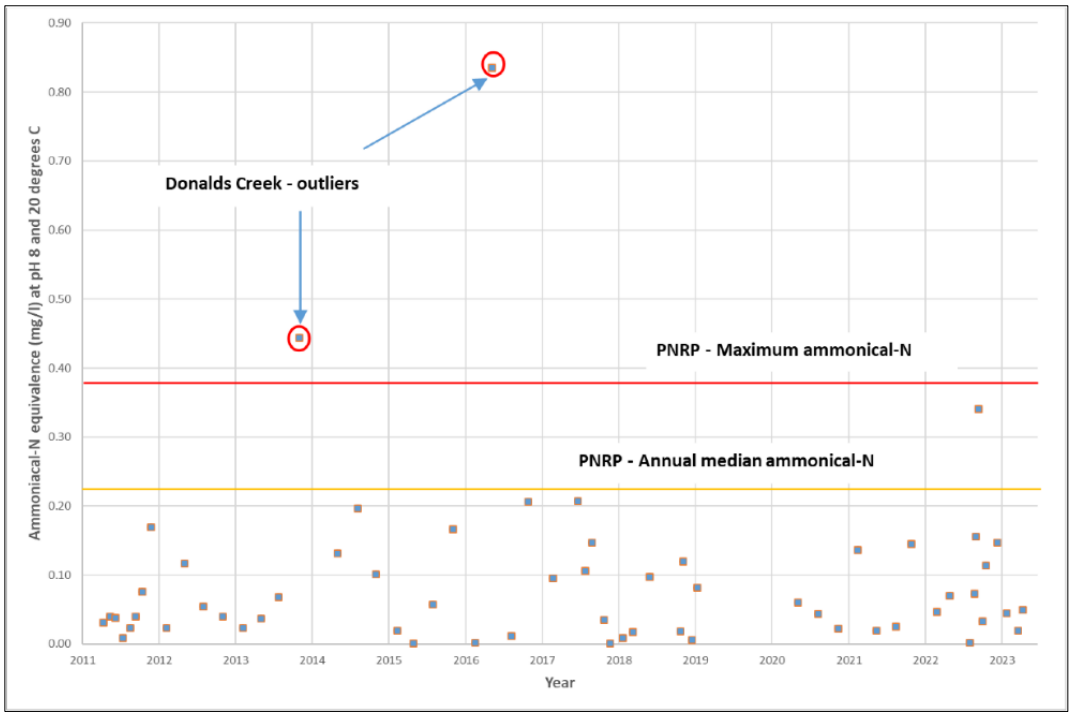

Figure 3 - Ammoniacal-N concentrations, normalised to pH 8 and 20°C on Donalds Creek downstream of the FWWTP

[59] Featherston WWTP Water Quality Assessment Wellington Water Ltd, dated 16 October 2023, page 27

[60] EIC of Dr Olivier Ausseil on behalf of GWRC Freshwater Quality and Ecology, dated 29 May 2025, para 59(b) and Statement of evidence of Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025, para 64

214. The increase in ammoniacal-N results in a reduction in NPS-FM attribute band from Attribute band A (upstream) to Attribute band B in downstream waters. While ammoniacal-N concentrations increase by a notable amount, the neutral pH (typically in the range pH 6.5 to 7.5) limits ammonia formation and the potential for notable ecotoxicity effects.

215. Dr Ausseil on behalf of GWRC explained in his EIC that in relation to ammonia toxicity, currently[61]:

> *The FWWTP discharge results in significant increases in ammoniacal nitrogen concentrations downstream of the discharge, from generally undetectable concentrations upstream to 0.4– 1.7 mg/L downstream of the discharge. These are substantial concentration increases, which nominally exceed the NPS-FM national bottom line and P93(vi) (a median concentration of 0.24 mg/L and a 95th percentile of 0.40 mg/L). However, ammonia toxicity depends on water pH and temperature and the numerical thresholds in both the NPS-FM and P93(vi) are set at a water temperature of 20˚C and pH of 8.0. The AEE concludes that, once corrected for pH and temperature, the ammonia concentrations downstream of the FWWTP discharge generally meet P93(vi). On that basis, the risk of toxic effects in Donalds Creek from ammonia in the discharge appears to be within the bounds allowed for in the NRP P93.*

216. Once the upgrades are completed:

> *Modelling indicates that the potential toxic effects of ammonia will somewhat reduce compared with the current situation and will remain within the bounds of P93, which also corresponds to NPS-FM Band B. The discharge will still, however, result in a significant increase in the concentration of plant-available nitrogen, which will contribute to the risk of causing excessive periphyton growth in Donalds Creek ...*

217. However, Mr Kirk noted:

> *The concentration of TN, and in particular the inorganic nitrogen species nitrate-N and ammoniacal-N, increase in Donalds Creek as a result of the wastewater discharge. The increase in median ammoniacal-N concentration upstream to downstream has resulted in a reduction in the NPS-FM Attribute Band for ammoniacal-N from Attribute Band A (upstream) to Attribute Band B (downstream).*
>
> *Concentrations of ammonia measured between 2017–2024 in Donalds Creek downstream of the discharge have been consistently lower than the NPS-FM national bottom line and the maximum concentration outlined in Policy P93 of the NRP for ammonia toxicity. However, given the concentrations measured to date, and the frequency of monitoring, I consider it likely that ammonia concentrations*

[61] EIC of Dr Olivier Ausseil on behalf of GWRC Freshwater Quality and Ecology, dated 29 May 2025, paras 44, 45, and 88

> *do, on occasion, exceed the NRP guideline maximum of 0.4mg/L as ammoniacal-N at pH 8 and 20 degrees C. Such exceedances would likely be short-term and associated with low-flow conditions in Donalds Creek.*[62]
>
> *My assessment differs from Dr Ausseil's. My opinion is that the maximum concentration of 0.4mg/L has the potential to be exceeded (albeit very infrequently) when unusually low flow conditions are apparent in Donalds Creek. This is reflected in the water quality modelling results, which indicate a probability of this happening in a given calendar year in the order of 2%.*[63]

218. During questioning of Mr Kirk, the Panel enquired more into the 2% figure to understand the scale of any potential effect given the modelling results. The response from Mr Kirk was that there is a 2% chance in any given year that there will be a single exceedance. However, as with any modelling, there will be overs and unders.

219. Both experts agreed that the ammonia concentrations are predicted to remain below the NRP annual median guideline value of 0.24 mg/L.

220. Despite the differences of opinion above we note that the experts have agreed to the proposed conditions which set standards for Ammoniacal-N in DW16.

Dissolved oxygen

221. The Applicant and GWRC experts covered the current knowledge (and associated gaps) in relation to dissolved oxygen, pH and temperature as a result of the discharge and potential effects on these parameters.

222. The experts agreed that the dissolved oxygen monitoring is currently only spot measurements and due to the diurnal cycle of dissolved oxygen a period of continuous monitoring is required to fully understand the effects of the discharge on dissolved oxygen. Despite only having spot measurement the current discharge has been shown to lower dissolved oxygen concentrations downstream of the discharge in Donalds Creek[64]. There was concern from the experts that the high organic matter that is seen at times in the current discharge is resulting the lowered DO concentrations downstream of the discharge. The proposed treatment plant upgrades with the installation of the DAF will significantly reduce this organic load. The submission from Wellington Fish and Game recommended that temperature and DO should be monitored, via a continuous logger if possible, to collate real life data for the long-term consent application.

223. Proposed condition DW12 requires a period of continuous monitoring after the completion of Stage 2, 5, and 6 within Donalds Creek.

---

[62] Statement of evidence of Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025, paras 65, and 66

[63] Statement of evidence of Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025, para 211

[64] Statement of evidence of Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025, para 6 and EIC of Dr Olivier Ausseil on behalf of Greater Wellington Regional Council Freshwater Quality and Ecology, dated 29 May 2025, para 64

Temperature

224. The AEE and accompanying documents had undertaken an assessment of temperature change in Donalds Creek between upstream and downstream of the discharge. The AEE showed that the temperature difference between the upstream and downstream monitoring points continues to be within the range defined in Policy P93 of the Natural Resources Plan (NRP) (change of no more than 3°C)[65].

225. We heard no evidence that the temperature of the current discharge or the future discharge would result in adverse effects on the receiving environment of Donalds Creek. Monitoring of temperature has been included as one of parameters for monthly monitoring within DW11 in Donalds Creek and therefore information will continue to be gathered on the effects of the discharge on the temperatures in Donalds Creek downstream of the discharge location.

Findings of the Panel (water quality)

Finding – Visual clarity

226. In closing legal submissions further information was provided on conspicuous change and the ability to be able to measure it within receiving environments. This is useful context, but it is our understanding that the 30% visual clarity change in the NRP is a numerical translation of conspicuous change in visual clarity[66].

227. We have therefore adopted the visual clarity change contained within the proposed consent conditions and the NRP as the measure to establish whether the discharge complies with the conspicuous change in water clarity.

228. Based on this information the Panel finds that the current discharge is resulting in a conspicuous change in water clarity during low flows in Donalds Creek. The Panel accepts that the water quality effects of the existing discharge are, at times significant, especially in relation to the visual clarity changes as a result of the discharge.

229. DW13 relates to monitoring of visual clarity, the trigger level, and when this monitoring would commence. However, as proposed to us, condition DW13 has the visual clarity monitoring and trigger commencing after the commissioning of the constructed wetland and revegetated discharge area, which is 36 months following commencement of the consent. We have heard or seen no evidence as to why the visual clarity monitoring and triggers should be tied to the constructed wetland and revegetated area. On that basis we have linked the relevant monitoring and triggers to the commissioning of the clarification system which is to be operational within 24 months of the consent commencing.

230. However, within two years of the consent being granted, the proposed upgrades and compliance with the consent conditions will ensure that the discharge is able to comply with the 30% visual clarity change limit in the consent conditions. If the initial treatment

---

[65] Featherston WWTP Water Quality Assessment Wellington Water Ltd, dated 16 October 2023, Figure 3.12

[66] EIC of Dr Ausseil on behalf of Greater Wellington Regional Council Freshwater Quality and Ecology, 29 May 2025, paras 32 and 33

regime after commissioning of the DAF plant does not meet the visual clarity change limit, the Panel accepts that operational options at the DAF plant exist to resolve the issue.

231. The Panel notes that in the application, evidence provided at the hearing, and in closing legal submissions[67] that the constructed wetlands were not relied on as providing treatment of the discharge quality that would enter the receiving environment. We accept that is the case.

Finding – Dissolved reactive phosphorus

232. Based on the information provided by the experts we find that the upgrades to the FWWTP are likely to result in a reduction in the phosphorus concentrations in Donalds Creek downstream of the discharge, when compared to the current discharge effects. However, these reductions are unlikely to be limiting for periphyton growth. Therefore, the discharge will still contribute to the removal of the DRP limitation for periphyton growth that is seen upstream of the discharge in Donalds Creek. This means that conditions in Donalds Creek downstream of the discharge are more conducive to periphyton growth compared to upstream.

Finding – Dissolved Inorganic Nitrogen

233. The information provided in relation to the DIN concentrations in Donalds Creek, is that current concentrations and likely future concentrations will remain around the same. This is due to the proposed upgrades not being targeted to the removal of DIN. We do not need to come to a finding on DIN concentrations as there are no proposed limits for DIN in the proposed consent conditions. However, we note that DIN concentrations are important in the context of potential growth of periphyton within Donalds Creek. We consider that matter further below.

Finding – Ammoniacal Nitrogen

234. The experts had differences of opinion related to the maximum concentration of ammoniacal nitrogen. However, we note their agreement on the proposed consent conditions, that an annual 95th percentile concentration of ammoniacal nitrogen should not exceed 0.4 g/m^3 as measured in samples collected across any consecutive 12-month period. On this basis we accept the recommendation of the experts in relation to the standards for ammoniacal nitrogen.

Finding – Dissolved oxygen

235. The experts have recommended a period of continuous monitoring for DO within Donalds Creek during summer low flows. The Panel has adopted the recommendations of the experts for this monitoring.

236. DW12 relates to continuous monitoring of dissolved oxygen for a period of 10 days during summer after the commissioning of Stages 2, 5, and 6. The condition as proposed in Closing Legal Submissions has monitoring at two locations downstream of the discharge,

[67] Closing legal submission dates 13 August 2025 para 66-68

but no monitoring required upstream of the discharge in Donalds Creek. When comparing the monitoring requirements to the triggers in DW18(a), we believe a comparison to an upstream monitoring location (between U2 and U1) is required. Therefore, in condition DW12, we have added a requirement for an upstream monitoring location to align the triggers, and the monitoring required to inform compliance with the triggers.

