Shotover WWTP Long-term Disposal Consent Strategy

Queenstown Lakes District Council

5 February 2026

LANDPRO.

1. Introduction

This is a consenting strategy that supports the short-listed options for the Queenstown Lakes District Council's (QLDC) Shotover Wastewater Treatment Plant (WWTP) disposal options project. Once a preferred option has been confirmed, an update to this consenting strategy will be provided that includes more specific recommendations relating to the consenting path for that option.

1.1 Project Summary

The QLDC Shotover WWTP treats wastewater from the wider Queenstown urban area. The existing treatment process includes inlet screens, Modified Ludzac-Ettinger (MLE) reactors, clarifiers, sludge treatment system, UV treatment and disposal. The plant has recently (October 2025) been upgraded with a second MLE reactor tank and clarifier.

Prior to March 2025, discharge of effluent from the treatment plant was occurring via the Dose and Drain (DAD) disposal field. The field was commissioned in 2019, and experienced significant performance deterioration and several non-compliances. Following a number of abatement and infringement notices an enforcement order was applied for by Otago Regional Council (ORC) in January 2025 and approved by the Environment Court in June 2025. The enforcement order includes a requirement for a resource consent to be lodged for a long-term effluent disposal solution by 31 May 2026[1]. The engineering design for the preferred solution is to be completed by 31 December 2027[2] with construction and implementation by 31 December 2030[3].

Emergency Works

The non-compliance at the DAD required QLDC to take immediate action to reduce potentially serious environmental effects created by the failures with the DAD disposal field.

These effects included a rise in waterfowl numbers attracted to the increased ponding at the DAD and surrounding areas. The danger for aircraft safety posed by increased numbers of birds in the area was potentially grave for human safety and required immediate action. QLDC responded to Queenstown Airport's concerns with urgency and took steps to divert the treated effluent discharge thus reducing ponding in the DAD field, and this was done by reverting to a historical discharge channel to the Kimi-ākau/Shotover River.

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[1] *Otago Regional Council v Queenstown Lakes District Council* [2025] NZEnvC 178, Annexure A (**Enforcement Orders**), Order 1.19.1.

[2] Order 1.19.2.

[3] Order 1.19

Ponding reduced and this action consequently reduced the numbers of waterfowl present and posing a risk. QLDC undertook the necessary works in accordance with the emergency works provisions[4] under the Resource Management Act 1991 (RMA) on 31 March 2025.

A short-term (5-year) resource consent application to ORC for the discharge of treated effluent to the Kimi-ākau/Shotover River was lodged in April 2025 and is currently being processed by ORC (as of January 2026). In December 2025 QLDC requested that the short-term application be processed via 'direct referral' to the Environment Court, instead of by ORC. The period for interested parties to join the Environment Court proceedings ended on 29 January 2026, with six parties lodging notices to join the proceedings as interested parties under section 274 of the RMA (s274 parties). The matter is currently awaiting directions from the Court.

Long-term Solution

QLDC concurrently commenced a business case which included scoping a long-term solution, undertaking relevant investigations and development of options for a new long-term disposal solution in October 2024 (this project).

The disposal solution is intended to replace the current effluent discharge to the Kimi-ākau/Shotover River and will cater for the long-term effluent disposal requirements (to Year 2060). QLDC's Long Term Plan (LTP) has allocated $77.5M of funding for the replacement disposal field solution.

1.2 Purpose of Consenting Strategy

The purpose of this consenting strategy is to outline the RRMA approvals, other relevant legislation and ongoing legislative reform to support the Councillors with making an informed decision on a preferred option for the long-term disposal of treated effluent from the Shotover WWTP.

The consenting strategy considers the available pathways to achieve the approvals associated with the construction, operation and maintenance of the short-listed disposal options.

The consenting strategy has been prepared having regard to the supporting technical expertise from GHD and assessments undertaken to date for the short-term discharge consent. It also considers the recent and proposed changes to the legislative and planning framework released by the Government in late 2025.

This consenting strategy is a living document that has been developed to support the preferred option decision-making and does not make recommendations on the consenting path for each of the short-list options at this stage. Once a preferred option has been selected it will be revisited, reviewed and updated (as required) to make more specific recommendations for consenting and engagement, or if further changes are made to relevant legislation prior to a decision and before approvals are sought.

[4] Section 330 RMA

2. Short-listed Options

The option development for this project commenced with a comprehensive long list of options that were evaluated in late 2024 looking at discharge methods and locations. These options are described in the GHD Short List report[5]. The long list options were initially refined down to five options (plus a Base Case for comparison) to carry forward to the short list stage. These were then further refined to the short list of options summarised below following consideration of some key assumptions such as land suitability and availability, effluent quality requirements for re-use, and disposal capacity of bores and groundwater aquifer.

The short-list options that are considered in this consenting strategy are shown in Table 1 below (summarised from the GHD Short List report – page 24).

[5] GHD (2025) *Short List | Shotover WWTP Disposal Field Alternative Discharge*

Table 1: Refined short list options summary (source: GHD Short List Report)

Option A Land flow path to Kawarau	**Option B** Wetland + land flow path to Kawarau	**Option C** Boreholes at Frankton (+ Option B)	**Option D** Soakholes at Frankton (+ Option B)
Discharge to water via land flow path to Kawarau River. Includes supplementary option of recycled water for reuse.	Discharge to water via a subsurface wetland and land flow path to Kawarau River. Includes supplementary option of recycled water for reuse.	Partial discharge to land via boreholes at Frankton with remaining flow to river via wetland. Includes supplementary options of recycled water for reuse and sports field irrigation Staged approach required.	Partial discharge to land via soakholes at Frankton with remaining flow to river via wetland. Includes supplementary options of recycled water for reuse and sports field irrigation Staged approach required.
For all options, there is the opportunity for refinement of the discharge method which includes the possibility of a pipe diffuser to improve mixing			

3. Key Planning and Environmental Considerations

3.1 Key environmental effects

Preliminary environmental effects assessments are underway with field investigations having already included

- monitoring of water quality from the discharge as it has progressed through the treatment upgrades, as well as in the Kimi-ākau/Shotover and Kawarau Rivers upstream and downstream of the current discharge and river confluence; and
- assessments of hydrogeology and groundwater flow through the installation and monitoring of groundwater bores across the delta.

Further investigations currently programmed for March 2026 will include ecology (macroinvertebrate and periphyton) and surface water hydrology and flow patterns/mixing.

The key potential effects to be considered include the following:

- Effects on water quality from the discharge of treated wastewater into surface water, land and/or groundwater;
- Effects on aquatic ecology within the receiving environment;
- Effects on hydrology – both flows (including risks associated with flooding) and effects associated with any ancillary works (e.g. works in the riverbed to construct an outfall);
- Effects on hydrogeology – groundwater flows and levels from any discharge into land or the aquifer;
- Effects on recreational and amenity values as a result of structures and presence of the discharge of treated wastewater at both a local scale, for visitors to the area, and cumulatively across the wider catchment;
- Effects on air quality;
- Effects on cultural values; and
- Effects on erosion and stability of the receiving environment – whether that be the Kawarau River and/or land on Frankton Flats.

Based on the preliminary understanding of potential effects and the MCAs for the short-listed options, a range of positive and adverse effects are likely to be experienced from all four options. These are summarised in more detail in the GHD short-list report.

3.2 Relevant Legislation

3.2.1 Local Government (Water Services) Act 2025

Recent legislation changes to the Local Government (Water Services) Act (WSA) were enacted at the end of August 2025. Section 254 includes the following statement:

Obligation to consider cost-effectiveness of wastewater options

(1) This section applies when a water service provider makes a decision relating to -

(a) options for providing wastewater infrastructure,

(b) options for treating wastewater.

(2) The water service provider must, when making a decision under subsection (1), choose the option it considers to be the most cost-effective option for providing wastewater services over the life of the infrastructure assets required to implement that option.

Cost-effectiveness is not defined in the WSA. The consideration under section 254 is of all "cost" over the life of the asset. So, it includes design, consenting and construction costs, operational and maintenance costs, and whole of life costs (including decommissioning costs), but does not mean the cheapest option upfront.

The need for decisions to be cost-effective must also be read considering the objectives of a water service provider (in this case QLDC). Section 17 of the WSA describes the objectives of a water service provider to include provision of water services that are reliable, resilient, of a quality that meets consumer expectations and meet all regulatory requirements, while also providing these services in a cost-effective and financially sustainable manner.

3.2.2 Water Services (Wastewater Environmental Performance Standards) Regulations 2025

Taumata Arowai released the final version of the Wastewater Environmental Performance Standards Regulations (WEPS) in November 2025. The standards include limits for treated effluent discharging into surface water and for land-based discharges.

A separate memo providing an interpretation of the WEPS as relevant to the short list options has been prepared by GHD[6].

As identified in that memo, there are several exceptions to the application of the WEPS. One of those exceptions, in relation to discharges of treated wastewater into water, is where the receiving waterbody meets the National Policy Statement for Freshwater Management (NPSFM) A Band attribute state (for each table in Appendix 2A of the NPSFM[7]). There is a related exception where the receiving waterbody meets those attributes but for any attributes that are not met as a result of a naturally occurring process[8]. In either of these cases, the WEPS will not apply to the discharge.

For the Kawarau River, current water quality information is available for a monitoring site approximately 8km downstream from the discharge point, which indicates that the A band

[6] GHD (2026) *Technical Memorandum on Impact of the new Wastewater Environmental Performance Standards*

[7] Regulation 43(1)(g)(i).