Finding – Temperature

237. We heard no evidence that the temperature of the current discharge or the future discharge would result in adverse effects on the receiving environment of Donalds Creek. Monitoring of Donalds Creek has been recommended within the conditions by the experts, the Panel have adopted this recommendation.

9.5 Water ecology effects

The Experts

238. Experts acting for the Applicant and GWRC who provided us with evidence about water ecology effects were:

- Mr Kirk (Environmental Effects) for the Applicant
- Mr Garrett-Walker (Ecology) for the Applicant
- Dr Ausseil (Freshwater Quality and Ecology) for GWRC

Expert Evidence

239. The application contained reports which covered in detail the existing effects of the discharge on the aquatic ecology of Donalds Creek, and what changes would potentially be seen in Donalds Creek as a result of the proposed upgrades. For brevity we do not repeat the information here but refer the reader to those reports within the AEE[68].

240. On behalf of the Applicant Mr Garrett-Walker had prepared a Statement of Evidence which was circulated prior to the hearing, and presented a Summary Statement of Evidence at the hearing.

241. On behalf of GWRC Dr Ausseil had reviewed the application documentation, and the submissions, and had prepared evidence that accompanied the s.42A report. Dr Ausseil also presented a Summary Statement of Evidence at the hearing.

Submissions

242. Submissions from Mr Alexandrov, Ms Tait-Jamieson, Mr Holmes, Ms Bleakley, Mr Hedley, Mr Freeth, Mr Emms, Ms Geange, and Wellington Fish and Game have all raised matters related to water quality/ecology.

---

[68] Featherston WWTP upgrades, Ecological impact assessment –FINAL. Prepared for South Wairarapa District Council, 1 May 2023. Featherston WWTP Donalds Creek 2024 'low flow' supplementary monitoring report, Prepared for South Wairarapa District Council, 31 May 2024

243. Matters within the submissions range included the effects of the discharge on the ecological values of Donalds Creek, the cumulative effect of the discharge on both Donalds Creek and Wairarapa Moana, the discharge causing further pollution, ensuring that any monitoring is adequate to monitor effects, and ensuring that the consent conditions require standards rather than triggers.

Expert Evidence

Macroinvertebrates

244. In relation to significant adverse effects on aquatic life, and the macroinvertebrate communities, there was a difference of opinion between Dr Ausseil and Mr Garett-Walker as to the magnitude of this effect.

245. Information within the AEE including supporting documents and evidence presented at the hearing showed that the discharge resulted in a reduction in the QMCI of greater than 20% on a number of monitoring occasions. This decrease is greater than the proposed QMCI trigger contained in the proposed resource consent conditions for after commissioning of Stage 2.

246. The panel questioned Mr Garrett-Walker on the significance and origin of the 20% QMCI decrease, with Mr Garrett-Walker deferring to Ms Anderson for the Applicant as he believed it was mostly related to an NRP rule. He did however, comment that the macroinvertebrate community recovered after low flow periods and the effects on these communities was only seen during those low flow periods. Therefore, given the fact the macroinvertebrate community recovered he did not see the effects as being significant. In the same line of questioning from the panel to Dr Ausseil, Dr Ausseil provided a response that the threshold was taken from a series of reports commissioned by GWRC in relation to making recommendations for targets in the NRP. The 20% QMCI decline was an attempt at defining a threshold for s107(1)(g) of the RMA, that is an significant adverse effects on aquatic life. Dr Ausseil was of the opinion that the effects of the discharge on the macroinvertebrate communities were significant.

Periphyton

247. Mr Garrett-Walker and Mr Kirk provided evidence on behalf of the Applicant in relation to effects of the discharge on periphyton communities within Donalds Creek, with Dr Ausseil providing evidence on behalf of Greater Wellington Regional Council.

248. Information provided to the Panel shows that Donalds Creek upstream of the discharge can be considered as DRP limited for periphyton growth (that is DRP is the limiting nutrient for periphyton growth). However, the current discharge to Donalds Creek results in this nutrient limitation being removed for periphyton growth[69]. The information in front of the Panel shows that the discharge will continue to remove this nutrient limitation even after the upgrades have been completed to the FWWTP. Information contained in Dr Ausseil's

[69] Dr Ausseil, EIC, 29 May 2025, para 52

EIC[70] shows that conditions in Donalds Creek mean that it is susceptible to excessive periphyton growth.

249. The information contained in the AEE, and presented at the hearing, did not enable an assessment against the Objective 19 periphyton biomass objective or the NPS-FM attribute. This was due to a lack of monitoring data for the parameter.

250. The most recent data with consecutive monthly monitoring and sites with similar characteristics (shading) which was contained in both the evidence of Mr Garett-Walker[71] and Dr Ausseil[72] showed that periphyton biomass and cover was higher downstream of the discharge into Donalds Creek.

251. The JWS dated 11 August 2025 agreed that there should be monthly monitoring between December and May inclusive for the 3 years following commencement of the consent, and for the same period following the commissioning of Stage 5. The Panel asked for further information from the Applicant and GWRC about *"the difference in effects on the receiving environment, when comparing the Final Condition Set and the conditions proposed at the hearing"*. Based on the reply, we understand the JWS position was reached in the context of costs that would be involved in the monitoring needed to enable a full assessment against O19 and the NPS-FM periphyton attribute. In the response provided by GWRC we note that two options were provided to the Panel, one that required monitoring on a monthly basis for three years to enable an O19 and NPS-FM assessment and the one contained in the JWS of the 11 August 2025.

252. The Applicant in their responses preferred to maintain the six-monthly monitoring for each of the three years at the commencement of the consent and after commissioning of Stage 5 of the consent. The Applicant noted that the collection will be useful for future consenting processes[73].

253. Throughout the hearing the Panel were provided with and heard evidence that one of the reasons for the 10-year term was to enable the collection of monitoring data to inform a longer-term solution for the Featherston FWWTP discharge.

Findings of the Panel (water ecology)

Finding – Macroinvertebrates

254. We find that the discharge is currently have a significant adverse effect on the macroinvertebrate community downstream of the discharge location in Donalds Creek. That finding is based on the responses provided by the experts, the supporting technical documents for the NRP, and that the current discharge at times causes a QMCI decline of greater than 20%.

---

[70] EIC dated 29 May 2025, para 51

[71] Statement of evidence dated 4 July 2025, para 49 and 50

[72] EIC dated 29 May 2025, para 56

[73] Memorandum to the hearing Panel on behalf of South Wairarapa District Council, dated 9 September, para 21

255. We also considered the effects of the upgraded discharge to Donalds Creek. There was agreement between the experts that the effects would remain as they are on the macroinvertebrate communities until the DAF plant was operational. Therefore, for a period of up to two years the effects on the macroinvertebrate communities would remain significant.

256. There was general agreement that the conditions within Donalds Creek would improve once the DAF plant has been commissioned. This improvement would mostly be due to a reduction in the amount of suspended material settling on the streambed and causing effects on the macroinvertebrate communities. However, there was some uncertainty about how large this improvement would be when compared to the current state.

257. The Panel accepts that effects on macroinvertebrates from the existing discharge are at times significant. However, within two years of the consent being granted, the proposed upgrades and compliance with the consent conditions will maintain future ecological effects within acceptable limits.

Finding – Periphyton

258. We find that the current discharge results in the removal of the DRP limitation downstream of the discharge, for periphyton growth that is seen upstream of the discharge in Donalds Creek. In addition, conditions within Donalds Creek are conducive to periphyton growth. Based on this information the risk of periphyton growth in Donalds Creek is currently greater downstream of the discharge. This will continue even after the completion of the upgrades to the FWWTP.

259. Given some of the uncertainties related to periphyton growth, the Panel heard that the shorter term proposed for the consent will enable the collection of further in-depth information related to a range of factors associated with the discharge, that will be used to inform a future consenting process. For this reason, we find that monitoring should be undertaken monthly for three years from the commencement of the consent, and for three years following the commissioning of Stage 5 of the proposal. This change in monitoring also requires a modification to the trigger in DW18(f). DW18(f) has been changed to reflect the monthly monitoring. The conditions align with the requirements contained in the original s.42A report.

260. Condition DW15 contains a number of measures to be monitored, references to the purpose of that monitoring, and the frequency at which it is to occur. Minor changes have been made to the table in condition DW15, to remove the doubling up of macrophyte monitoring and to ensure terminology within the table is consistent with the rest of the consent conditions.

Finding – Avian botulism

261. The submission on behalf of Wellington Fish and Game specifically referenced the need for a botulism management plan for the FWWTP. The submission noted that *"Waterfowl can*

accumulate in large groups where the environment allows, and aggregations can fall prey to avian botulism (which is retained in the water and soil of the ponds and wetlands)".[74]

262. During the hearing the Panel asked for Ms Coughlan's thoughts on whether such a management plan needed to be a standalone plan or whether such a plan could be a chapter within an overall plan. Ms Coughlan was comfortable with either, as long as the plan was easily found by those needing to respond to a potential botulism outbreak. The JWS dated 11 August 2025 included the requirement for an avian botulism management plan within the Operations Management Plan. This management plan is to be prepared in consultation with Wellington Fish and Game (proposed condition G13(k)).

263. The Panel heard no evidence against inclusion of a botulism management plan as a condition of consent, and therefore adopts the recommendation contained in the JWS. Note that the submission was submitted by Wellington Fish and Game but the proposed condition referenced New Zealand Fish and Game. We have amended the wording to be Wellington Fish and Game.

9.6 Wairarapa Moana (Lake Wairarapa)

264. This section of our decision addresses matters raised mostly in submissions, but also in evidence.

The Experts

265. Experts acting for the Applicant and GWRC who provided us with evidence around Wairarapa Moana were:

- Mr Kirk (Environmental Effects) for the Applicant
- Dr Ausseil (Freshwater Quality and Ecology) for GWRC

Expert Evidence

266. The AEE and associated documents outline how Wairarapa Moana (Lake Wairarapa) is an important consideration as Donalds Creek flows into the lake and it is therefore the ultimate receiving environment[75]. Donalds Creek joins Abbots Creek downstream of the FWWTP discharge point, and then approximately 2 km downstream flows into Wairarapa Moana. It is a shallow (< 2.5 m deep) freshwater lake covering around 78 km^2. The lake is considered to be of both national and international importance due to its significant cultural, ecological, recreational and natural character values. A National Water Conservation Order was placed on Lake Wairarapa in 1989 recognising the high ecological values of the area[76].

---

[74] Submission on the Featherston Wastewater Treatment Plant Consent WAR230290, dated 31 October 2024, para 18

[75] Featherston WWTP Resource Consent Application South Wairarapa District Council, dated 31 May 2024, page 12

[76] ibid., page 39

267. Wairarapa Moana has very poor water quality with a Trophic Level Index (TLI) indicating supertropic conditions. Both phytoplankton and total phosphorus are below the NPS-FM national bottom line with a number of prescribed attribute standards in the NRP not currently being met[77].

268. The AEE goes on to state that:

> *The removal of sediment and progressive reduction in phosphorus load is in accordance with the Ruamāhanga WIP's longer-term objectives to remove sediment and phosphorus from the receiving environment (Lake Wairarapa) which is currently below the national bottom lines for phosphorus and phytoplankton. One of the objectives for the proposed upgrades was to contribute to reducing the load of sediment and phosphorus to Lake Wairarapa.*

269. The table below shows the proposed reductions in contaminants in Wairarapa Moana, resulting from the proposed upgrades.

Table 5 – Annual flows and mass loads contributing to Lake Wairarapa, current and after proposed upgrades

	Annual flow	TN load	TN contribution	TP load	TP contribution	TSS load	BOD5 load
unit	**Mm3**	**Tonne/yr**	**%**	**Tonne/ yr**	**%**	**Tonne/ yr**	**Tonne/yr**
Tauherenikau River	283	102	11%	3.0	6%	-	-
All other tributaries	236	740	80%	41	87%	-	-
Groundwater	12.0	49	5%	0.4	1%	-	-
Rainfall	90	-	-	-	-	-	-
Barrage inflow	75	-	-	-	-	-	-
Donalds Creek US	13	17	2%	0.40	1%	152	26
Donalds Creek DS - current	15	33	4%	2.8	6%	229	67
FWWTP Current	1.3	16	2%	2.4	5%	77	42
FWWTP Future - 5 year	1.4	11	1%	1.08	2%	11	10
FWWTP Future - 10 year	1.4	12	1%	1.11	2%	11	10
Total inflows to Lake Wairarapa	***710***	***920***	-	***48***	-	-	-

270. The contribution of nutrients and sediment from the FWWTP are small in comparison to the broader catchment. However, Mr Kirk for the Applicant outlined in his evidence that the proposed improvements align with the recommendation of the Ruamahanga Whaitua Implementation Programme (WIP), which has identified phosphorus and sediment as key contaminants requiring control for lake improvement[78].

271. Dr Ausseil in his EIC on behalf of GWRC notes that the FWWTP is the most significant point-source discharge in the Lake Wairarapa catchment and is estimated to contribute c. 2% of the annual TN load and 5% of the TP load currently entering Lake Wairarapa[79].

---

[77] ibid., page 39

[78] Statement of evidence of Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025, para 10

[79] EIC of Dr Olivier Ausseil on behalf of GWRC Freshwater quality and ecology, dated 29 May 2025, page 58

272. Mr Kirk in his evidence explained that the current sediment contribution from the FWWTP into Donalds Creek is predicted to be about 80 tonnes/year. Placing this in the context of the catchment, monitoring upstream of the FWWTP discharge into Donalds Creek has landuse upstream contributing 152 tonnes/year, with this increasing to 229 tonnes/year downstream of the discharge. The discharge is, therefore, currently a significant contributor to sediment loads into Wairarapa Moana[80]

273. Mr Kirk at paragraphs 118 to 122 of his evidence outlines the expected improvements to be seen as a result of the proposed upgrades however, does go on to say that:

> *The reduction in nutrient and sediment concentrations in the lake may not be detectable against background variation, due to the large lake extent, existing lake sediment influence, and influence of the surrounding catchment. However, when considered in the context of the mass load contribution from the FWWTP, the reductions are significant.*[81]

Submissions

274. Submissions from Ms Tait-Jamieson, Mr Holmes, Ms Bleakley, Mr Hedley, Mr Freeth, Ms Geange, Health NZ, Mr Trafford, Wellington Fish and Game, and Rangitane o Wairarapa have all raised matters related to Wairarapa Moana.

275. Matters within the submissions include the effects of the discharge on the ecological values of Wairarapa Moana, the cumulative effect of the discharge on Moana Wairarapa, and that the discharge will cause further pollution.

Findings (Wairarapa Moana)

276. Based on the information and evidence provided to the Panel we find that the FWWTP contributes contaminates to Wairarapa Moana, although the contribution may be of a small percentage compared to the wider catchment, it still adds to the cumulative effects on Wairarapa Moana. The proposed upgrades will see a significant reduction in the BOD_5 and TSS loads discharged to Wairarapa Moana, in addition the proposal will also see a reduction in TN and TP loads discharged to the Lake.

277. Although the application and evidence provide no conditions of consent for monitoring of Wairarapa Moana in relation to the discharge we note that the monitoring that is to be imposed via conditions will allow monitoring of the loads that are discharged to Donalds Creek and therefore Wairarapa Moana. This will enable monitoring of the proposed reductions in contaminates compared to the current discharge into Donalds Creek.

---

[80] Statement of evidence of Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025, para 78

[81] ibid., para 119

Discharge to Land Consent

10. Land Discharge Effects

Overview

278. Key issues to be considered in relation to adverse effects are identified in the AEE and the Section 42A report. In this decision, those effects have been grouped into the following themes:

- Land irrigation rates
- Land and groundwater public health effects
- Groundwater effects from irrigation
- Heavy metals in soils
- Natural Inland wetlands

Benefits and Positive Effects

279. We were advised that the benefits of consenting the discharge to land include:

1) Reduction in the volumes of wastewater discharged to Donalds Creek.
2) That SWDC and the urban Featherston community rely on the wastewater treatment and disposal system to function sustainably and to maintain public health standards.
3) The adopted proposal has also necessarily taken into consideration the financial constraints of the Featherston community.
4) The proposed upgrades will significantly reduce the actual adverse effects on Donalds Creek and Lake Wairarapa from the wastewater discharge (i.e. removal of some of the discharge to Donalds Creek).
5) The riparian planting and revegetating of flow paths to be undertaken as part of the proposal will have further water quality benefits.
6) The proposed upgrades will achieve a number of benefits for the water quality of Donalds Creek compared to the current effects of the discharge on Donalds Creek.

280. An extensive alternatives assessment has been undertaken, which has been discussed with key stakeholders over several years. The assessment confirms that the preferred solution is to upgrade the existing infrastructure and undertake a trial of irrigating wastewater to land as proposed, as opposed to any of the other alternatives.

281. Overall, the Panel accepts that the continuing operation of the Treatment Plant provides significant benefits to the health and welfare of the community.

10.2 Land irrigation rates

The Experts

282. Experts acting for the Applicant and GWRC who provided us with evidence about land irrigation rates were:

- Mr Kirk (Environmental Effects) for the Applicant
- Mr Hunt (Environmental Engineer) for GWRC
- Ms Lough (Groundwater) for GWRC

Expert Evidence

283. The AEE outlined how the Applicant proposes to implement partial irrigation of wastewater to land with wastewater from the Featherston FWWTP. The land application is proposed to adopt a deficit irrigation approach, whereby irrigation only occurs when soils are not saturated and have capacity to accept treated wastewater. This limits the rate of treated wastewater leakage to groundwater, and allows greater inground treatment of the applied treated wastewater[82].

284. The evidence of Mr Kirk and Mr Ho outlined that the proposed irrigation is effectively a trial to monitor and optimise an irrigation regime to inform an understanding of the long-term land requirements and operability of the scheme to best manage a transition of discharging Featherston's wastewater discharge from water to land disposal. This trial was to involve:

1) An initial discharge area of 3.5 hectares (including buffer zones);
2) Expansion from to 3.5 hectares to 7 hectares (including buffer zones);
3) Monitoring of groundwater levels and contaminants upstream and downstream of the irrigation area; and
4) Varying irrigation rates (within the confines of deficit irrigation) to match soil moisture conditions, and climatic conditions.

285. Mr Hunt for GWRC was of the opinion that the proposed irrigation system is generally low risk and outline the reasons for this in his EIC[83]. We do not repeat those reasons here. This opinion was reconfirmed by Mr Hunt in his summary statement of evidence[84] and presentation to the Panel.

286. There was general agreement between the experts on the suitability of the land irrigation rates for the discharge area.

---

[82] Featherston Wastewater Disposal Groundwater modelling assessment. Wellington Water Ltd, 12 February 2025.

[83] Technical assessment of Olivier Hunt on behalf of GWRC (Senior Environmental Engineer), dated 30 May 2025, para 26

[84] Summary statement of Olivier Hunt on behalf of GWRC (Senior Environmental Engineer) dated 23 July 2025, paras 4 – 6

Submissions

287. Submissions from Mr Alexandrov, Mr Lucock, Mr Walker, Mr Holmes, Ms Bleakley, Ms Reed, Mr Hedley, Mr Freeth, Te Whata Ora National Public Health service (Health NZ), Mr Emms, Ms Geange, Mr Geange, Ms Dianne, Ms Leahy, and Rangitane o Wairarapa raised matters related to the suitability of the land for irrigation especially in the context of the high groundwater table.

288. The list of matters raised included the suitability of the proposed land irrigation area due to high groundwater table, not enough information being available on the soil types throughout the proposed irrigation area, and the ability of the soil to handle the irrigation volumes proposed as part of application. There was support from some submitters for the subsurface discharge compared to options that had previously been considered, and for a discharge to land over discharge to water.

Findings of the Panel (land irrigation)

Finding – Irrigation rates

289. The Panel's consideration of the effects of the proposed irrigation method (deficit irrigation) and the suitability of the land to be irrigated via this method was informed by the information provided by the Applicant's and GWRC experts.

290. Based on the above we accept the conclusion of the Applicant and s.42A Officer's report that the proposed irrigation method is suitable for the land that the wastewater is to be discharged to.

Finding – Conditions

291. The Panel finds that the consent conditions related to irrigation of wastewater to land are suitable and have adopted those that have been recommended by the experts.

10.3 Land and Groundwater Public Health Effects

The Experts

292. Experts acting for the Applicant and GWRC who provided us with evidence about land and groundwater public health effects were:

- Mr Kirk (Environmental Effects) for the Applicant
- Ms Lough (Groundwater) for GWRC

Expert Evidence

293. The AEE contained a number of reports that modelled groundwater movement within shallow groundwater from the proposed land irrigation area. The most recent of these

reports being completed in 2025[85]. This document outlined:

1) That the travel times for groundwater to flow towards the nearest potable bore is conservatively modelled to be between 0.4 and 3.5 years.
2) That the groundwater travel time is important because even the very small amount of microbes that may survive the current UV disinfection typically die off within the groundwater system within 1 year.
3) Upgrades to the FWWTP will significantly improve the disinfection of wastewater, such that residual microbe concentrations are expected to be lower than current levels and very low in general.
4) That a detailed quantitative microbial risk assessment is completed following implementation of the DAF unit to provide a refined understanding of risk to water users. If this assessment identifies that the risk to water users is unacceptable, various options are available to mitigate the risk, for example installation of stronger treatment (e.g. enhanced UV treatment) to further reduce microbe concentrations prior to land application.

294. Mr Kirk presented evidence on behalf of Applicant[86]. The summary of Mr Kirk's evidence was that the travel time to the nearest of groundwater users is sufficiently short as to warrant more detailed risk assessment. However, he did note that were this risk was determined to be elevated, it can be readily mitigated by any of the following:

1) Additional disinfection of wastewater directed to land; or
2) Provision of small volume UV disinfection units for the appropriate residents, with these common and recommended in areas where shallow groundwater is utilised for potable water; or
3) Provision of an alternate water supply to appropriate households, with this most readily provided by installation of a bore targeting a deeper groundwater unit.

295. With such practical options for mitigation available, it was the opinion of Mr Kirk that the risk to public health associated with discharges from the land disposal area could be readily managed.

296. Ms Lough provided evidence on behalf of GWRC[87] and noted that the application had indicated potential travel times for groundwater of less than 1 year to the nearest bore (193 Murphys Line, 550m to the south) and for other downgradient bores (211, 228, and 292 Murphys Line, up to 1700 m away) for some parameter combinations. Ms Lough considered that a 1-year travel period is considered to provide sufficient time for pathogen attenuation before groundwater reaches the bores. Ms Lough noted that the Applicant's assessment indicates that there may be a contamination risk with increased pathogens as

[85] Featherston Wastewater Disposal, Groundwater modelling assessment. Wellington Water Ltd, 12 February 2025

[86] Statement of evidence of Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025, paras 131-134

[87] Technical assessment of Hilary Rough on behalf of GWRC, Technical Director - Water Resources, dated 29 May 2025, para 28(IX)

a result of the wastewater discharge. This could potentially result in a more than minor effect to groundwater quality.

297. At the hearing Ms Lough considered that proposed conditions DL5 and DL6 covered off the concerns she had originally raised and given the level of treatment of the wastewater that the original assessment with the 1-year travel time is very conservative.

Submissions

298. Health New Zealand – Te Whatu Ora National Public Health Service (Health NZ) submitted a submission on the notified application. Ms Cooper and Ms McKenzie provided evidence on behalf of Health New Zealand – Te Whatu Ora National Public Health Service (Health NZ) at the hearing.

299. In its written submission Health NZ recommended the following consent conditions:

1) That appropriate monitoring conditions are imposed to ensure the discharge is not causing microbiological contamination or significant increases in nutrient concentration leaching and adversely impacting on groundwater (immediate and cumulative effects);
2) That the use of subsurface irrigation is the preferred method of discharge to land near property boundaries or surface water; and
3) That the Applicant maintain appropriate signage at the boundaries of the FWWTP site including any sites used for land application.

300. Submissions from Mr Alexandrov, Mr Lucock, Ms Bleakley, Ms Reed, Mr Freeth, Mr Geange, Ms Connell, Ms Leahy, and Rangitane o Wairarapa raised concerns around the potential contamination of groundwater. The contaminates of concern were microbial contamination measured via *E. coli* and nitrate.

301. In addition to concerns raised around microbial contamination of groundwater, the potential impacts of nitrate contamination were raised. The primary evidence of Mr Kirk stated that *"No significant change in downgradient nitrogen concentrations is predicted to result from the proposed land application activity."*[88] The proposal would therefore see similar changes in groundwater quality as is currently seen at the site from existing land use[89].

302. Condition DL13 has been proposed for the monitoring of nitrate concentrations within bores within the irrigation area including an upgradient bore. In addition, to monitoring DL13 contains triggers with exceedance of the trigger levels resulting in the implementation of a staged management response, as set out in the EMMP.

[88] Statement of evidence of Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025, para 127

[89] Statement of evidence of Anthony Kirk (Environmental Effects) on behalf of the Applicant, dated 4 July 2025, para 127

Findings of the Panel (land and groundwater public health)

Finding – Public health effects

303. The Panel's consideration of the effects of the discharge on microbial water quality in groundwater and potential human health was informed by the evidence from the experts for the Applicant and GWRC.