[8] Regulation 43(1)(g)(ii).

attributes are likely to be met, with the exception of cyanobacteria, periphyton and dissolved oxygen, for which there is currently no data available[9] at this stage. This information will be gathered as part of the March 2026 programme of investigation works.

The WEPS will also not apply to the part of the discharge directly into the aquifer (Option C) due to an exception provided by Regulation 43(1)(a). Furthermore, although not expressly excluded, the WEPS do not seem to envisage discharges in a vertical plane (e.g. soakholes in Option D) due to Part 4 of the WEPS[10] being designed for horizontal/areal disposal of treated wastewater framed on a 'kilogram per hectare per year' basis[11].

The potential for the discharges to adversely affect the cultural significance of a site is not considered within the GHD review. This will require further consultation with mana whenua once a preferred option has been selected.

It is also important to note that the WEPS do not limit the consideration of other relevant matters that are not covered by the specific limits in the WEPS. Examples of this may include cultural, landscape and amenity values. As any discharge application under the current rule framework is treated as a discretionary activity, full consideration of all relevant effects would continue. However, if the standards were to apply these points are worth noting:

- Where a wastewater environmental performance standard applies to the same activity as a rule in a plan, the performance standard prevails irrespective of whether the rule is more-or-less stringent.
- Where there is conflict or duplication wastewater environmental performance standards prevail over national policy statements (including the New Zealand Coastal Policy Statement), national environmental standards, regional policy statements, and regional and district plans.
- Where a resource consent was granted before a wastewater environmental performance standard is made, the resource consent will continue to prevail over that wastewater environmental performance standard until (if) the consent authority reviews the conditions of the consent and the review results in the wastewater environmental performance standard prevailing over the consent.

Regardless of whether the WEPS apply to the potential discharges proposed in the short-list options, considering the proposal against the parameters and limits identified within the WEPS as a comparison for effects assessment and consenting purposes will be a useful exercise.

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[9] Recent water quality testing carried out by GHD indicates that dissolved oxygen, visual clarity, *E. coli* and contaminant concentrations upstream of the area influenced by the Shotover WWTP discharges are consistent with Band A water quality.

[10] Discharge from wastewater treatment plants to land

[11] GHD (2026) *Technical Memorandum on Impact of the new Wastewater Environmental Performance Standards*

3.2.3 Kawarau Water Conservation Order

The Water Conservation (Kawarau) Order 1997 (WCO) recognises and protects outstanding values attributed to the Kawarau River and its key tributaries, including the reach of the Kimi-ākau/Shotover River proximal to the existing and proposed treated wastewater discharges. Any discharge or land-use change that could degrade the Kawarau or Kimi-ākau/Shotover River's outstanding characteristics will be assessed against the WCO protections. The Kawarau WCO focuses primarily on maintaining the natural state, water quality, and outstanding scenic, recreational and fishery values of the Kawarau and key tributaries. The specific outstanding characteristics of the Kawarau River are as follows (Schedule 2 Kawarau WCO):

- *wild and scenic characteristics;*
- *natural characteristics, in particular the return flow in the upper section when the Shotover River is in high flood;*
- *scientific values, in particular the return flow in the upper section when the Shotover River is in high flood;*
- *recreational purposes, in particular rafting, jetboating, and kayaking.*

The Kawarau WCO contains a restriction that requires waters of the Kawarau River and lower Kimi-ākau/Shotover River to be managed to 'Class CR standard'. This means maintaining contact recreation quality, specifically as it relates to swimming and wading activities. Schedule 3(5) of the RMA states that water being managed for contact recreation purposes must have visual clarity and quality suitable for bathing, and no undesirable biological growths as a result of any discharge of a contaminant to water.

Section 217 of the RMA, states that a consent cannot be granted for an activity:

- that would be contrary to any restriction or prohibition or any other provision in the order; or
- if the provisions of the water conservation order cannot remain (combined with the effect of the consent) without change.

In essence this means that a consent can only be granted if the water quality restrictions of Class CR are met, and as long as the outstanding amenity and intrinsic values can be maintained. The short-listed options, pending further design of the outfall, are expected to be able to comply with the water quality standards required by the WCO after reasonable mixing. The design of the outfall and discharge itself with additional filtration are likely to be able to be designed to ensure that the specific outstanding characteristics of the Kawarau River can be maintained.

Whilst in this case compliance with the Kawarau WCO does not rely on this, the WCO also contains exemptions/provisos to the restrictions and prohibitions contained in clauses

3(5)[12] and 4(5)[13] and Schedule 2[14] of the WCO. In particular, the exemption in clause 5(a) provides for the regional council to grant consents to maintain or protect existing network utility operations (of which the Shotover WWTP is one[15]) and clause 8 clarifies that the clauses 3(5) and 4(5) and Schedule 2 restrictions and prohibitions, do not limit the regional council's ability to grant consents to replace or substitute an existing resource consent if is substantially the same terms and conditions as the existing consent. Whilst any of the short list options result in a different discharge than the previous DAD consent, the ultimate receiving environment of the Kawarau River waters is the same with similar (or better) quality of treated wastewater discharge so this will be a relevant factor that forms part of any consent application.

The WCO and NPSFM (discussed below) operate concurrently. While the provisions of the NPSFM cannot directly override protections provided in a WCO, the NPSFM can raise the baseline for environmental protection if its national objectives are more stringent than the WCO provisions. This is discussed further below.

3.2.4 National Policy Statement for Freshwater Management (NPSFM)

Central government-driven reform continues to modify statutory obligations at the national level, which has and will continue to influence objectives and policies of the NPSFM. The Government has signalled that new national direction will be introduced from mid-2026. There is no clarity on what any changes might look like at this stage.

The current NPSFM sets clear national objectives and policies that local councils must give effect to, specifically with regard to freshwater and how it is managed. Key elements of the NPSFM include Te Mana o te Wai (prioritising the health of freshwater and associated ecosystems above social, economic and cultural needs), maintaining or improving water quality and freshwater ecosystem health, and setting water quality limits to ensure freshwater objectives are met.

The NPSFM's National Objectives Framework (NOF) requires regional councils to set water quality, ecosystem health and human contact baseline and target values in regional planning documents. These values are directly relevant to the present short list options and provide a basis for future changes to regional plans.

The recently enacted Resource Management (Freshwater and Other Matters) Amendment Bill requires that consent authorities must not have regard to clauses 1.3(5) and 2.1 of the NPSFM, which relate to the hierarchy of obligations. However, Policy 1[16] still requires consideration of the fundamental concept of Te Mana o te Wai[17]:

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[12] Preservation in natural state.
[13] Protection of characteristics.
[14] Waters to be protected.
[15] Pursuant to s166(1)(e) of the RMA.
[16] "Freshwater is managed in a way that gives effect to Te Mana o te Wai"
[17] Clause 1.3(1) NPSFM

"…the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment. It protects the mauri of the wai. Te Mana o te Wai is about restoring and preserving the balance between the water, the wider environment, and the community."

Further changes to the NPSFM will continue to occur as national resource management direction evolves, however under the current NPSFM, the short-listed options are expected to be able to be designed to ensure the NOF target values can be met after reasonable mixing. The environmental assessments and consent application documents for the preferred option will evaluate the discharge against the individual NOF target values including national bottom lines, as well as the current Regional Plan (Schedule 15) water quality limits and WCO water quality limits.

3.2.5 National Policy Statement for Infrastructure

A new NPS for Infrastructure (NPS-I) was introduced as part of the broader resource management reforms and took effect on 15 January 2026. The NPS-I sets out policies to enable, recognise, and protect new and proposed 'infrastructure'[18] and 'additional infrastructure', as defined in the RMA and the NPS-I[19].

Its main objective is to ensure decision-makers recognise and provide for infrastructure benefits at national, regional, and local levels, so infrastructure can meaningfully contribute to community wellbeing while also ensuring infrastructure is well-functioning, resilient and compatible with other activities and essential services are delivered efficiently and on time, while managing environmental effects appropriately.

Eleven new policies are included. These require decision-makers and/or infrastructure providers to:

- recognise and provide for the significant public benefits of infrastructure (Policy 1);
- recognise that infrastructure may have an operational or functional need to operate or be located in particular locations or environments (Policy 2);
- enable efficient and timely infrastructure operation and delivery, while also recognising it is the role of the infrastructure provider to identify the preferred location of the activity (Policy 4);
- recognise and provide for Māori interests in relation to infrastructure activities by taking into account the outcome of any engagement for any relevant resource consent, while local authorities must also provide opportunities for tangata whenua involvement where the infrastructure activity may affect a site or issue of cultural significance to Māori (Policy 6);

[18] The NPS-I's definition of "infrastructure" includes the RMA's definition (which itself includes a drainage or sewerage system).

[19] Clause 1.4(1) of NPS-I

- when assessing and managing effects of activities consider the extent to which effects have been avoided, remedied or mitigated through the options selection, the technical and operational requirements and constraints of infrastructure activities, degree of difference from existing infrastructure and inclusion of conditions that are proportionate to the scale of the effects of activity (Policy 7)); and
- enabling new infrastructure or major upgrades of existing infrastructure in all environments and where there may be adverse effects on those matters in Section 6 of the RMA, consider this policy alongside other relevant national direction, regional policy statements, and regional plans, while for areas where Section 6 don't apply, effects must be avoided, remedied or mitigated where praticable (Policy 9).