304. Based on the above we accept the conclusion of the Applicant and s.42A Officer's report that the effects of discharging fully treated wastewater on groundwater contamination should be no more minor. However, if the quantitative microbial risk assessment identifies that the risk to water users is unacceptable, various options are available to mitigate the risk.

305. The information in front of the Panel is that the nitrate concentrations within the irrigation area will be no greater than current land use. The proposal includes monitoring of nitrate concentrations within bores within the irrigation area including an upgradient bore. In addition, the proposal contains triggers with exceedance of the trigger levels resulting in the implementation of a staged management response, as set out in the EMMP. Based on this information the effects of nitrate concentrations within groundwater as a result of the proposal should be less than minor, with monitoring conditions to ensure this is the case with triggers and implementation of a staged management response if an effect was to be observed.

Finding – Conditions

306. The final set of Conditions and in particular Conditions DL5, DL6, and DL7 that require monitoring of bores identified within the Featherston Wastewater Disposal Groundwater modelling assessment (dated 12 February 2025), the completion of a quantitative microbial risk assessment, further actions if the risk assessment indicates an actual or potential increased pathogen risk to human health at any of the bores, and implementation of the identified actions (if required).

307. Condition DL13 requires monitoring of nitrate concentrations within bores within the irrigation area including an upgradient bore. In addition, to monitoring DL13 contains triggers with exceedance of the trigger levels resulting in the implementation of a staged management response, as set out in the EMMP.

308. The Panel finds that the proposed consent conditions related to public health are appropriate and have adopted them in our decision.

10.4 Groundwater effects from irrigation

The Experts

309. Experts acting for the Applicant and GWRC who provided us with evidence on groundwater effects as a result of irrigation of wastewater were:

- Mr Kirk (Environmental Effects) for the Applicant
- Mr Ho (Wastewater Engineer) for the Applicant

- Mr Hunt (Environmental Engineer) for GWRC
- Ms Lough (Groundwater) for GWRC

Expert Evidence

310. The AEE and supporting documents outlined the current groundwater quality within the vicinity of the FWWTP treatment ponds and the proposed irrigation area. In summary it found:

    1) Very low ammoniacal-N (most below laboratory detection limits), including groundwater wells down hydraulic gradient of the ponds. Indicating that pond leakage is not having an obvious adverse effect on groundwater quality;
    2) Nitrate-N is elevated in the north and east of the site, in the proposed land application area; and
    3) DRP is elevated in some areas, including the proposed land application area.

311. The monitoring locations and the groundwater quality at these sites is shown visually in the Featherston FWWTP Water Quality Assessment (16 October 2023), in Figures 3.23 and 3.24.

312. The evidence of Mr Kirk covers the potential effects on groundwater and outlines:

    1) That deficit irrigation will ensure that wastewater is absorbed without causing excessive drainage to groundwater; and
    2) That planting on the irrigation area will mean that nutrient impacts on groundwater quality are predicted to be generally equivalent to the current land-use activities.

313. In relation to the constructed wetlands, Mr Ho's evidence stated *"The constructed wetlands will be approximately 40m long by 40m wide. They will be lined with an impermeable plastic liner to keep out groundwater and contain treated effluent."*[90]

314. Ms Lough for GWRC note *"The assessment provided in the application suggests that the modelled nutrient load in the groundwater at the land application site is likely to be similar to or less than the current land use when assuming an application rate of 5 mm/day. The same conclusion is reached when assessing a higher application rate of 12 mm/day. Given this, I consider potential nutrient impacts to be less than minor."*[91]

315. There was general agreement between the experts on the effects on groundwater as a result of the proposal.

Submissions

316. Submissions from Mr Alexandrov, Mr Lucock, Ms Bleakley, Ms Reed, Mr Freeth, Mr Geange, Ms Connell, Ms Leahy, and Rangitane o Wairarapa raised concerns around the

[90] Statement of evidence of Ian Ho (wastewater engineering) on behalf of the Applicant, dated 4 July 2025, para 71

[91] Technical assessment of Hilary Kay Lough on behalf of GWRC, Technical Director - Water Resource, dated 29 May 2025, para 28(VII)

potential contamination of groundwater.

Findings of the Panel (groundwater effects from irrigation)

317. Given the agreement between the experts we adopt their findings in relation to potential effects on groundwater as a result of the discharge of treated wastewater to land. We conclude that these effects will be managed by deficit irrigation being used in the application of wastewater to the land area, the removal of stock grazing from the application area, and the proposed groundwater monitoring including an upgradient location of the irrigation area.

10.5 Heavy Metals in Soils

The Experts

318. Experts acting for the Applicant and GWRC who provided us with evidence about land irrigation and the potential for heavy metals to accumulate in soils were:

- Mr Kirk (Environmental Effects) for the Applicant
- Mr Hunt (Environmental Engineer) for GWRC
- Ms Lough (Groundwater) for GWRC

Expert Evidence

319. The AEE and supporting documents outlined how the Applicant proposes to implement irrigation of land with the discharge from the Featherston FWWTP. The application stated that there was little in the way of industrial discharges to the FWWTP, with one known discharge (sawmill) to the network however, there was no information available on the volume or makeup of the contaminates within the discharge to the FWWTP.

320. The Panel notes that the primary evidence of Mr Kirk and Mr Ho remained largely silent in relation to the heavy metal soil monitoring proposed within the irrigation area. In addition, the primary evidence of Ms Anderson for the Applicant included the proposed conditions for monitoring of heavy metals within the irrigation area. However, during questioning of Mr Kirk at the hearing his responses indicated that monitoring of heavy metals in the irrigation area was not likely to be required.

321. Mr Hunt for GWRC in his EIC noted that an additional condition should be included in the consent to cover sampling of heavy metals in the land disposal area including a baseline sample completed prior to irrigation commencing and subsequently every 5 years after[92]. Mr Hunt did however, note is his evidence that there are limited industrial discharges in Featherston and that reduced the likelihood of high concentrations of heavy metals which may not be removed in the FWWTP and could contaminant soils[93]. Mr Hunt reconfirmed in

[92] Technical assessment of Olivier Hunt on behalf of GWRC, Senior Environmental Engineer, dated 30 May 2025, para 32 (IX)

[93] Technical assessment of Olivier Hunt on behalf of GWRC, Senior Environmental Engineer, dated 30 May 2025, para 26 (c)

his summary statement of evidence[94] and presentation to the Panel that this monitoring was still required.

322. The need for monitoring for heavy metals within the irrigation area was an area of disagreement between the experts during the final conferencing on consent conditions. The legal closing submissions for SWDC outlined the reasoning behind why they believed that soil monitoring for heavy metals under the irrigation area was not required[95].

Submissions

323. Although a number of submitters questioned the suitability of the proposed land irrigation area and contamination of groundwater none of the submitters specifically raised concerns around heavy metals within the irrigation area.

Findings of the Panel (Heavy Metals in Soil)

Finding – Heavy metals in soils

324. The Panel's consideration of the effects of the proposed irrigation and the ability for heavy metals to accumulate within the irrigation area was informed by the information provided by the Applicant's and GWRC experts.

325. As there was a difference of opinion between the experts as to whether monitoring of heavy metals was required within the irrigation area the Panel has needed to turn its mind as to whether conditions of consent are required for this monitoring.

326. For the reasons outlined below the Panel does not believe that the imposition of such conditions are warranted:

1) Monitoring is to be undertaken within the discharge itself prior to either irrigation and/or discharge to water. This monitoring will enable the monitoring of the presence of heavy metals within the discharge;
2) Both experts agree that the risk from the discharge to land and heavy metal presence is low; and
3) For the reasons outlined in the Closing Legal Submissions on behalf of SWDC at paragraphs 24 – 33.

327. On this basis the Panel has removed clauses (c) and (d) from Condition DL15.

Finding – Conditions

328. The Panel finds that the consent conditions related to monitoring of soils are generally appropriate however, have concluded that the conditions specific to monitoring of heavy metals within soils in the irrigation area is not required for the reasons outlined above. We

[94] Summary statement of Olivier Russell Marks Hunt on behalf of GWRC (Senior Environmental Engineer) dated 23 July 2025, para 27

[95] Closing legal submission on behalf of SWDC, dated 13 August 2025, paras 24 - 33

have therefore modified condition DL15 and removed clauses (c) and (d) which required the heavy metal monitoring.

329. As noted above the Panel has not included clauses (c) and (d) of Condition DL15 in the final set of conditions. Condition DL15 therefore reads as:

Following commissioning of Stage 5, the Consent Holder shall:

Continuously measure and maintain records of soil moisture in the land application areas as specified in Schedule 2 and shown in Figure 1 of Schedule 2.

Undertake annual sampling of soils to which treated wastewater is applied at a distribution of one shallow sample per hectare of land application area. Samples shall be analysed for the parameters set out in Schedule 1.

10.6 Natural Inland wetlands

The Experts

330. The experts acting for the Applicant and GWRC provided us with evidence about natural inland wetlands effects and management. These experts were:

- Mr Kusabs (Ecology) for the Applicant
- Mr Bellingham (Wetland Ecology) for GWRC
- Ms Nicki Papworth (Wetland Ecology) for GWRC

Expert Evidence

331. The AEE and supporting documents outlined the assessments undertake to identify areas within the project footprint that would be considered wetland habitat[96]. The AEE outlines that on 25 August 2022 a survey was undertaken to identify and describe the vegetation communities and habitats which were deemed potentially natural inland wetland(s) within a 100 m buffer of the proposed land application areas. Due to Donalds Creek breaching its bank and flowing across paddocks further survey work was competed on the 13 April 2023[97]. For defining wetlands the assessment in the AEE *"assumed that despite there now being a difference in the pasture exception details between the PNRP and NPS FM that all 'natural inland wetlands' as per the NPS-FM (see below) are also 'natural wetlands' as per the PNRP."*[98]

[96] Featherston WWTP upgrades Ecological impact assessment – FINAL Prepared for South Wairarapa District Council, dated 1 May 2023

[97] Featherston WWTP upgrades Ecological impact assessment – FINAL Prepared for South Wairarapa District Council, dated 1 May 2023, section 2.2.1

[98] Featherston WWTP upgrades Ecological impact assessment – FINAL Prepared for South Wairarapa District Council, dated 1 May 2023, section 2.2.1.1

332. The report concludes that the natural inland wetland features identified are considered Not Significant[99]. In relation to natural inland wetlands and the report recommended:

- The direct avoidance of Natural inland wetland habitats;
- Sediment, erosion and contaminant controls; and
- Natural inland wetland habitat monitoring through construction.

333. The evidence of Mr Kusabs covers the effects of the proposal on terrestrial and wetland ecology[100]. Within his evidence Mr Kusabs agreed with Mr Bellingham's conclusion that *"the overall effect of this activity on wetland ecology is less than minor."*[101]

334. Mr Bellingham and Ms Papworth provided evidence on behalf of GWRC. Mr Bellingham concluded that:

> *I have reviewed the conditions proposed by the applications. Overall, I consider that these conditions, subject to the additions descried above, will appropriately address the effects on wetland ecology.*

335. Ms Papworth in her evidence concluded:

> *I have reviewed the conditions recommended by the GWRC in the s.42A report. Overall, I consider that these conditions will appropriately address the effects on wetland ecology.*

336. The set of conditions presented at the start of the hearing had proposed the installation of a piezometer. The Panel questioned the requirement for this monitoring given the evidence in front of the Panel from the experts that showed that wetland 1 was not hydrologically connected to the land irrigation area. We note that in the latest set of conditions received that this monitoring requirement has been removed and its removal has been agreed between the experts.

Submissions

337. None of the submissions specifically refer to the Natural Inland Wetlands within the proposed irrigation area.

Findings of the Panel (natural inland wetlands)

Finding – Natural Inland Wetlands

338. The Panel has considered the information in front of it noting the agreement between the experts in relation to matters regarding Natural Inland Wetlands. Given this agreement we

---

[99] Featherston WWTP upgrades Ecological impact assessment – FINAL Prepared for South Wairarapa District Council, dated 1 May 2023, section 5.3

[100] Statement of evidence of Antony Kusabs (Terrestrial ecology and wetlands) on behalf of the Applicant, dated 4 July 2025

[101] Statement of evidence of Antony Kusabs (Terrestrial ecology and wetland) on behalf of the Applicant, dated 4 July 2025, para 160

find that the effects on Natural Inland Wetland subject to the conditions agreed to by the experts will be less than minor.

Finding – Conditions

339. Given the agreement reached on the conditions related to Natural Inland Wetlands we adopt the conditions agreed between the parties and adopt them in full.

Air Discharge Consent

11. Air Discharge Effects

11.1 Overview

340. The air discharge consent application notes that ambient air quality is high, reflecting the site's exposure to regular winds and the limited number of contaminant sources.

341. As noted earlier-2131531312.102 above, the existing air discharge consent has only one condition (condition 26), being that there must be no discharges to air, at or beyond the boundary, that are noxious, dangerous offensive or objectionable.

342. We have been presented with no evidence to suggest that, under current operation, the odour received at or beyond the boundary is unacceptable. During our site visit (on a calm day, in low temperatures) we stood beside the wastewater ponds and also walked the 200 metre length of the treated wastewater channel, from the treatment plant building to the discharge into Donalds Creek. We experienced no significant odour.

Benefits and Positive Effects

343. We were advised within the AEE that the benefits of the site, project, and consenting the discharge to air include:

1) Offsite odours associated with normal day-to-day operations at the FWWTP are unlikely to cause odour which is considered offensive or objectionable.
2) With effective management and maintenance, the intensity of odour emitted from the FWWTP is generally likely to be low and maintained to within 100 m of the source.
3) There is a relatively low frequency of calm/low wind conditions when odour can be exacerbated. Those conditions would have to coincide with abnormal operational events for there to be an effect, and the probability of this occurring is therefore low.
4) Sensitive receptors (dwellings) are well separated from the site, and there is a low frequency of low-speed winds towards receptors.
5) Only treated wastewater will be irrigated to land. It has a lesser odour intensity than untreated wastewater associated with the Site (oxidation ponds).
6) Irrigation will be via surface or sub surface drip irrigation, and not allowed to become stagnant or pool, so the risk and intensity of odour will be low.

The Treatment Plant

344. Each of the Plant elements / processes has a degree of potential odour associated with it. The Application described the odour as being mostly localised in nature.

345. The existing and proposed Plant elements or processes that could contribute to odour, include:

- Existing oxidation ponds
- Existing inlet screening
- Proposed wastewater clarification, sludge dewatering, sludge storage and handling
- Proposed treated wastewater irrigation to land
- Existing / proposed overland discharge of treated wastewater to Donalds Creek

346. Between the time of lodging the application and the hearing, the Applicant confirmed that a dissolved air flotation system (DAF) has been selected as the preferred option for removal of suspended solids in the water exiting the oxidation ponds. As described in the Applicant's closing legal submissions, the DAF system is critical to the delivery of a step change in the treated wastewater quality being discharged .

347. The removal of suspended solids via the DAF process will generate a sludge that then needs to be disposed of. There are different means of doing that, including offsite disposal or use of a geobag system for onsite storage. The Concept Design Report[102], lodged as part of the consent application, addresses these options in its section 9.6. Offsite disposal is addressed in some detail, whereas onsite storage is described as "less preferred" due to potential issues with high groundwater and odour control.

348. We heard that the approach to managing the sludge is to be finalised at the detailed design phase, which will naturally include matters in relation to managing any odour related risks. During the hearing, Mr Ho described offsite disposal as the default option.

11.2 Expert Evidence and Submitter Experience

The Experts

349. Experts acting for the Applicant and GWRC who provided us with evidence about odour generation, effects and management were:

- Ian Ho (wastewater engineering) for the Applicant
- Peter Stacey (air quality) for the Applicant
- Deborah Ryan (air quality) for GWRC

Expert Conferencing

350. Through the joint witness conferencing process, GWRC and SWDC agreed sludge and odour management conditions that they consider provide an appropriate framework to manage any potential odour effects.

351. The air quality experts for the Applicant (Peter Stacey) and for GWRC (Deborah Ryan) did not attend the joint witness conferencing but, as reported in the joint witness statement dated 11 August 2025, both experts reviewed and approved the proposed wording.

352. During the hearing, Ms Ryan for GWRC noted that the air quality conditions had been reduced in scope prior to conferencing and less specific in relation to sludge management

[102] Appendix B of the application

(see para 355 below). She said she accepted that lack of specificity as a necessity, because the sludge management solution is undefined.

Applicant Evidence

DAF sludge

353. Mr Ho's evidence outlined the benefits of Dissolved Air Flotation (DAF), and how it creates a sludge that either needs to be removed from or stored on site. Other than a brief reference in relation to conditions, his written evidence did not address odour.

354. However, in answer to questions, Mr Ho outlined two options for the disposal of DAF sludge. One, is the use of a mechanical press depositing sludge into a temporary storage tank – holding the sludge for no more than 2 to 3 days before transport off site. The other option is the use of geobags and permanent storage on site. Mr Ho noted that the geobag option will not provide a solution for the final disposal of the dried[103] sludge, and that around 5,000 m^2 of the site will be needed to store geobags containing the expected volume of sludge generated over the 10 year life of the consent. He noted that an advantage of an onsite management system for DAF sludge is that it would also be used for pond sludge, although we understand that handling of pond sludge may require a further application for resource consent.

355. With regard to conditions, Mr Ho's evidence (dated 4 July, which pre-dates the joint witness statement of 11 August) addressed an earlier version[104] of the proposed conditions. In that version, condition AQ5 required the Applicant to develop a sludge management regime that would ensure sludge storage tank retention time is short and that removal of sludge is frequent. In Mr Ho's evidence he refers to condition AQ5 as duplicating or overlapping the requirements of condition AQ2.

356. Condition AQ5 was subsequently deleted by agreement between the Applicant and GWRC. If retained, it would have directly addressed a concern that Ms Ryan raised in her Technical Review of air quality issues (see para 368 below). In Mr Ho's opinion, the intent of condition AQ5 had been sufficiently covered by AQ2(a)(v) and AQ2(g) – which he considered will allow the Applicant to develop a set of robust procedures to manage and mitigate sludge related odour emission[105].

357. In answer to questions, Mr Stacey for the Applicant contrasted the levels of certainty regarding odour from temporary storage and transfer off site, versus the use of geobags. He also noted that DAF sludge has a quite distinct smell, and a higher level of odour potential, than that from pond desludging.

358. For offsite disposal, he considered the process of temporary storage in a sealed bin / tank to be very well controlled and understood with respect to odour risk. In contrast, in both his evidence and in answer to questions, he noted some uncertainty about the level of

[103] Dried through being stored in geobags for a length of time

[104] Appendix "HA2"

[105] Para 165, EIC of Ian Ho, 4 July 2025

odour from DAF sludge[106]. To counter unknown levels of effect, he foresaw a trial period. Under questioning, Mr Stacey outlined various mitigation responses that could be instigated if odour appeared to be an issue, such as adding chemicals to promote dewatering, using smaller bags that dry faster, controlling leachate, and odour neutralising sprays.

359. Under questioning, Mr Ho also noted that the geobags would need to be stored within a 5,000 m^2 concreted and bunded area, from which the draining water would need to be pumped back into the wastewater process.

360. The Applicant's closing submissions referred to this as *"at the start of sludge collection in geobags a more intensive short-term odour monitoring programme should be implemented (which would taper off as the risk of issues diminishes and can be monitored less intensively)"*[107].

361. Although Mr Stacey agreed that this trial period would be necessary, in answer to questioning he also said he was "highly confident" that nuisance odours would not eventuate. In part, he based his opinion on the high level of separation between the treatment plant and the nearest sensitive receptors, plus the local wind conditions which generally provide for good odour dispersion.

362. The Panel asked whether the Applicant was aware of any issues with geobags at other wastewater treatment plants. We understand that information about geobag use has been received from Tararua District Council (TDC) about the Dannevirke and Pahiatua wastewater treatment plants. The Applicant's closing legal submissions state that TDC has confirmed that localised odour can occasionally occur around the geobag area due to leachate accumulation, but no odour complaints have been logged. That statement differs from Mr Stacey's response under questioning, which is that five odour complaints have been received at Dannevirke, although not all of them seemed to relate to the wastewater treatment facility.

363. Mr Ho told us in answer to questioning, that the geobags will be placed in a sloped, bunded area, with leachate draining into a pump station for return to the oxidation ponds (such that it will not accumulate and become stagnant). This aspect was also noted in the Applicant's closing legal submissions[108].

Wastewater to land

364. With regard to discharge of the treated wastewater to land, Mr Stacey's evidence referred to both the constructed wetlands, and the vegetated discharge zones (the irrigated discharge area). He stated that the proposed use of subsurface wetlands and vegetated

[106] Para 9, EIC of Peter Stacey

[107] Para 57, SWDC closing legal submissions

[108] Para 58, SWDC closing legal submissions

discharge zones present a low risk of odour, as these systems avoid exposed wastewater surfaces and promote aerobic conditions within the treatment bed[109].

365. During the hearing, Mr Stacey noted Ms Ryan's recommendation that the Air Management Plan (AMP) should include procedures to ensure wastewater is not left sitting in the irrigation lines (with additional detail being covered by the AMP). The final proposed conditions provided in the Applicants closing submissions set a limit to the size and residence time of any ponding resulting from irrigation. We note that although the intention of this condition is to limit the risk of any direct inflow to Donalds Creek, it would also limit the risk of odour (which is already low).

Council Evidence

366. The officer's Section 42A report advised us that:

- Discharge to air from the Featherston wastewater treatment plant is a discretionary activity because the processes are not enclosed
- There are no national environmental standards for odour
- Overall, subject to suitable conditions, the proposed discharge to air (odour) is consistent with relevant objectives and policies of the NRP

367. GWRC's expert air quality evidence was provided by Ms Deborah Ryan, a Technical Director of Pattle Delamore Partners (PDP). She has longstanding experience of discharge to air management, including in relation to sludge disposal from wastewater facilities. Mr Oliver Hunt (also from PDP), who is not an odour expert, referred to the sludge management aspect of the proposal, in his expert role of providing GWRC with an overview of the entire wastewater treatment facility.

368. In her initial Technical Review for GWRC, Ms Ryan noted that wastewater sludge handling and storage processes have significant potential to be odorous if they become anaerobic[110]. She also noted that, in larger treatment plants, these processes are typically enclosed and extracted to control odour. Given that the DAF sludge management at Featherston would not be enclosed, Ms Ryan therefore expressed some concern about the potential for odour generation. She recommended short retention times in the sludge storage tank as a means of minimising the risk of adverse odour effects. She also recommended that the sludge dewatering and storage processes should be designed to enable retrofitting of air extraction capability, to control odour if required[111].

369. In answer to questions at the hearing, Ms Ryan expressed uncertainty about whether the DAF sludge would become anaerobic and generate a more significant odour source than is acceptable. Referencing the various potential mitigation measures for odour control outlined by Mr Stacey, she described the onsite geobag option as something of a "test case". Consistent with Mr Stacey's opinion, she considered that offsite transport of DAF

[109] Para 77, EIC of Peter Stacey, 4 July 2025

[110] Para 20, Technical Assessment of Deborah Ryan – Air Quality, 30 May 2025

[111] Para 21, Deborah Ryan

sludge would generally not face odour issues. However, she also noted that minimising odour risk would depend on the practices adopted for covering the sludge loads on trucks. She agreed that a management plan would be appropriate for dealing with unknown odour risks of dewatering and geobag sludge storage on site.

370. Ms Ryan confirmed that the FIDOL factors (Frequency, Intensity, Duration, Offensiveness, and Location) used to assess odour can be objectively assessed by suitably qualified experts. Such assessments can determined if a breach has occurred in terms of condition AQ1, and when a response should be triggered.

371. Mr Hunt's initial Technical Review concluded that the DAF trial results provide a high level of certainty on the performance of the DAF which, as he noted, is the upgrade with the largest beneficial impact on wastewater effluent quality[112]. It is also a significant source of sludge through removal of suspended solids from the wastewater flow. In the hearing, Mr Hunt said he was unaware of any issues with geobags in relation to dealing with pond sludge (which is not part of the consent application), but that he had no experience relevant to odour generated by DAF sludge stored in geobags. He therefore deferred to the odour experts on that aspect. However, he raised the possibility of returning DAF sludge to the ponds temporarily, while alternatives were sought, if using the geobag option proved to create odour management issues.

372. Ms Ryan also considered the risks were low (mentioning the location of the Pahiatua facility). Ms Ryan agreed with Mr Stacey that if odour problems associated with the use of geobags on site persist, then the sludge could be trucked offsite for disposal. Both Mr Stacey and Ms Ryan stated that this would avoid the odour issue so long as it is managed appropriately.

Submitter Experience

373. Concerns about odour were expressed in a number of submissions including those of Health NZ, Erin Geange, Neal Goodall, Julia Reed, Dianne Connell, and Rangitāne o Wairarapa. Some of the submitters who spoke at the hearing also referred to odour. A number of submitters also criticised the meteorological information referred to in the AEE and by the Applicant's expert – querying why local (instead of Martinborough) data had not been used.

374. During the hearing, Margeurite Tait-Jamieson referred to 'human waste being put in a skip with a tarpaulin over until it's decided what to do with it'. She queried how odour would be dealt with during offsite transport of sludge. She considered that offsite disposal is unsophisticated solution. In their presentation to the hearing, Garrick Emms and Warren Woodgyer said that the AEE failed to properly identify odour impact.