The NPS-I will enable applicants to explicitly reference the new policies to support location constraints, operational needs, and wider public benefits. While environmental outcomes remain important, this new national direction is highly enabling of both new, and upgrades to existing infrastructure and may give more weight to infrastructure outcomes when balancing environmental considerations.

3.2.6 Regional Policy Statement

There are two current Regional Policy Statements in Otago - Otago Regional Policy Statement 2019 (ORPS) and Proposed Otago Regional Policy Statement 2021 (PORPS).

The ORPS provides the region's existing higher-level objectives and policies that regional and district plans must give effect to. Core themes driving objectives and policies in the ORPS include integrated management, protection of freshwater and groundwater values, and iwi involvement in decision making. The PORPS (Decisions version) further strengthens freshwater direction, directly giving effect to Te Mana o te Wai, increasing emphasis on avoiding further degradation, managing connectivity between groundwater and surface water, and prioritising iwi partnership. Key policy drivers in relation to the short list options are explored in Table 8 from the short list report (attached as Appendix A).

Evaluating the short-listed options against the relevant policies in the ORPS and PORPS indicates that in general they are likely to be able to demonstrate consistency with the overall policy direction in respect of instream effects on water quality and ecology values, pending further design. Notwithstanding this, providing for Kāi Tahu values as mandated in the various policies will prove difficult, on the basis of where discussions with iwi currently are. The decision-maker will need to weigh up the proposal against all the relevant, and sometimes conflicting, policies in reaching their decision, and there will be potential to develop conditions that support addressing some specific concerns.

It is worth noting that PORPS Objective LF-FW-01A(8) advocates for the phase out of direct discharges of wastewater to water bodies, to the extent reasonably practicable. While this is directly relevant to the shortlist options being considered, significant weight can be afforded to the 'to the extent reasonably practicable' part of the Objective. Given that the long list and short list selection process is seeking the most environmentally, economically, and socially-feasible solution to treated wastewater disposal, it can be considered that this objective will have been given effect to as it is not reasonably practicable, in these circumstances, to completely phase out direct discharges of wastewater to water bodies.

Alternatives to the current short-list options have been considered within the long-list report, as well as by way of an assessment of land-disposal feasibility within a wide radius (25km) from the Shotover WWTP and a review of the former DAD performance and rehabilitation potential.

3.2.7 RPW

The Regional Plan: Water for Otago (RPW) was made operative on 1 January 2004 and is the primary document that manages water within the Otago region's boundaries. Due to the age of this plan, many of the objectives and policies do not accurately reflect the provisions of more recent, higher-order environmental legislation. For this reason, more weight should be afforded to the Otago RPSs than the provisions of the RPW. A summary assessment of the relevant objectives and policies in the RPW is include in Table 9 from the short list report (attached as Appendix B).

Under the current discharge rules in the RPW, any application for the discharge of treated wastewater via the short-list options would likely be treated as a full discretionary activity, pending the classification of other associated activities.

3.2.8 Sections 105 and 107 RMA

Because of the likelihood as discussed in GHDs report[20] that the WEPS will not apply to any of the short-list options (with the exception of those parts of Options C and D proposing sub-surface irrigation to sports and recreation areas[21]), the consent application that is prepared for the preferred option will need to consider the matters in Sections 105 and 107 of the RMA.

Section 105 requires that the decision-makers must 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.

An assessment of alternatives to the ultimate preferred option will be prepared as part of the consent application. As outlined above, evaluations of alternatives are addressed through the short-list report, the long-list report, in the assessment of land-disposal feasibility[22], and in a review of the former DAD performance and potential for rehabilitation and continued use (provided separately). These reports consider a broad range of factors

[20] At Section 3.2.2.2 (in respect of the 'discharge to water' components of the short-list options) and Section 4.1.1 (in respect of the 'discharge to land' components).

[21] This type of land discharge is covered by the WEPS; see Section 4.1.3 of GHD's report.

[22] Appendix G of short-list report

including, among other matters, cultural effects, environmental effects, technical feasibility, ability to service the future community, and costs.

The reasons for the preferred option will be supported by the technical recommendations as well as the Business Case and decision reports from Council.

Section 107 prevents the decision-maker granting a discharge consent if it would result in any of the following, after reasonable mixing:

- the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials:
- any conspicuous change in the colour or visual clarity:
- any emission of objectionable odour:
- the rendering of fresh water unsuitable for consumption by farm animals: or
- any significant adverse effects on aquatic life.

Initial evaluations by the technical team indicate that all of the short-list options are likely to be able to demonstrate consistency with these matters in respect of instream effects on water quality and ecology values, pending further design. A detailed assessment to demonstrate compliance with section 107 will be provided in the consent application and will feed into the preliminary design.

3.2.9 RMA Reform - Proposed Replacement Bills

On 9 December 2025 the Planning Bill 2025 and Natural Environment Bill 2025 were introduced to parliament. These bills are set to replace the RMA, with current indications suggesting that the bills will become law by around mid-2026.

These bills have moved away from an overarching purpose and now have "goals" in each that set out the outcomes being sought. There is no hierarchy between the goals, and the focus is on enabling use and development of natural resources within environmental limits (under the Natural Environment Bill) and supporting and enabling economic growth via enabling the use and development of land (under the Planning Bill).

Some key points to note from the current draft legislation that may affect the consenting of the short-list options are:

- WCO requirements prevail over national rules if the WCO is more restrictive.
- There will be no direct referral pathway available, only regular consenting or alternatively fast track (see further discussion below).
- Benefits with some effects that no longer need to be considered (e.g. amenity values no longer need to be assessed).

- Simpler notification tests requiring public notification only for significant adverse effects (under the Natural Environment Bill) not just more than minor[23].
- Fewer appeals.
- Positive effects of an activity must be considered[24].
- There are some conflicting goals within the current bills for which these tensions will be resolved/clarified in the national policy direction that is due to be released by around March 2027.

3.2.10 Risks/opportunities associated with timing of application

If the consent application for the preferred option is lodged after the new bills become law (mid-2026), they will be considered under both the current RMA and the new bills through a "transition period". Some elements of the transitional consenting framework may provide opportunities for the consenting process for the Shotover WWTP treated effluent disposal:

- the removal of the special circumstances test for public notification and limiting affected parties to only those on whom the activity's adverse effects are "*more than minor*";
- removal of consideration of "*less than minor*" effects;
- public notification only for significant adverse effects not just more than minor; and
- exclusions on the scope of effects (e.g. amenity).

However, there are a number of other risks associated with submission under the new bills:

- Being one of the first significant applications under a new system that is as yet untested.
- Not having any national policy direction available until 9 months after bills becoming law (early 2027).
- New Regional Plans have not yet been formulated so any application will still be under existing rules – but unsure how transition plans to deal with different activity classifications between new Acts and existing Regional Plans (e.g. no controlled or non-complying activities under new Acts).
- Direct Referral not available under current Bills, however during the transition period[25] the RMA continues to apply, subject to amendments made through Part of the Schedule 11 of the Planning Bill[26]. Accordingly, on the current wording of the Bills it appears that applicants may still apply for direct referral during the transition

[23] Clause 146(6) of Natural Environment Bill

[24] Clause 14(a)(i)

[25] The transition period commences 1 month after Royal Assent of the new legislation and will end on a date specified by Order in Council (Planning Bill, Schedule 1, Part 1, clauses 3-4).

[26] Part 1 of Schedule 11 does not contain any amendments addressing the direct referral process under the RMA.

period. Even so, there remains uncertainty about how direct referral will be provided for in the final (as enacted) Acts, therefore if direct referral is removed as an available option for QLDC (this may delay timeframe to obtain a decision (in the event that a standard consenting process is the only option).

- Because of current unknowns and uncertainties (Acts could change from the current Bills following select committee), it is more certain if an application is submitted under the current RMA process, as being a "test case" could delay process with appeals.

4. Approval Types and Pathways Available

This section outlines the likely approvals required under the existing RMA and the potential pathways for obtaining the necessary approvals for the Shotover WWTP short list disposal options. They are referred to in each of the subsequent sub-sections.

4.1 Approvals Required

The broad activities associated with each of the options include:

- Discharge of treated effluent to land and/or water;
- Earthworks to construct the disposal system;
- Works in the Kawarau Riverbed to construct an outfall;
- Discharge to air;
- For Options C & D, construction of bores/soakholes; and
- Any other construction related activities (e.g. diversions).

4.1.1 Regional Council

A resource consent from the Regional Council will be required for all of the short list options. This will be for the discharge of treated wastewater to land and/or water, as well as for any ancillary activities that also trigger consent rules (more will be known once preliminary design is available for the preferred option) that may include placement of structures in the bed, drilling of bores, diversion of water and earthworks.

4.1.2 District Council

There is an existing designation over the site. This designation includes all QLDC owned land down to the Kawarau River margins, but does not include the proposed location of any outfall. Figure 2 shows the designation area highlighted.

The delta area is zoned a combination of Rural for the area of the treatment plant and oxidation ponds, and Informal Recreation over the southern part of the delta. The end of the delta not identified as a land parcel is zoned as Water. The whole delta site is identified as Priority Area within the Schedule of Landscape Values.

Potential areas where works would be required for Option C or D have a range of zones under the Operative Plan including Frankton Flats, Frankton Flats B, Remarkables Park, Rural General and Industrial A Zones, while under the Proposed Plan these are similar with

Frankton Flats, Frankton Flats B, Remarkables Park, Community Purposes, Airport, and General Industrial and Service and Water (underlying Rural).