375. Dr Mackenzie from Health NZ noted that odour is a complex issue to manage. She said that there enough information to prepare an Air Management Plan, but in doing so it would be important to ensure that odour mitigation measures had been well considered and were available to be implemented. The submission of Health NZ recommends the continuation

[112] Para 31, Technical Assessment of Oliver Hunt – Assessment of Treatment and Land Disposal, 30 May 2025

of a complaints register and response to support identification and mitigation of any potential issues with odour with the proposed changes. Health NZ also recommends inclusion of a section in the report assessing public health impacts and potential future public health risks, and sought the opportunity to be included in the consultation around impacts on public health.

Panel Findings on Air Discharge Conditions

376. The final set of conditions provided to us in the Applicant's closing legal submissions included several markups to the AQ (Air Quality) conditions that had previously been agreed between GWRC and the Applicant via the joint witness statement process.

377. There was general agreement between the air quality experts (Stacey and Ryan) that, under normal operations – and subject to appropriate management – the expected level of odour from the treatment plant will be low. Both experts qualified that opinion by acknowledging that the onsite geobag sludge management option has a higher odour risk than temporary storage onsite followed by offsite transport and disposal. We accept their shared opinions on both matters.

378. We note here our acceptance of the meteorological data used by the Applicant. Although sources of data closer to the FWWTP could have been used, it seems that that Applicant had not been aware of them. However, in using Martinborough data, the assessment has been more conservative due to the higher frequency of low speed wind days at that location. Low speed wind days bring with them a greater risk of odour effects being more noticeable.

Finding – DAF Sludge Disposal

379. If geobags are used for onsite storage of sludge, we consider that the required area of 5,000 m^2 (over the 10 year life of the consent) will be readily found within the extensive area land owned and designated by SWDC for use associated with the wastewater treatment plant. The required area equates to about 70 metres x 70 metres. In that respect, the use of geobags for sludge storage seems a feasible option.

380. In the absence of specific national or regional standards relevant to odour, we find that the proposed development of an Air Management Plan (AMP), containing an odour management protocol, is appropriate in principle.

381. With respect to the AMP, the conditions we have imposed require it to include protocols and procedure that addresses a range of potential matters relevant to air quality management.

382. As signalled in the hearing, we had some concerns about how management of odour effects has been 'pushed down' to the Air Management Plan (AMP). We queried whether that was a suitable approach, given that we received little evidence to quantify the potential effects from one of the DAF management options. The Applicant's legal counsel stated that we could rely on condition AQ1, which is that "there shall be no noxious, dangerous, offensive or objectionable odour to the extent that it causes an adverse effect at or beyond the boundary of the site".

383. We appreciate that condition AQ1 is a typical approach, and that it provides a necessary backstop. However, we consider it should be more strongly backed by the odour management protocols and procedures detailed condition AQ2. Regarding that condition, we favour greater clarity about potential odour management issues that need to be considered. We disagree with Ms Ryan's reasoning for accepting condition AQ2 as ultimately proposed by the Applicant (see para 356). She considered that AQ2 cannot be more specific because the DAF sludge management option has not yet been chosen or developed in detail. With respect, we think that is why greater detail is needed in AQ2.

384. We have reached that conclusion for several reasons:

1) As acknowledged by the experts, sludge from the DAF process is anticipated to have greater odour potential than other processes in the wastewater treatment plant. It is different in that respect from the odour associated with pond sludge.

2) The Applicant's written expert evidence, verbal replies, and closing statement stated various actions or mitigations that would or could be taken if onsite disposal of DAF sludge was the chosen option. Although they can be considered "in scope" (because the Concept Design Report referred to the potential for onsite disposal), none of those actions or mitigations were part of the actual application.

3) Although condition AQ1 is a useful backstop, its importance is greatest after a breach has occurred. We prefer that the consent holder and community know effort is clearly required at an earlier stage (development of the AMP under condition AQ2) to consider how to avoid AQ1 coming into play.

Finding – Odour from Discharge to Land

385. Only treated wastewater will be discharged to land. It will have been screened, spent time in the oxidation ponds, subjected to the DAF process (removing much of the suspended solids), and passed through the treatment plant UV system. We are confident that the wastewater will present a low odour risk at that point.

386. In addition, the wastewater will not be sprayed as part of the discharged to land process. It will be dispersed onto planted mounds by a controlled trickle irrigation process at times of the year, and a rate, that limit the risk of surface ponding. The irrigation lines will also be flushed to avoid odour issues. Conditions have been imposed in relation all of these matters.

387. We therefore find that there is little risk of objectional odour being experienced beyond the boundaries of the site, arising from the proposed discharge to land. Odour will be frequently monitored, and the Air Management Plan will include processes for responding to non-compliance with condition AQ1.

Finding – Conditions

388. The Panel finds that the Air Discharge consent conditions are generally appropriate, in particular, the need for an Air Management Plan. However, we have modified the conditions provided to us in the Applicant's closing statement for reasons outlined in this section of our decision.

389. Our final wording of the Air Quality conditions has added to or clarified several matters, including:

1) That a suitably qualified and experienced person (SQEP) should be responsible for determining if odour is noxious, dangerous, offensive or objectionable beyond the boundary of the site (condition AQ1).

2) Rewording of condition AQ2 to more clearly distinguish between an odour management protocol (framework), and procedures / measures (more specific actions).

3) Adding procedures and measures that should be considered in relation DAF and pond sludge handling, whether or not it is onsite or offsite disposal. These procedures and measures were referred to in written or verbal evidence from the Applicant and GWRC experts, but not detailed in the application documents.

390. Parts of AQ conditions have also been revised to be more consistent with wording in other management plan conditions.

Statutory Matters

12. Section 104(1)(b) Consideration of Statutory Instruments

392. We accept that relevant provisions from the following statutory instruments have been appropriately identified by the planning experts. We have had regard to these in reaching our decisions. The Application (pages 63-76) sets out the relevant policies and plans to this activity. Ms Helene Anderson also provides a useful assessment (section 10) in her 42A Report.

12.1 National Policy Statements

393. We agree that the objectives and policies mentioned in the application and in evidence are relevant to the application. Overall, we concur with the assessments provided by the Applicant and GWRC's planning experts, taking into account the discussion below.

National Policy Statement for Freshwater Management

394. The Applicant[113] considers the proposal is consistent with the policies of the NPS-FM and it gives effect to Te Mana o te Wai through the proposed upgrades. The Applicant also notes other relevant provisions including long term visions for freshwater.

395. In her planning evidence, Helen Anderson for the Applicant considers that the proposal restores the balance between freshwater values, cultural and spiritual values and community expectations.[114]

National Policy Statement on Urban Development

396. The Applicant notes that the primary purpose of the activity is to continue to service the Featherston urban environment. Helene Anderson for GWRC also notes that the policies of the NPS-UD largely relate to increasing the capacity for housing and are not directly related to this application[115].

Finding

397. The Panel notes the general alignment between the planning experts in relation to National Policy Statement direction. The Panel agrees with both the Applicant and the reporting officer that the Policy Statements above are relevant to this proposal. The Panel

[113] Assessment of Effects 11.2.1, page 149

[114] Evidence of Helen Anderson, para 138

[115] Section 42A report, para 406

therefore considers that, to the extent that any of the national direction is applicable, the proposed activity is consistent with that direction.

398. Although the discharge is of treated wastewater, we acknowledge that it is still considered to be repugnant to iwi as described in their CIAs. That said, we consider that the suite of conditions provides for significant ongoing input from iwi if they want to take up that opportunity. In particular, conditions G5 (community liaison group), G7 to G9 (preparation of management plans), G23 (future directions report), and DW19 (notification and investigation) actively provide for the involvement in managing the adverse effects of the wastewater discharge. We consider that this gives effect to Te Mana o te Wai.

12.2 National Environmental Standard – Freshwater

399. In her evidence, Helen Anderson for the Applicant provides a useful summary of the application on the NES[116].

400. She notes that because the FWWTP is regionally significant infrastructure, it meets the definition of specified infrastructure under the NPS-FM, and as such provides a consenting pathway. In the s.42A report, Helene Anderson for GWRC considers the NES-F to be applicable to the application.

401. The Panel agrees with these assessments and considers the application is consistent with the relevant National Environment Standards.

12.3 Wellington Regional Policy Statement

402. Section 12.2.1 of the Section 42A report provides a thorough assessment of the proposed activities against the RPS provisions. Ms Anderson's assessment was grouped into themes based on what were considered the relevant objectives and policies of the RPS. These included:

- Water quality and aquatic ecosystem health (O12, O13 and P40)
- Indigenous ecosystems (O16, O16B and P47)
- Regionally significant infrastructure (O10 and P39)
- Te Tiriti o Waitangi and matters of significance to tangata whenua (O 23, O24, O25, O26, O27, O28 and P48)
- Recreation (O8 and P35)
- Air discharge (O1)

403. Overall, the Applicant and the s.42A report writer are in general agreement.

404. The Applicant notes that although concern regarding consultation was raised by the iwi, the Applicant did engage early and is committed to continue to engage as part of the design and implementation.

[116] Evidence of Helen Anderson for the Applicant, paras 155-163

Finding

405. The Panel notes the concerns raised by iwi regarding consultation and engagement. However, the Panel considers that the proposed activity is consistent with the requirements set out in the RPS.

12.4 NRP Objectives and Policies

406. The Applicant provides a thorough assessment of the proposed activities against the NRP in Appendix H of the application. The key provisions of the NRP are comprehensively detailed in para 12.2.2 of the GWRC s.42A report, and of relevance to this Application relate to:

- Ki Uta ki tai (O1, O2, O4 and P1, P3)
- Beneficial use and development, regionally significant infrastructure (O9, O10, O11 and P6, P9)
- Māori relationships and sites of significance to Mana Whenua (O3, O12, O13 and P18, P19, P20, P21)
- Water quality (O17, O18,O19 & P31, P80)
- Biodiversity, aquatic ecosystem health and mahinga kai (O19, O22, O23, O24 and P30, P31, P32, P35)
- Sites of significance values (O25 and P37)
- Wastewater (O36, O39, O40 and P90, P91, P93, P96)
- Air quality (O31, O32 and P58)

407. We note discussion in evidence and at the hearing regarding consistency with NRP Objective O19, which relates to periphyton biomass in Donalds Creek downstream of the FWWTP discharge point. The planning experts for both the Applicant and GWRC agreed that the periphyton monitoring that has been undertaken to date does not allow for an assessment against Objective 19 to be completed. Ms Anderson for the Applicant considered that once the upgrades are implemented, consistency with O19 will be achieved.[117]

408. However, it became clear to us that there is insufficient information available to draw sound conclusions about Objective O19's periphyton attribute. Greater certainty will be possible once targeted monitoring is in place, and that is a reason the conditions require two 3-year periods of periphyton monitoring.

Finding

409. Notwithstanding the identified inconsistencies with some objectives and policies, both the Applicant and the s.42A report writer are in general agreement and draw the conclusion that the consents can be granted. We note in particular the opinion of Ms Anderson for GWRC that although the proposal is not consistent with some policy provisions:

[117] Evidence of Helen Anderson for the Applicant, para 198

> *… this application does move the treatment plant discharges towards the objectives and policies set out in Objective O39, which promotes discharges to land over fresh water, Objective O40, which directs that discharges of wastewater to fresh water are progressively reduced, and P92 which requires that the adverse effects of existing wastewater discharges to fresh water are minimised.*[118]

410. On that basis she considers that all necessary consent can be granted, and we are in agreement with her on that matter.

12.5 Section 104(1)(c) Consideration of Other Matters

411. Sections 10.1 and 12.3 of Ms Anderson's s.42A report noted that the Ruamāhanga Whaitua Implementation Plan (WIP), dated August 2018, is a relevant matter under s104 (1)(c) of the RMA.

412. The Ruamahanga WIP sets out the recommendations of the Whaitua Committee after a consultative process in response to the National Policy for Freshwater Management (NPSFM). Ms Anderson acknowledges that there are two key recommendations from the WIP (Recommendations 55 and 57) which are particularly relevant to this application. Recommendation 55 requires GWRC to include a rule in the NRP for wastewater discharges to meet the target allocations for nutrients.

413. Recommendation 57 requires GWRC to work with territorial authorities to ensure that wastewater is discharged appropriately to land by 2040, recognising that direct discharges to water may occasionally be acceptable but only in exceptional circumstances and only at high flows (three times the median flow).

414. The Panel notes that although the proposal does not include a full discharge to land, it involves a trial of irrigating to land with treated wastewater from the FWWTP. This trial will enable the long-term solution for the FWWTP to be developed with the information collected from the trial.

12.6 Section 104(2A) – Value of Investment

415. Section 104(2A) of the Act requires us to consider the value of the existing investment in the existing wastewater Treatment Plant. This section comes into play via section 124 of the Act, as the application relates to the exercise of an existing resource consent while applying for a new consent. Section 104(2A) states that:

> *When considering an application affected by section 124 or 165ZH(1)(c), the consent authority must have regard to the value of the investment of the existing consent holder.*

416. In section 11.7 of the application, the Applicant notes:

> *The Featherston WWTP represents a significant investment by SWDC, and the proposed upgrades also represent further significant investment for the Council,*

[118] Section 42A report, para 517

therefore section 104(2A) is therefore a relevant consideration when considering this application.

417. The value (positive benefit) of the Treatment Plant in a public health sense is addressed elsewhere in our decision.

12.7 Section 104B – Discretionary Activity

418. Each of the discharge consents are deemed to be Discretionary Activities under the NRP.

419. Section 104B of the RMA sets out the matters we must have regard to in considering the Application. For completeness, the components of this provision are as follows:

104B Determination of applications for discretionary or non-complying activities:

After considering an application for a resource consent for a discretionary activity or non-complying activity, a consent authority—

(a) may grant or refuse the application; and

(b) if it grants the application, may impose conditions under section 108.

12.8 Sections 105 and 107 – Discharge

420. With regard to discharges, the Act requires us to consider certain matters. These are set out by sections 105 and 107.

105 Matters relevant to certain applications

(1) If an application is for a discharge permit or coastal permit to do something that would contravene section 15 or section 15B, the consent authority must, in addition to the matters in section 104(1), have regard to—

(a) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and

(b) the Applicant's reasons for the proposed choice; and

(c) any possible alternative methods of discharge, including discharge into any other receiving environment.

(2) If an application is for a resource consent for a reclamation, the consent authority must, in addition to the matters in section 104(1), consider whether an esplanade reserve or esplanade strip is appropriate and, if so, impose a condition under section 108(2)(g) on the resource consent.

107 Restriction on grant of certain discharge permits

(1) Except as provided in subsection (2), a consent authority shall not grant a discharge permit or a coastal permit to do something that would otherwise contravene section 15 or section 15A allowing—

(a) the discharge of a contaminant or water into water; or

(b) a discharge of a contaminant onto or into land in circumstances which may result in that contaminant (or any other contaminant emanating as a result of natural processes from that contaminant) entering water; or

(ba) the dumping in the coastal marine area from any ship, aircraft, or offshore installation of any waste or other matter that is a contaminant —

if, after reasonable mixing, the contaminant or water discharged (either by itself or in combination with the same, similar, or other contaminants or water), is likely to give rise to all or any of the following effects in the receiving waters:

(c) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials:

(d) any conspicuous change in the colour or visual clarity:

(e) any emission of objectionable odour:

(f) the rendering of fresh water unsuitable for consumption by farm animals:

(g) any significant adverse effects on aquatic life.

(2) A consent authority may grant a discharge permit or a coastal permit to do something that would otherwise contravene section 15 or section 15A that may allow any of the effects described in subsection (1) if it is satisfied—

(a) that exceptional circumstances justify the granting of the permit; or

(b) that the discharge is of a temporary nature; or

(c) that the discharge is associated with necessary maintenance work—

and that it is consistent with the purpose of this Act to do so.

(3) In addition to any other conditions imposed under this Act, a discharge permit or coastal permit may include conditions requiring the holder of the permit to undertake such works in such stages throughout the term of the permit as will ensure that upon the expiry of the permit the holder can meet the requirements of subsection (1) and of any relevant regional rules.

421. Briefly, the discharges are treated wastewater (to both water and land) as described in Section 9.6 of the AEE, and odour. Subject to good management practices under the management plans, the s.42A report concluded that the receiving environment for the air discharges is not very sensitive due to its location which is relatively isolated from residences, and the nature of prevailing winds.

422. The receiving environment of Donalds Creek for the wastewater discharge is sensitive due to its importance to iwi and their historical associations with the area. Downstream, the watercourse ultimately discharges into Wairarapa Moana – which raises further issues of cultural and environmental sensitivity.

423. Dr Ausseil in his Evidence in Chief identified Donalds Creek in its current state as being moderately to highly sensitive to the potential effects of a point source discharge. On questioning as to whether anything Dr Ausseil had heard during the hearing would change this opinion, he confirmed that his opinion remained the same.

424. Mr Garett-Walker was also questioned as to the sensitivity of the receiving environment. Mr Garett-Walker noted that he did not consider the receiving environment as highly sensitive, but did state that sensitivity is situational and seasonal. Mr Garrett-Walker noted that there is some evidence of sensitivity during low flow conditions, although he could not claim the sensitivity of one aspect of the ecosystem over another. The Panel adopts the

opinion of Dr Ausseil for the reasons outlined in paragraph 20 of Dr Ausseil's Evidence in Chief and the responses provided by Dr Ausseil and Mr Garrett-Walker at the hearing.

425. Alternative FWWTP upgrade options were considered by South Wairarapa District Council and Wellington Water, with details provided in Section 7 of the AEE. We note that alternative options included:

- An alternative facility which would treat combined wastewater from Martinborough, Greytown and Featherston, and a second combined scheme including wastewater from Carterton
- 'Do nothing'
- A range of pond enhancement options to improve pond performance
- A range of pond add-on options to supplement the existing treatment system, and
- Pond replacement options
- Land treatment

426. Following a series of workshops, a long and short list process was undertaken. Options were then refined with an assessment against a set of criteria.

427. Overall, the Panel is satisfied that appropriate alternatives were considered, and that the methods used to identify the Best Practicable Options in relation to the discharges were reasonable.

Section 107

428. Section 107 matters are considered in Section 5.5 of the AEE. Briefly the AEE concludes that, for the reasons it provides:

1) The proposed installation of the DAF is expected to ensure that the plant meets the criteria of s107(1).
2) Acknowledging funding constraints and timing of funding availability, the proposal is consistent with s107(2) and the consent can be granted.

429. We considered the matters referenced above to be relevant to our deliberations on s107 matters. We also considered the assessments of technical experts that, overall, indicate adverse effects on aquatic life will not be significant.

430. The s.42A report summarises the issues raised by submitters including:

- Cost
- Pressures of future development and growth
- The discharge is inconsistent with Te Mana o te Wai
- Water quality
- Odour issues from the plant.

431. A term of 10 years is sought for the discharge consent. However, the existing discharge will continue for a period of around two years before the quality of the discharge improves due to the proposed plant upgrades.

432. A question considered by the Panel was whether the two year period between granting of the consent and achieving consistency with section 107, would count as a "temporary"

period under s107(2)b. Mr Allen, legal counsel for the Applicant, assured us that case law supported such an interpretation. Under questioning Mr Allen also noted what he called an "overlap" between the s107 question, and how we should interpret NRP rules R65 and R66. As noted in section 3.3, from paragraph 85, legal advice obtained by GWRC was that if the discharge achieves the reduction in contaminants over the time period applied for, it would meet the intent of those rules.

433. We therefore find that the two year period can be considered temporary and in doing so, we agree with the Applicant's opening legal submissions which summarised the position as being that:

> *Although effects on Donalds Creek are likely to be more than minor for a temporary period, post-upgrades the effects will be no more than minor and the proposed conditions will contribute to a reduction in effects of the discharge.*[119]

Finding on s105 and s107

434. Based on the above considerations, the Panel finds that the requirements of sections 105 and 107 will be met and therefore that the discharge consents can be granted.

13. Part 2 RMA Assessment

13.1 Part 2 Analysis

435. In making a consent decision, Section 104(1) of the RMA requires our consideration to be subject to Part 2 of the Act (being Sections 5 to 8). In their assessment and expert evidence, the Applicant and GWRC planners provided robust analyses of the application against Part 2 of the RMA.

436. RMA Section 6 identifies matters of national importance. Relevant matters to this proposal are summarised at section 12.4.2 in the s.42A report, and include: 6(a), 6(b), 6(c) and 6(e). In her assessment, Ms Anderson for GWRC considers the matters identified in section 6 have been provided for.

437. RMA Section 7 'other matters' have been given particular regard to including:

- Kaitiakitanga and the ethic of stewardship
- The maintenance and enhancement of amenity values
- Intrinsic values of ecosystems
- Maintenance and enhancement of the quality of the environment
- The effects of climate change

438. RMA Section 8 identifies the principles of the Treaty of Waitangi shall be taken into account.

439. The CIA prepared on behalf of the iwi set out their history and associations with the area and the effects of the activity on their cultural values. We agree that historically the

[119] Applicant's opening legal submissions, para 11

relationship of iwi has not been adequately recognised or provided for. However, as noted earlier in this decision, the Panel consider that the current engagement with mana whenua, and the future involvement in design and delivery, is appropriate.

440. Particular regard to the maintenance and enhancement of amenity values of the area will occur through better treatment of the discharge and monitored through consent conditions. The intrinsic values of ecosystems and the maintenance and enhancement of the quality of the environment are key considerations for the FWWTP and the conditions of consent. We acknowledge the effect that climate change can have on rainfall events and the capacity of the Treatment Plant, and the increased frequency or magnitude of heavy rainfall events will need to be appropriately managed over the term of the consent.

441. Overall, the expert planners considered that in relation to Part 2 matters, any relevant effects will be avoided, remedied or mitigated to an acceptable level provided that the consent conditions are adopted.

442. We agree with their conclusions and find that the proposal is consistent with Part 2 of the Act. In particular we consider that Part 5 (Purpose) of the Act will be met, in that granting the consents will allow management of the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety.

Decision and Conditions

14. Decision

443. After having regard to all relevant matters, we find that the purpose of the RMA is best served by GWRC granting the resource consents on terms set by the conditions contained in Attachment 2.

444. Key reasons for our decision include:

3) Featherston FWWTP is regionally significant infrastructure. SWDC has committed its ratepayers to a large investment in the Treatment Plant to achieve performance upgrades. The Plant is critical to the maintenance of public health and providing for growth and development connected to the Featherston sewerage network. The Plant cannot continue operating without discharge consents.

4) The potential for adverse effects associated with treated wastewater discharges to water and land, as well as odour discharge, will be mitigated through comprehensive sets of conditions.

5) We accept the evidence of the Applicant that the FWWTP upgrades will use appropriate technology that results in air and effluent quality complying with consent conditions.

445. Subject to compliance with conditions, our findings on the adverse environmental effects of the discharges to water, land and air are:

- The adverse effects of the wastewater discharges on:
  - public health will be no more than minor
  - stream and lake ecology and water quality will be less than minor
  - groundwater will be less than minor
- The adverse effects of odour will be less than minor

446. We acknowledge the concerns of, and outcomes sought by both iwi. In particular, we recognise the cultural and spiritual abhorrence of discharges into water and the overall preference of mana whenua to move towards discharge to land. The proposal is a first step in that direction. The Panel is satisfied that appropriate alternatives were considered, and that the methods used to identify the Best Practicable Options in relation to the discharges were reasonable.

447. We also acknowledge the concerns of other submitters from the community, and the discomfort of some people with what was referred to as “risky and untested” aspects of the proposal. Again, the Panel is satisfied that the overall outcomes will be an improvement on the current situation. The conditions imposed will directly manage the well-known effects and provide an effective framework for managing lesser known ones.

448. We also find that:

1) We are able to grant consents in accordance with s105 and s107 of the RMA.
2) Matters from Part 2 of the RMA have been taken into account.
3) The proposal is generally consistent with the relevant objectives and policies of the NRP and relevant national direction.

15. Conditions and Duration

15.1 Conditions

449. As noted elsewhere in our decision, the Applicant and GWRC provided us with a proposed set of consent conditions, including refinements agreed to by the various experts on behalf of the parties they represent.

450. The Applicant's closing legal submissions / right of reply[120] provided us with further commentary on conditions, and a marked up copy of the conditions. That copy of the conditions made it clear where condition wording was agreed, and the relatively few points where differences remained between the Applicant and GWRC. Taking that document as a starting point, we have revised some conditions as indicated elsewhere in our decision. The conditions are issued as Attachment 2 to the decision.

451. We note here that an important part of ongoing environmental compliance at the FWWTP is reliant on various management plans. We consider the general management plan process set by conditions G7 to G12 to be robust in that it clearly outlines the roles of the consent holder and GWRC. In particular, each management plan must be prepared by a suitably qualified and experience person (a "SQEP") and certified by GWRC, including methods of sampling and analysis. The consent conditions set out the purpose of the management plans, and detail what they are required to address. Before operating under any of the plans, they must be certified by GWRC as meeting the requirements of the relevant conditions.