Section 176(1)(a) of the RMA sets aside the application of land use rules under s9(3) RMA such that consents that would normally be required for those activities are not required for works within a designation. Activities outside the designation that require resource consent from the District Council could be addressed by altering the designation to incorporate them into the designation such that those consents would no longer be needed. An alternative is to apply for any land use consents from the district council if required for works outside the designation. This may be appropriate depending on the preferred pathway for the Regional Council consents. Further assessment against the Queenstown Lakes District Plan will be required in this circumstance and a preferred approach determined at that time.

Figure 1: Designation #46 for the Shotover WWTP taken from Queenstown Lakes Operative District Plan shown with light blue polka dot shading.

4.2 Staging for Option C or D

Option A and Option B are assumed to require only a single wastewater discharge consent, reflecting long term discharge to water (Kawarau River).

For Option C and Option D, the staged implementation of land disposal and likely land disposal capacity constraints, are expected to result in wastewater discharge consents being required for both discharge to land (Frankton Flats) and discharge to water (Kawarau

River). For discharges to land, a staged approach that consents an envelope of effects, with limits and environmental performance standards, is proposed. Progression through the consent stages, as with progression through the stages of testing land disposal capacity, is premised on demonstrating that effects remain within the acceptable envelope.

Two general approaches may be available for consenting of Option C and Option D, depending on acceptance by ORC:

1. Consenting of discharges to water (Kawarau River) and discharges to land separately, providing time for investigations of Frankton Flats aquifer to inform the viability and likely environmental effects of land disposal via bores or soak holes, and subsequent demonstration of long term viability via trial.
2. Bundled consenting of discharges to water (Kawarau River) and discharge to land, with conditions of consent providing the requirements and performance standards around the investigations, trialling and long term disposal to land at Frankton Flats.

The following Figure 1 outlines these possible consenting pathways which could be applied.

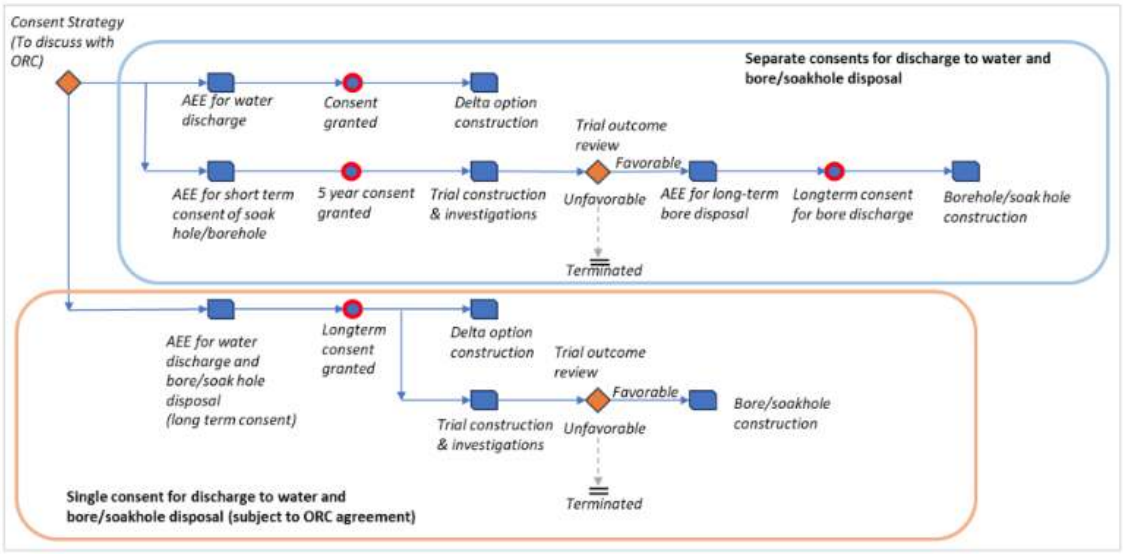

Figure 2: Possible consenting pathways for Option C or D

4.3 Approvals Pathway

There are three RMA approvals processing options available to QLDC for obtaining the necessary resource consents (and any district consents/NoR) for the new Shotover WWTP disposal system. These options are:

- Determination by the Consent Authority (ORC and QLDC);
- Direct referral to the Environment Court; and
- Determination through the Fast Track Consenting Process.

The pathways have been assessed in Table 1 below.

Pathway / Process Option	Advantages	Disadvantages / Risks	Opportunities / Mitigation
Determination by Consent Authority (ORC and QLDC) through a standard 'two-stage' process: - Consent lodged with Council; - Council makes notification decision (public, limited, non-notified); - Likely public notification and a hearing will be held; - Submitters can appeal on any matter to Environment Court; - Hearing at Environment Court; - Opportunity for further appeals (High Court, Court of Appeal, Supreme Court) on matters of law only.	Enables greater ORC interaction in addressing key project risks and conditions. Maintains collaborative approach to refining key aspects of the design with iwi partners, stakeholders and local community. Statutory timeframes dictate the processing period for resource consents (but this is contingent on many factors). Some limited prospect of this process being quicker than the "one stop shop" options (described below), provided the decision is not appealed to the Environment Court. Maintains the "second-shot" appeal process at achieving outcomes if a negative decision or conditions (resource consent) are received. A perception of a "friendlier" environment, that is more accommodating and considerate towards local community.	Decision has high chance of being appealed to the Environment Court, impacting programme timeframes (up to 18 months from lodgement) and delaying the project. Any appeal delays may risk the ability to construct and implement a new disposal system by the date required in the Enforcement Order of 31 December 2030. This is significant risk for the project with this pathway.	If appealed to the Environment Court, the hearing would be limited to the resolution of outstanding issues rather than rehearing all the submitter issues making a more efficient process. Allows time prior to Council hearing to resolve submitters issues helping to ensure an efficient hearing process. A comprehensive engagement strategy could assist in reducing concerns/submissions from the general public and directly affected parties.
Direct referral to the Environment Court - Consent lodged with Council; - Council makes notification decision (public, limited, non-notified);	Intended to streamline decision-making for contentious, larger scale and/or complex applications that are likely to end up in the Environment Court on appeal following a Council hearing anyway, substantially increasing consenting timeframes. Most likely to achieve a decision that enables the construction and	Conditions may be issued that are not favourable with no ability to appeal. Some uncertainty about whether this pathway will be available if application submitted after mid-2026 when new Planning Bill takes	A comprehensive engagement strategy could assist in reducing concerns/submissions from the general public and directly affected parties.

Pathway / Process Option	Advantages	Disadvantages / Risks	Opportunities / Mitigation
- Applicant requests direct referral after notification/submissions received; - Hearing at Environment Court with all s274 parties (submitters who have decided to join the proceeding); - Opportunity for appeal on matters of law only.	implementation timeframe of 31 December 2030 to be achieved. Full community and stakeholder participation still provided for through this process and ability to speak at the Court hearing.	effect (based on current drafting) – see discussion below.	
Determination through the Fast Track Consenting Process by an appointed panel - Seek referral of application to Fast-track; - If accepted for referral, submit substantive application; - Panel convenors appointed and seek comment from certain parties; - A hearing may or may not be held before a decision is issued; - Opportunity for appeal on matters of law only.	The process involves applying for referral to use the Fast-track process, followed by a substantive application for the approvals needed. Panels can hold hearings, prepare or commission reports, request advice and identify the appropriate people to invite comments from. The Act does not allow panels to give full public notification or limited notification for comments. A panel's decision to grant or decline an approval may be appealed to the High Court. Appeals can be against the whole or a part of the decision, but only a on question of law. Only people specified in the Act can appeal.	The process does not allow for wider public/community involvement in the process. Conditions may be issued that are not favourable with no ability to appeal. Not necessarily significantly faster than direct referral process from observation of other projects using this pathway to date. Fast track is a very expensive process with substantive application fees in realm of $450,000 (incl GST), not including application preparation or legal costs.	This pathway is an opportunity to develop a comprehensive application that encompasses all approvals (Regional, District and DoC if required).

5. Engagement

5.1 QLDC Significance and Engagement Policy

QLDC's Significance and Engagement Policy | Te Kaupapa Here Kiraka Whakapa was prepared in 2021. It provides certainty on:

- When and how the Council will engage or consult with communities;
- What the Council will take into account when deciding what is significant; and
- When the community will have a direct opportunity to contribute to decision-making.

The matters of consideration as to whether this Shotover WWTP disposal project meets the test of "significance" have been reviewed and three of the points are relevant:

- Importance to the Queenstown Lakes District (relates to a strategic asset);
- Community interest; and
- Mana whenua values.

Being identified as a project of significance does not necessarily mean a formal special consultative procedure is required, but does indicate consultation and engagement is warranted. Recommended consultation for this project has been included in the Consultation and Engagement Plan, and is being further developed with a separate Iwi Engagement Strategy and Communications Strategy.

5.2 Consultation and Engagement Plan

A consultation and engagement plan was prepared at the commencement of the optioneering work in late 2024 (attached as Appendix C). This identified that engagement with stakeholders should occur early in the process to inform the development of preferred options prior to submission of a resource consent. Varying methods of engagement were recommended reflecting the roles of different stakeholders. These included the following:

- **Inform** – to provide balanced and objective information to assist parties to understand the proposed development and we can demonstrate how effects on them will be managed
- **Consult** – to obtain feedback on the proposed development, including effects that have not been considered or properly examined and alternative methods of mitigation to address those effects.
- **Involve** – to work directly with stakeholders to ensure their concerns and aspirations are understood and considered, including seeking their feedback on effects and potential mitigations associated with shortlisted options so an informed decision can be made by Council/project team on preferred option.

- **Collaborate** – to partner with stakeholders on decisions concerning the proposed development, including the development of alternatives and identification of the preferred solution.
- **Empower** – allow stakeholders to make decisions regarding the proposed development.

Since that initial consultation and engagement plan was prepared, further separate plans are being prepared by way of an Iwi Engagement Strategy and Communications Strategy.

5.3 Mana Whenua

Given the significance of the Kimi-ākau/Shotover and Kawarau Rivers to iwi, the proximity of the discharge to surface water and the cultural concerns with human effluent discharges in and around water, all four options are likely to impact on cultural values given the range of known and anticipated cultural, spiritual and historical values and identified effects. A strong partnership with mana whenua is important.

Ongoing engagement with representatives from Te Ao Marama Inc (TAMI) and Aukaha – representing the local runaka – has been occurring on a roughly fortnightly basis since the project commencement in late 2024. This enables two-way discussion on a frequent basis and transparency to ensure all relevant information on the project is shared as it becomes available withTAMI and Aukaha.

TAMI and Aukaha have also participated in the development of the scoring criteria and the long-list optioneering/scoring workshop. They decided not to participate in the short-list workshop. Instead, they provided a position statement outlining their values and concerns with the disposal options (attached as Appendix D).

As part of QLDC's desire to continue a partnership approach with mana whenua, a more detailed iwi engagement strategy is now in preparation which includes the confirmation of a mana to mana hui between runaka leaders and QLDC Councillors prior to any decision being made by Councillors on a preferred option from the short-list.

Once a preferred option has been chosen, engagement with mana whenua will continue through the preliminary design and consenting process.

5.4 Other Key Stakeholders

Within the consultation strategy the following other key stakeholders were identified at the "Involve" or "Consult" level:

Involve

- QLDC Parks & Recreation Teams
- ORC Consents Team
- ORC Natural Hazards Team
- Department of Conservation
- Fish and Game

Consult

- Queenstown Airport Cooperation (QAC)
- Heritage New Zealand Pouhere Taonga
- Remarkables Park Ltd

Meetings and information sharing with feedback has occurred with those parties in the Involve category and QAC, which has informed the short-list options, or has helped the project team understand the factors/mitigation that will need to be accommodated in the detailed design for each of the short-list options.

Feedback from DOC on the short-list options indicated that they were concerned about deep well injection options due to the generally relatively high quality "clean" water that can be expected in groundwater aquifers. They were also concerned that adverse effects would be harder to identify and remedy and therefore did not support that as an option. DoC advised that they would not provide comment on the other short-list options due to the concerns raised by mana whenua in regards to their view they are "fatally flawed".

Fish and Game are primarily concerned with the potential implications on water quality and wildlife from any of the short-list options. They have noted that there is angler use on the Kimi-ākau/Shotover upstream of confluence and on the Kawarau River. They would like to see that the level of treatment and mixing within the receiving environment for discharges does not result in significant water quality degradation and that the potential cumulative effects are given proper consideration for the downstream catchment in terms of contaminant loads. Effects on anglers will need to be considered with appropriate signage installed to advise of the location of any discharge and restrictions on use of the area, if any, that apply.

Discussion with the ORC Hazards team has identified their concerns with ensuring that the integrity of the training line remains intact. Based on the current understanding of the potential effects of the short-list options on the training line, further engagement through the preliminary design phase should be sufficient to mitigate any concerns.

After the long-list of options were developed, which included options for irrigation of land at Frankton Flats, meetings with QAC were held to understand and consider their feedback. QAC's primary concern was aviation safety and any operational impacts the Frankton disposal options may create as a result of construction and/or operation of new disposal infrastructure. QAC also expressed concern that installing discharge infrastructure could make the land unsuitable for construction and undevelopable in the future as there are master plans already in place with future development planned[27]. This feedback contributed to the short-list options now available with moderate rate land infiltration to land on Frankton Flats not being carried through. Consultation will continue with QAC as the preferred option is chosen to ensure potential impacts on the airport can be mitigated as far as possible.

Consultation with the QLDC Sport and Recreation team also took place after the initial long-list development to discuss potential implications for the Queenstown Events Centre (QEC). QEC development plans include extension of the sports fields and introduction of additional infrastructure, buildings, and facilities on the site, to support the community's future

[27] See section 4.1.1 of the GHD Short-List Report for further details of QAC's specific concerns.

recreational needs. This informed further evaluation of these options and associated constraints to disposing of wastewater via moderate rate methods in this location[28].

Stakeholders that were also identified in the consultation and engagement plan at the "Inform" level include Kawarau Jet and Queenstown Trails Trust. Discussions have been held with Kawarau Jet and agreements are in place to ensure they are kept informed of progress and mitigation measures are developed as required to ensure their operations are not compromised as far as possible. Once a preferred option has been selected as part of preliminary design stage, engagement with QTT will be undertaken to confirm potential impacts and provide for mitigation of areas of concern where possible.

5.5 Property considerations

Options A and B are located mostly on QLDC owned land and land managed by LINZ (for riverbed/margins).

A detailed breakdown of exactly which properties would be potentially impacted by Options C and D in particular is not yet available. There may potentially be some impact on other landowners for these Frankton Flats options which would require land purchase or easements, but primarily the options are looking at QLDC road corridors.

Once a preferred option is confirmed and preliminary design is underway, properties that may be impacted will be identified and discussions with the owners will commence.

5.6 Wider community

A Communications Strategy has been prepared by the QLDC Communications team and has been actioned since late 2025. This includes information having been made available on social media, in local newspapers and via a project specific page on the website. Three public drop-in sessions were held in mid-December 2025 and late January 2026 with these being advertised across multiple media platforms. There was very limited attendance from the community with only 10 people attending over the three sessions.

Further communication and engagement with the community will be held once a decision has been made on the preferred option as part of the concept design, consent preparation and development of proposed conditions/mitigation options. The webpage will continue to be updated with further information on the preferred option as it becomes available after the Council decision.

[28] Discussed in Section 4.1.2 of GHD Short-List Report

Appendix A – RPS Policy Assessment

Table 8 Key policy drivers

Policy driver	Overview of intent	Relevant ORPS objectives & policies	Relevant PORPS objectives & policies	Assessment against options
Te Mana o te Wai	The PORPS requires that Te Mana o te Wai must be recognised and given effect to in decisions affecting freshwater but includes identification of use of water for personal hygiene (such as toilet flushing) under the second priority. The ORPS includes comparable obligations to maintain or enhance water quality and ecosystem health.	Obj 1.1, Pol 5.4.1 – Maintain and enhance freshwater quality and ecosystem health.	LF–WAI–O1, O2, LF-WAI-P1, LF–FW–P2 – Prioritise the health of water bodies and ecosystems.	Discharge of treated wastewater to the Kawarau River (all options) must be able to demonstrate that the freshwater values of the river will at least be maintained – no degradation may occur. Deep well injection and soak hole disposal options will also need to demonstrate no direct degradation to groundwater resources, and secondarily to the river via hydraulically connected groundwater. If comparing to the status quo and consented baseline from DAD disposal, consistency with the relevant policies and objectives is possible.
Protect outstanding and regionally significant values	Both RPS's require avoiding significant adverse effects on water bodies (including groundwater-surface water interactions) and protecting key values such as mahika kai, aquatic ecology, recreation and natural character. The PORPS includes specific direction for wastewater discharges that encourages phasing out of disposal to water to the extent practicable.	Obj 5.3.1, Pol 5.4.2 – Avoid, remedy or mitigate adverse effects on the natural and human use values of water.	LF–FW–P6, LF–FW–P7 – Avoid further loss or degradation of aquatic ecosystems and habitats and LF-FW-P16 – impacts of wastewater discharges	To be consistent with the relevant RPS objectives and policies, each option will need to provide the following: – Exceptional water quality modelling, showing no adverse effects on freshwater objectives; – Robust ecological and recreation assessments showing negligible impact on these values; – Meaningful cultural impact assessment co-developed with Aukaha, Te Ao Marama and papatipu Rūnaka; – Adaptive management and consent compliance monitoring that satisfies the ORPS precautionary approach; – Robust assessment of alternative that considers and practical land disposal options.
Recognise and provide for mana whenua involvement	The ORPS requires active involvement of Kāi Tahu and recognition of iwi values, while the PORPS expands on iwi partnership mechanisms and involvement in freshwater governance.	Obj 2.1, Pol 2.2.1 – Recognise and provide for Kāi Tahu values and involvement in resource management.	MW–O1, MW–P1–P6 – Require partnership with mana whenua and protection of mahinga kai, wāhi tapu, and mauri.	Iwi involvement is already being provided for via the long list and short list workshops and ongoing reviews and correspondence. This partnership is proposed to continue throughout the option selection and consenting process. Despite iwi involvement throughout the process, achieving consistency with Kāi Tahu expectations will prove very difficult, particularly with regards to direct discharge to culturally significant rivers.
Integrated management and	Both RPS's require integrated consideration of water, land, air and iwi values. Where	Obj 1.2, Pol 1.5.1 – Manage land and water	IM–O1, IM–P2 – Adopt ki uta ki tai (mountains to	Ensuring consistency with these policies will hinge on the existing wastewater treatment literature (particularly with regards to

precautionary approach	uncertainty of effects exists, apply a precautionary approach via monitoring and adaptive management.	in an integrated way.	sea) approach; integrate management across domains.	alternative disposal methodologies like deep well injection), history of wastewater discharges and associated monitoring in the Shotover River, and ensuring robust assessments that consider cumulative impacts on land, water, air and cultural values.
Regionally significant infrastructure	The RPSs recognise the need for regionally significant infrastructure to be provided for where the effects can be managed that account for their functional and operational needs.	Obj 4.3, Pol 4.3.3, 4.3.4 - Managing infrastructure activities.	EIT-INF-O4, EIT-ENF-P10, EIT-ENF-P13, EIT-ENF-P14 – Provide for infrastructure while managing effects.	The significance of the WWTP system and disposal for the region is clear. Consideration of alternative disposal methods as shown through the optioneering and the functional and operational need to locate the disposal system at any of the short-listed options will ensure consistency with these provisions.