452. An equally important aspect of the environmental compliance management system is a "staged management" response that comes into play when monitoring detects that a specified environmental value has been exceeded. Some of our condition changes have been to clarify the working of that staged management process and to ensure consistency of approach to this matter across the management plans.

453. Elsewhere in our decision report we have set out the main amendments and additions made by the Panel, after having regard to:

- The proposed condition suites as provided in the Applicant's written closing statement (showing remaining areas of disagreement with GWRC)
- Matters covered by the Applicant in their written closing statement
- The Panel's own assessment of required / beneficial amendments and additions

[120] Dated 13 August 2025

454. To avoid confusion in the cross referencing between conditions (and with condition references in the legal submissions), we have retained the same condition numbering as per the conditions provided in the Applicant's 13 August closing statement. We appreciate that some minor renumbering of the conditions may be useful. However, we have chosen to leave that matter with the consent authority and the consent holder. To facilitate a possible renumbering, we have added the following sentence to the RMA s128 review conditions of both consents.

> *Nothing in this condition shall prevent the Council from, at any time, renumbering consent conditions to improve clarity and consistency.*

15.2 Duration

455. The maximum duration that can be set for a discharge consent is 35 years. The Applicant, acknowledging that the effectiveness of the discharge to land aspect needs to be monitored and reviewed, has sought a 10-year term.

Submitter opinions about duration

456. With respect to duration, the Panel is in general agreement with the views expressed by the Applicant and GWRC. That is, a term of 10 years is appropriate. We also understand the views of other some submitters who objected to the duration.

457. For example, Mr Hedley in his submission stated that as this is only a trial the term should be much shorter and that 10 years is far too long. Ms Geange had also noted that 10 years was too long for the trial and that a 5-year term would be appropriate for its completion.

458. The conditions and approach had been discussed over an extended period with parties including mana whenua, with a degree of acceptance that the approach and conditions would go some way towards recognising and providing for cultural values – although not avoiding tikanga that human waste should not be discharged to water. That dialogue about the approach to ongoing management and development of the Wastewater Treatment Plant preceded lodgement of the application for resource consent, and its public notification. Both the Applicant and the community support a move away from 'business as usual' and an aspiration for better environmental outcomes.

459. In the circumstances, we find that a duration of 10 years[121] is appropriate. This duration reflects:

1) The considerable work that has been done since 2012 on developing the approach to treatment and discharges.
2) The fact that the discharge to land cannot start until other stages of the treatment plant upgrade have been completed – as set out in condition G14. This means that the first (3.5 ha) area of discharge to land will not start until about 3 years after commencement of the consent. The second discharge area will not start for about 6 years.

[121] Commencing from the date of our decision

460. In effect, the "trial" aspect will, by necessity, be relatively short – lasting 4 to 7 years before the consent must be renewed.

16. Acknowledgements

461. We would like to thank all participants for their constructive engagement in the process. Although the outcomes of our decision and recommendation may not be what some parties sought, we acknowledge the significant effort that they have put into engaging with the process. We acknowledge all individual written submissions and personal appearances from the community which we found valuable in providing additional context for the issues we needed to consider.

462. The careful assessment, investigation and response to individual issues and environmental effects by the Applicant and other parties was appreciated.

463. We would also like to acknowledge the collaborative work of the technical experts and planners involved in this matter. Finally, we gratefully acknowledge the assistance to the Panel provided by the hearing administrators before, during and after the hearing.

Rawiri Faulkner | Mark Ashby (Chair) | Logan Brown

Date: 8 October 2025

Attachment 1 – Submissions

Below is a summary of points contained within each of the twenty nine submissions received. The Panel reviewed the submissions as part of the hearing process and to inform its decision making. These points noted below are only note high level matters raised in the submissions, it is not a comprehensive summary of the submissions .

Pavel Alexandrov – Submission 1

Noted the following concerns:

- Contamination of groundwater
- Health concerns
- No need to fix things that are not broken

A specific request to either grant or decline consent was not recorded.

Lina Goldstein – Submission 2

Noted the following concerns;

- Find better long-term solutions
- Do not release sewage onto surrounding land

A specific request to either grant or decline consent was not recorded.

Joshua Duley – Submission 3

Noted the following:

- Support the proposed cost-effective solution to wastewater management

A specific request to either grant or decline consent was not recorded.

Sally Walker – Submission 4

Noted the following concerns:

- Wouldn't support an operation east of Murphy Line in the future
- Inflow and infiltration to Featherston's sewerage network

Supported grant of consent with conditions.

Jenny Ruff – Submission 5

Noted the following concerns:

- Will take too long, too expensive and not sustainable
- Seeking a long-term solution

Opposed the application.

Aurelie Rey – Submission 6

Noted the following concerns:

- Opposed discharge to water
- This is not a sustainable long-term solution

Opposed the grant of consent.

Sedef Setiner – Submission 7

Noted the following concerns:

- None of the suggested solutions are sustainable long-term solutions

Opposed the grant of consent.

Villads Christiansen– Submission 8

Noted the following concerns:

- Requests investigation into sustainable long-term solutions to sewage treatment

Opposed the grant of consent.

Mark Lucock – Submission 9

Noted the following concerns:

- High water table, and consistently strong winds
- Has a bore and consumes water collected from the roof
- Seeks a better alternative means of treating the wastewater

Opposed the grant of consent.

Neal Goodall – Submission 10

Noted the following concerns:

- Concerned that neighbours to plant will have little agency should they suffer adverse effects, and has a lack of confidence
- Loss of property values
- Odour

Opposed the grant of consent.

Andrew Walker – Submission 11

Noted the following concerns:

- Supports drip of subsurface discharge over previous proposal to spray semi-treated waste. Does not support expansion of the discharge to land, and expansion of the trial until wastewater pipes in Featherston are repaired
- Supports monitoring
- Approval of upgrades and trial proposed in application; no expansion beyond application until trials have been evaluated

Supports the grant of consent, subject to points above.

Marguerite Tait-Jamieson – Submission 12

Noted the following concerns:

- Non-compliance from SWDC
- There is no long-term, sustainable solution
- Discharge is to Donalds Creek and therefore to Wairarapa Moana which is concerning. Considers consent is for a trial with no long-term solution
- Lots of information to read and short timeframes, consultation

Opposed the grant of consent.

Michael Holmes – Submission 13

Noted the following concerns:

- Considers that releasing wastewater to waterways will further pollute water, and discharge to land would be preferred
- Requests discharge to land instead of to water

Opposed the grant of consent.

Claire Bleakley – Submission 14

Noted the following concerns:

- Discharge to land with high water table
- Pollution to underground aquifers and bores
- Wairarapa moana pollution
- Data sources for wind speed, missing data
- Unaffordable
- Inflow and infiltration to Featherston's sewerage network
- Other technology and methods available for treatment
- Effects on ecological values
- Effects on Tangata Whenua

Opposed the grant of consent.

Karen Krogh – Submission 15

Noted the following concerns:

- The application includes inaccurate data and details that are yet to be confirmed
    - Does not consider the application is a well resolved, complete, and rigorous proposition suitable to be submitted as a serous proposal

Opposed the grant of consent.

Julia Reed – Submission 16

Noted the following concerns:

- Inflow and infiltration to Featherston's sewerage network

- Monitoring of water table
- Storage of FWWTP discharge for later use
- Suitability of land for irrigation
- Odour discharge
- Property values
- Plant species to be used
- Requests further information before a decision is made

Neutral position on the grant of consent.

Mark Grinte – Submission 17

Noted the following concerns:

- Cost of the project
- That it is only a short-term solution
- Requests further information before a decision is made

Neutral position on the grant of consent.

Jim Hedley – Submission 18

Noted the following concerns:

- Inflow and infiltration to Featherston's sewerage network
- No detailed design in the application
- Standard that the wastewater must meet before entering Donalds Creek
- Given that the discharge to land is a trial, the timeframe should be shorter

Opposed to the discharge to water.

Martin Freeth – Submission 19

Noted the following concerns:

- Lack of information
- Environmental degradation of Wairarapa Moana
- Cost of the project
- Effects on Donalds Creek
- Timing and volume of discharge between land and water
- Contamination of bores
- Understanding of the hydrology between Featherston township and lake
- Requests further information from SWCD and WW before a decision is made

Neutral position on the grant of consent.

Queen Elizabeth the Second National Trust (QEII) – Submission 20

Noted the following concerns:

- The Otawira Open Space Covenant
- Support the following recommendations, specifically:

a. any stream crossings being outside of the QEII covenant
b. undertaking riparian planting upstream of the QEII covenant
c. avoiding disturbance of the QEII protected area
d. Avoiding mature riparian vegetation installing piping infrastructure
e. Care should be taken to ensure good biosecurity hygiene is used during proposed works

Neutral position on the grant of consent.

Te Whata Ora National Public Health Service (Health NZ) – Submission 21

Noted the following:

- Wellington Water should work with both iwi, including implementing the CIA recommendations, particularly the development of an engagement plan via an MoU as per the Rangitāne o Wairarapa CIA.
- Recommends that appropriate monitoring conditions are imposed to ensure the discharge is not causing microbiological contamination or significant increases in nutrient concentration leaching and adversely impacting on groundwater (immediate and cumulative effects).
- Recommends that the use of subsurface irrigation is the preferred method of discharge to land near property boundaries or surface water.
- Recommends a consent condition is included requiring the access gate on Longwood West Road to remain locked at all times to prevent public access
- Recommends the continuation of a complaints register and response to support identification and mitigation of any potential issues with odour with the proposed changes.
- Recommends inclusion of a section in the Future Directions Report assessing public health impacts and potential future public health risks. We would welcome the opportunity to be included in the consultation around impacts on public health.
- Requests that the proposed consent condition 42(f) requiring notification to "Regional Public Health" is updated to "Health New Zealand | Te Whatu Ora, National Public Health Service".
- Recommends a condition that specifies the continuation of a Community Liaison Group that meets at regular intervals and Health NZ requests to be part of this group.

Neutral position on the grant of consent.

Garrick Emms – Submission 22

Noted the following concerns:

- Not a solution, only a trial
- Volumes of information to read and download
- Further detailed design to still be worked through
- Conflicting statements in the application
- Missing data, information
- Further questions on wetland structures, construction material, use of weather data, vegetation on irrigation mounds, nearby bores, and improvements to water quality

Opposed the grant of consent.

Erin Geange – Submission 23

Sought the following:

- SWDC to support consent renewal application for groundwater in 2030 for the same take rate and conditions
- 5-year consent term
- Discharge to the stream in low flows is prevented
- Screening of the land irrigation area via native planting
- Discharge to land is strictly controlled to avoid any flooding in the area and any transfer of odour across boundaries
- Strictly control and prevent contamination to surface and groundwater for neighbouring properties and undertake frequent monitoring

Neutral position on the grant of consent.

Ross Geange – Submission 24

Noted the following concerns:

- Suitability of land and associated infrastructure for irrigation
- The land is low lying and close to multiple streams
- More suitable land is available i.e. golf course

Opposed the grant of consent.

Peter Trafford – Submission 25

Noted the following concerns:

- The Featherston FWWTP seems in poor condition
- The proposed works are needed for any sort of chance to improve the surrounding environment, or for further process improvement
- Unclear that the works are affordable for the community, but far better to begin expenditure on improvements as soon as possible

Supported the grant of consent.

Dianne Connell – Submission 26

Noted the following concerns:

- Contamination of groundwater
- Property values
- Odour
- Flooding

Opposed the grant of consent.

Diana Leahy – Submission 27

Noted the following concerns:

- Sludge management
- Groundwater contamination

- High water table for irrigation area
- Lack of details around constructed wetland and costs
- Incorrect information used in the application

Opposed the grant of consent.

Wellington Fish and Game – Submission 28

Noted the following concerns:

- Increase in discharge volumes
- Inflow and infiltration to Featherston's sewerage network
- Consent limits rather than triggers
- Avian botulism
- The land application of wastewater is also supported
- Support riparian vegetation as an important factor to increasing freshwater ecosystem health. It is important that the riparian buffer is wide enough to make a significant contribution to the health of Donalds Creek
- Moderate pollution of water is an effect on water quality
- Monitoring needs to be robust and regular enough to provide information. Requests additional conditions be added to consent application relating to fish monitoring, clarity in Donalds Creek, periphyton growth monitoring, macroinvertebrate monitoring, and macrophyte monitoring

Neutral position on the application.

Rangitāne o Wairarapa – Submission 29

Noted the following concerns:

- Threats to water quality, groundwater, and mauri of waterways, and impacts on ecosystems and traditional practices
- Odour emissions that affect communities
- Groundwater diversions near wetlands disrupting sensitive ecosystems in the area

Supported the grant of consent.