Appendix B – RPW Policy Assessment

Table 9 *RPW objectives assessment*

RPW provision	Provision wording	Assessment
Issue 4.13.5	Discharge of human waste and other contaminants to Otago's water bodies from point and non-point sources is an affront to Kāi Tahu.	All of the options being considered involve the direct discharge of treated human wastewater to the Kawarau River. This has the potential to undermine the strong cultural relationship that iwi have with fresh water, and to negatively impact mahika kai opportunities associated with the river (from a cultural perspective).
Objectives 7.A.1 to 7.A.3	7.A.1 To maintain water quality in Otago lakes, rivers, wetlands, and groundwater, but enhance water quality where it is degraded. 7.A.2 To enable the discharge of water or contaminants to water or land, in a way that maintains water quality and supports natural and human use values, including Kāi Tahu values.	The treated wastewater disposal options are being considered with a view to maintaining the water quality of and avoiding adverse effects on the Shotover and Kawarau Rivers to the extent practicable. Direct discharge to the Kawarau River has the potential to adversely affect human use values (i.e. recreation uses in the river) as a result of the
	7.A.3 To have individuals and communities manage their discharges to reduce adverse effects, including cumulative effects, on water quality.	perception associated with the discharge of treated wastewater into the river environment, and is not consistent with Kāi Tahu values.
Policy 7.C.1	When considering applications for resource consents to discharge contaminants to water, to have regard to opportunities to enhance the existing water quality of the receiving water body at any location for which the existing water quality can be considered degraded in terms of its capacity to support its natural and human use values.	The explanation for this policy states that there is an opportunity to achieve an enhancement in water quality where an existing discharge may be subject to a new resource consent. All of the options being considered are likely to provide for this, by utilising newer, more efficient wastewater treatment technologies. An analysis of historic water quality monitoring records from the receiving water bodies against anticipated receiving water quality under any new or upgraded treatment and disposal system being considered will help to demonstrate the potential for water quality improvements in a consent application.
Policy 7.C.2	When considering applications for resource consents to discharge contaminants to water, or onto or into land in circumstances which may result in any contaminant entering water, to have regard to: (a) The nature of the discharge and the sensitivity of the receiving environment to adverse effects; (b) The financial implications, and the effects on the environment of the proposed method of discharge when compared with alternative means; and (c) The current state of technical knowledge and the likelihood that the proposed method of discharge can be successfully applied.	The explanation to this policy states that when considering the avoidance, remedy or mitigation of adverse effects of any discharge, consideration of the matters in (a) to (c) will ensure that financial and technical constraints of alternative discharge methods will be recognised alongside the sensitivity of the receiving environment. The technical and financial constraints of the short-listed and long-listed options have been summarised in this and previous reports This will support the alternatives assessment required as part of the future consenting process, with further analysis needed of the preferred option in respect of the sensitivity of the environment receiving the discharge.
Policy 7.C.3	When considering any resource consent to discharge a contaminant to water, to have regard to any relevant standards and guidelines in imposing conditions on the discharge consent.	Rather than setting numerical standards for given contaminants, the RPW identifies specific natural and human-use values that must not be compromised by any wastewater disposal option being considered. Relevant standards are expected to be able to be met under the short-listed options but further work may be required in terms of how the discharge is introduced to the receiving environment to encourage rapid mixing.

RPW provision	Provision wording	Assessment
Policy 7.C.4	The duration of any new resource consent for an existing discharge of contaminants will take account of the anticipated adverse effects of the discharge on any natural and human use value supported by an affected water body, and: (a) Will be up to 35 years where the discharge will meet the water quality standard required to support that value for the duration of the resource consent; (b) Will be no more than 15 years where the discharge does not meet the water quality standard required to support that value but will progressively meet that standard within the duration of the resource consent; (c) Will be no more than 5 years where the discharge does not meet the water quality standard required to support that value; and	While this policy remains relevant, it is largely superseded by amendments to the RMA via the Local Government (Water Services) (Repeals and Amendments) Act 2025, which mandates a 35-year term for eligible infrastructure – particularly public schemes operated by local councils. This provides councils with the long-term certainty needed for significant investment in wastewater treatment infrastructure.
	(d) No resource consent, subsequent to one issued under (c), will be issued if the discharge still does not meet the water quality standard required to support that value.	
Policy 7.C.12	Reduce the adverse effects of discharges of human sewage from existing reticulated wastewater systems, including extensions to those systems, by: (a) Preferring discharges to land over discharges to water, unless adverse effects associated with a discharge to land are greater than a discharge to water; and (b) Requiring systems to be operated, maintained and monitored in accordance with recognised industry standards; and (c) Promoting the progressive upgrading of existing systems; and (d) Requiring the implementation of appropriate: (i) Measures to progressively reduce the frequency and volume of wet weather overflows; and (ii) Measures to minimise the likelihood of dry weather overflows occurring; and (iii) Contingency measures to minimise the effects of discharges of wastewater as a result of system failure or overloading of the system; and (e) Recognising and providing for the relationship of Kāi Tahu with the water body, and having particular regard to any adverse effects on Kāi Tahu cultural and spiritual beliefs, values, and uses.	The – Discharges to land are being considered, noting that all options will have at least a portion of treated wastewater discharging to water; – All options represent significant upgrades in the existing treatment and disposal system, and will be maintained and monitored in accordance with industry standards; and – Wet weather, system failure and overload contingencies are being factored into system design. As discussed earlier, the strong relationship that mana whenua have with the Kawarau and Shotover Rivers is recognised, and is helping to shape the options being considered. Notwithstanding this, adverse effects on Kāi Tahu cultural and spiritual beliefs, values and uses will be more than minor for all options.

Appendix C – Consultation and Engagement Plan

Stakeholder Engagement Plan

QLDC Shotover WWTP Discharge Field Project

LANDPRO.

Project Name:	Shotover WWTP Disposal Field Project
Client:	Queenstown Lakes District Council
Date:	5 December 2024
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Reviewed By:	Jeremy Rusbatch
Landpro Reference:	24131
Version Number:	Final Draft for Client

1. Introduction

The purpose of this engagement plan is to set a clear framework for engaging with key stakeholders regarding the options to resolve issues with the discharge of treated wastewater from the Shotover Wastewater Treatment Plant (WWTP).

2. Project overview

The Shotover WWTP services all of the communities in the Whakatipu Basin. Upgrades are currently underway to the treatment system to improve the quality of the effluent being discharged and provide for future growth capacity in the treatment system through to the year 2048. As part of the current upgrade (MLE treatment plant duplication), the existing oxidation ponds, which currently provide approximately 20% of the current treatment capacity, will be decommissioned.

However, the current system discharges through Dose and Drain (DAD) disposal trenches, which were constructed in 2018, and are not able to cope with the current volume of discharge, nor any future increase. The condition and discharge capacity of the DAD field has been steadily declining since 2020 despite a range of remedial attempts to re-establish the capacity. The field no longer operates as designed and permanent surface water ponding is present across the field and on some occasions surface water has been able to flow out of the southern end of the field and pond outside of the fenced field area. Veolia has recently constructed a temporary overflow set-up to partially alleviate the issue, noting that this discharge is not consented.

Figure 1: View overlooking DAD field towards Kimi Ākau/Shotover and Kawarau Rivers.

Investigations into the problems have initially identified that there are likely two factors affecting the performance of the existing field.

1. Shallow groundwater and mounding hydraulically may be limiting the infiltration rates; and

1. Clogging of the infiltration trenches by sludge entering the field from the oxidation ponds and infrequent sludge blanket carryover from the clarifier has likely exacerbated the hydraulic issue of the field.

As a result, a new discharge system will be required. This will be in the form of either a discharge to land or water or a combination of both, which will require a new consent.

2.1 Existing consents

QLDC currently holds RM13.215.03.V2 to discharge treated wastewater to land. The previous discharge to water permit RM13.215.04, was surrendered once the current permit was made fully operational.

The future resource consents required will depend on the disposal option selected but will likely include both land use and discharge consents.

2.2 Work Programme

The work programme stages for the Technical Team (GHD/Landpro/QLDC) are attached in Appendix A.

Work is underway to understand the currently available baseline information for the surrounding environment and complete a gap analysis which will help inform our understanding of the impacts of current discharge and sensitivity of the environment to potential future discharge options. This will then feed into the decision-making process which includes long-list options development, MCA shortlisting of options and preferred option decision, followed by preparation of a consent application and assessment of environment effects and ultimately resource consent being issued for the preferred option.

3. Engagement overview

Engagement with stakeholders should occur early in the process to inform the development of preferred options prior to submission of a resource consent. Methods of engagement will vary depending on the role of stakeholder and the purpose of engaging with them. Early engagement will highlight areas of risk/contention, allow for consideration of potential effects at both the options shortlisting and preferred option selection stage, and 'set the scene' for the ongoing engagement/ information flow with the community during upgrade, construction and operations. This will also allow for environmental effects, not previously considered, to be identified and where possible mitigated. If appropriate, approval will be sought from potentially affected persons and submitted with the resource consent application.

Following the submission of the resource consent application, potentially affected persons will be kept informed throughout the Council consent process.

3.1 Engagement with iwi

Given the significance of the Kimi Ākau/Shotover and Kawarau Rivers to iwi, the proximity of the discharge to surface water and the cultural concerns with human effluent discharges in and around water, it will be important to ensure iwi are provided with the opportunity to input to the option decision-making process. Involving them early will enable QLDC to advance an application for resource consent that is well understood by iwi which may streamline the consenting process – QLDC will be aware of iwi concerns and can weigh these up with other factors (including affordability) as far as possible, and iwi will be aware of design constraints.

The policies within the Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008 and Kāi Tahu ki Otago Natural Resource Management Plan 2005 provides a basis for engagement with iwi, including expectations for engagement. Te Ao Marama and Aukaha are the relevant representative bodies in this instance. Notably engagement should occur early and be meaningful, targeting a level of participation that connects to existing relationships and partnerships, rather than consultation and information dissemination.

3.2 Stakeholder engagement process and identification

Table 1 identifies the stakeholders that are involved and/or potentially affected by the proposed development. Methods of engagement identified indicate the earliest point of engagement, once engagement is initiated it will continue through subsequent stages. The table identifies the timing of engagement with more specific workshop dates set out further in section 3.4 below.

Engagement with stakeholders identified in Table 1 should be tailored based on purpose. To define the purpose of engagement the following definitions are adopted, consistent with the IAP2 steps shown in Figure 2:

- **Inform** – to provide balanced and objective information to assist parties to understand the proposed development.
- **Consult** – to obtain feedback on the proposed development, including effects that have not been considered or properly examined and alternative methods of mitigation to address those effects.
- **Involve** – to work directly with stakeholders to ensure their concerns and aspirations are understood and considered in the proposed development.
- **Collaborate** – to partner with stakeholders on decisions concerning the proposed development.
- **Empower** – allow stakeholders to make decisions regarding the proposed

development.

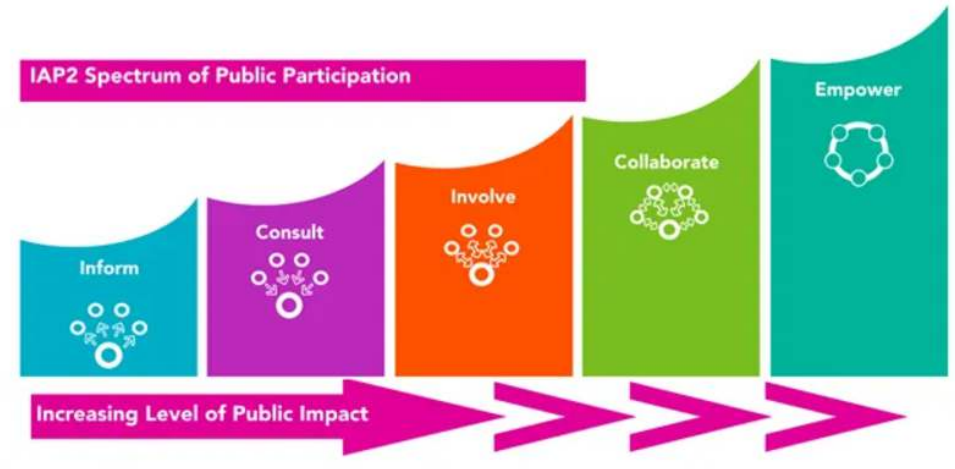


Figure 2: Levels of stakeholder engagement from International Association of Public Participation (IAP2).

Stages at which engagement may occur include:

1. *Option Development and Assessment*:
    a. *Early engagement* – to understand key values
    b. *MCA Criteria Development & Long List Option Development* – develop criteria to be used in MCA assessment, informed by early engagement
    c. *MCA Short Listing of Options* – scoring of long list options to come up with the shortlist
    d. *Short List Option Refinement and Assessment* – Input to refine shortlist options followed by preferred option selection workshop
2. *Final option consultation* - Following decision on preferred option but prior to/alongside application drafting, will inform Assessment of Effects (AEE) and potential mitigation measures.
3. *Pre-application consultation* – Utilising draft application and AEE as part of consultation.

Table 1: Identification of project stakeholders and iwi representatives/partners

	Stakeholder role in consent process	Stakeholder key contact	Level of interest	Ability to impact	Objective	First stage of engagement	Method & timing of engagement
Te Ao Marama Inc (TAMI)	Mana whenua/ Affected Person/ Partner	Riria Hakiwai, liaison to runanga	High	High	**Collaborate** Engage early with iwi to seek their guidance on cultural values and how these can be mitigated. Allows for input of cultural views into MCA decision-making. Develop partnership approach.	Early engagement (MCA and option development) (1)(a)	Initial online intro to team and understand cultural values/position. Input into MCA criteria development via online workshop. In person hui to undertake MCA scoring assessment of long-list options to create shortlist. Follow up by phone/email or in person to further examine shortlist options in more detail. In person hui to consider preferred option. Follow up by phone/email or in person to further examine preferred option during consent application preparation. Ideal outcome is understanding of proposal and neutral position before consent lodgement.
Aukaha	Mana whenua/ Affected Person/ Partner	Alex Gorrie, liaison to runaka	High	High	**Collaborate** Engage early with iwi to seek their guidance on cultural values and how these can be mitigated. Allows for input of cultural views into MCA decision-making. Develop partnership approach.	Early engagement (MCA and option development) (1)(a)	Initial online intro to team and understand cultural values/position. Input into MCA criteria development via online workshop. In person hui to undertake MCA scoring assessment of long-list options to create shortlist. Follow up by phone/email or in person to further examine shortlist options in more detail. In person hui to consider preferred option.

	Stakeholder role in consent process	Stakeholder key contact	Level of interest	Ability to impact	Objective	First stage of engagement	Method & timing of engagement
							Follow up by phone/email or in person to further examine preferred option during consent application preparation. Ideal outcome is understanding of proposal and neutral position before consent lodgement.
Queenstown Lakes District Council - Consents	Decision maker	Fiona Blight, Consents Manager	High	High	**Involve** Engage to identify key issues from the decision makers perspective. Provide input into consentability for preferred option.	Final option consultation (2)	Teams/in person meeting prior to preferred option decision (2nd quarter 2025) to get initial views from Council.
Queenstown Lakes District Council – Parks & Recreation	Affected Person	Dave Winterburn, Parks Manager	Medium	Medium	**Involve** Inform and seek their feedback on effects and potential mitigations associated with preferred option.	Final option consultation (2)	Teams/in person meeting (3rd quarter 2025). Ideal outcome is agreement to proposed works before consent lodgement.
Otago Regional Council – Consents	Decision maker	Alexandra King, Consents Manager	High	High	**Involve** Engage to identify key issues from the decision makers perspective. Provide input into consentability for preferred option.	Alongside short-list option refinement occurring (1)(d)	Teams/in person meeting prior to preferred option decision (2nd quarter 2025) to get initial views from Council.
Otago Regional	Affected Person	Jean-Luc Payan, Natural	Medium	Medium	**Involve** Inform and seek their feedback on effects	Final option consultation (2)	Teams/in person meeting (3rd quarter 2025). Ideal outcome is Affected Party Approval before consent lodgement.

	Stakeholder role in consent process	Stakeholder key contact	Level of interest	Ability to impact	Objective	First stage of engagement	Method & timing of engagement
Council - Hazards		Hazards Manager			and potential mitigations associated with preferred option.		
Department of Conservation	Affected Person	TBC	High	Medium	**Involve** Inform and seek their feedback on effects and potential mitigations associated with shortlisted options so an informed decision can be made by Council/project team on preferred option.	Alongside short-list option refinement occurring (1)(d)	Teams/in person meeting before final option decision (2nd quarter 2025) to discuss shortlisted options pros/cons and start to understand concerns that may require mitigation. Ideal outcome is Affected Party Approval before consent lodgement.
Fish and Game	Affected Person	Nigel Paragreen, Environment Officer	High	Medium	**Involve** Inform and seek their feedback on effects and potential mitigations associated with shortlisted options so an informed decision can be made by Council/project team on preferred option.	Alongside short-list option refinement occurring (1)(d)	Teams/in person meeting before final option decision (2nd quarter 2025) to discuss shortlisted options pros/cons and start to understand concerns that may require mitigation. Ideal outcome is Affected Party Approval before consent lodgement.
Heritage New Zealand Pouhere Taonga	Interested person	TBC	Medium	Medium	**Consult** Need to check for heritage sites	Pre-application consultation (3)	Email/phone (3rd quarter 2025).

	Stakeholder role in consent process	Stakeholder key contact	Level of interest	Ability to impact	Objective	First stage of engagement	Method & timing of engagement
Queenstown Airport Corporation Limited	Affected Person/ Landowner	via QLDC Property Team	Medium	Low – Medium	**Consult** Engage on potential for land discharge option on their property to identify if this is an option worth pursuing/cost involved. Inform of alternative options so aware of what is proposed and we can demonstrate how effects on them will be managed/mitigated – likely to be mostly in relation to bird strike.	Alongside short-list option refinement occurring (1)(d)	Email/phone – meeting if required (2nd quarter 2025). Ideal outcome is Affected Party Approval before consent lodgement, noting this approach may differ if the preferred option includes the use of their land.
Remarkables Park Ltd	Affecter Person/ Landowner	TBC	Medium	Low - Medium	**Consult** Engage on potential for land discharge option on their property to identify if this is an option worth pursuing/cost involved. Inform of alternative options so aware of what is proposed and we can demonstrate how effects on them will be managed.	Alongside short-list option refinement occurring (1)(d)	Email/phone – meeting if required (2nd quarter 2025). Ideal outcome is Affected Party Approval before consent lodgement, noting this approach may differ if the preferred option includes the use of their land.
Drinking water	Interested/	To determine if any	Medium	Low	**Consult**	Pre-application	Email/phone – meeting if required – late 2025. Ideal outcome is Affected

	Stakeholder role in consent process	Stakeholder key contact	Level of interest	Ability to impact	Objective	First stage of engagement	Method & timing of engagement
suppliers, including regulator Taumata Arowai	Affected Persons				Inform so aware of what is proposed and we can demonstrate how effects on them will be managed	consultation (3)	Party Approval before consent lodgement.
Jet boat operators & surface water users	Interested/ Affected Persons	TBC	Medium	Low	**Inform** Inform so aware of what is proposed and we can demonstrate how effects on them will be managed	Pre-application consultation (3)	Email/phone – meeting if required – late 2025.
Queenstown Trails Trust	Interested/ Affected Persons	TBC	Medium	Low	**Inform** Inform so aware of what is proposed and we can demonstrate how effects on them will be managed	Pre-application consultation (3)	Email/phone – meeting if required – late 2025.
Property owners on RHS Glenda Drive	Interested Persons	TBC	Low	Low	**Inform** Inform so aware of what is proposed and we can demonstrate how effects on them will be managed	Pre-application consultation (3)	Email/phone – meeting if required – late 2025.
General Public – including users of adjacent land	Interested Persons	N/A	Low - Medium	Low	**Inform** Inform to enable clear understanding by public of preferred discharge option, why it was chosen and explain what is happening ahead of lodging consent	Pre-application consultation (3)*	Website/Social media/Let's talk link for formal pre-app consultation stage – late 2025. **Progress updates throughout project as appropriate should be included online to front foot current media/public interest. Respond to enquires as appropriate via QLDC*

	Stakeholder role in consent process	Stakeholder key contact	Level of interest	Ability to impact	Objective	First stage of engagement	Method & timing of engagement
					application with ORC. Will allow us to include summary of wider public concerns and how they can be addressed in application.		*Communications Team / QLDC Project Manager*

3.3 Information requirements

Information (primarily documents) that will be used to engage with stakeholders will be prepared over the course of the project. Information packs will be provided to TAMI and Aukaha ideally 2 weeks prior to planned workshops so that feedback can be obtained from the individual Runanga.

3.4 Stakeholder engagement timeline

The current tentative dates are as follows:

Initial korero with iwi	25 November 2024	Online
MCA criteria set up	12 December 2024	Online
MCA long list scoring	19 February 2025	In person
Continued and broader engagement to refine shortlist options	February – July 2025	Various
Option selection workshop	~ July 2025	In person
Consent preparation	August – December 2025	Various

3.5 Engagement risks

Table 2 identifies the key risks associated with the proposed approach to engagement and methods to mitigate those risks.

Table 2: Engagement risks

Risk	Likelihood	Mitigation/action plan
Lack of availability for workshops	Moderate	Advise and book in workshops as early as possible. Provide sufficient information well ahead of time so that in the event of unavailability feedback can still be obtained to ensure overall process isn't held up.
Iwi partners become heavily opposed to the proposed solution and efforts to engage are not received well.	Moderate	The engagement process should be transparent and should be approached with a willingness to make changes especially through option development/decision process. All efforts to engage with the iwi should be documented so they can be addressed in hearing evidence.
Key stakeholders are opposed to the proposed solution and efforts to engage are not received well.	Moderate	The engagement process should be transparent and ensure proper consideration of mitigation measures/monitoring discussed with stakeholders for preferred option. All efforts to engage with stakeholders should be documented so they can be addressed in hearing evidence.
Disinformation spreads within the community	Moderate	All correspondence with stakeholders should be supported by an information pack that provides consistent and clear messaging supported by expert advice. Relevant information should be available to wider public via QLDC communications team as necessary.

3.6 Stakeholder Feedback

Current feedback:

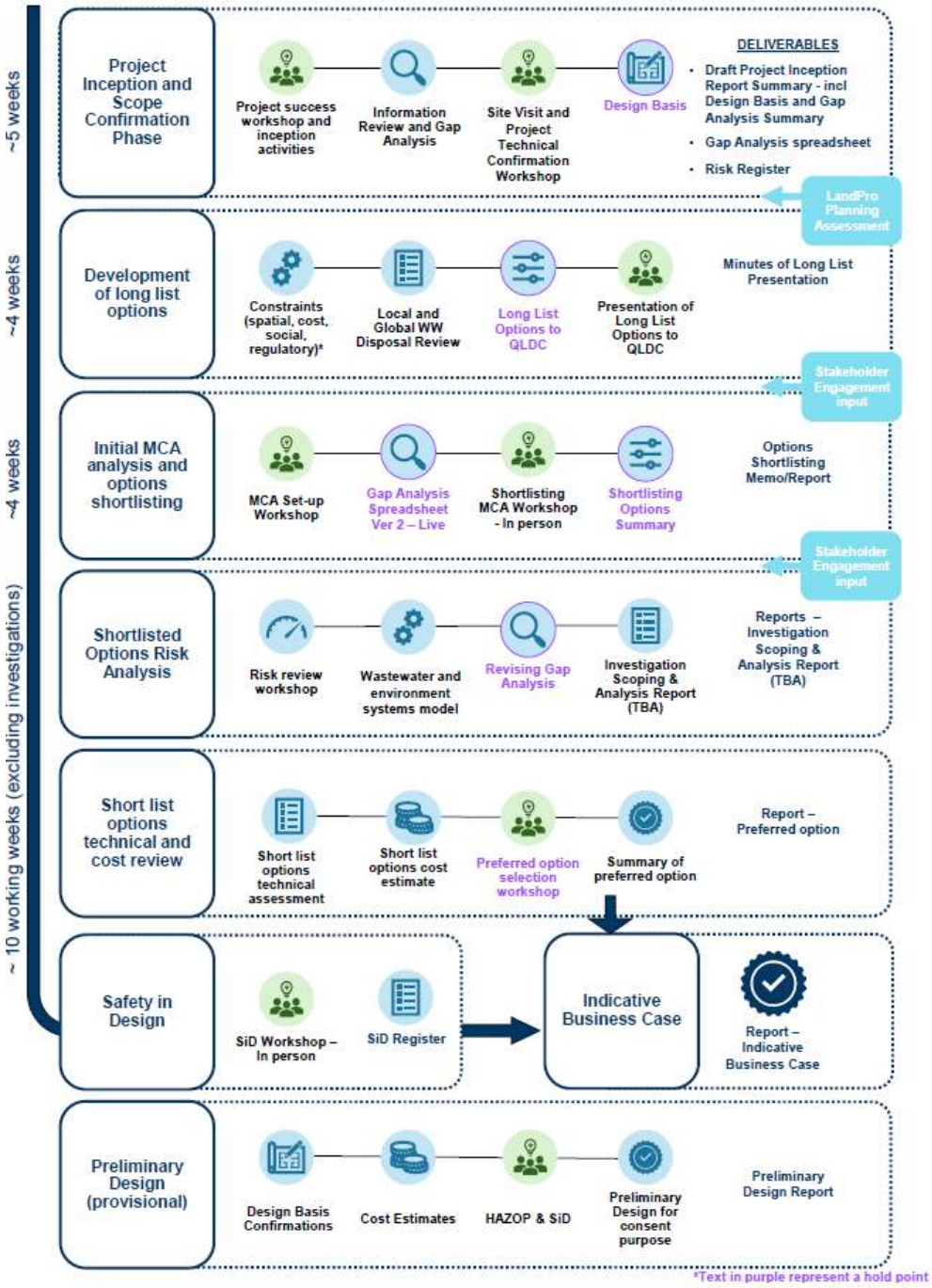
Stakeholder	Current engagement outcome and comments
Te Ao Marama Inc	Refer to iwi position statement.
Aukaha	Refer to iwi position statement.
Department of Conservation	
Fish and Game	
Heritage New Zealand Pouhere Taonga	
Queenstown Lakes District Council	
Otago Regional Council	

Queenstown Airport Corporation Limited / Remarkables Park Ltd - Landowners	
Jet boat operators	
Queenstown Trails Trust	
Property owners on RHS Glenda Drive	
Public – users of adjacent land	

3.7 Summary

This document is intended to form a working document that can up updated and added to as the engagement process develops. It needs to be scrutinised by the project team prior to being adopted.

APPENDIX A – Project Programme



Appendix D – Iwi Position Statement

SHOTOVER DISPOSAL FIELD ALTERNATIVE OPTIONS: POSITION STATEMENT OF KĀI TAHU ON SHORTLISTED OPTIONS

(This position statement has been endorsed by the seven Kāi Tahu papatipu rūnaka with interests in the Kimiākau/ Shotover and Kawarau rivers and the greater Whakātipu area.)

Cultural position on discharge of human wastes

Kāi Tahu consider the direct discharge of human waste to natural water abhorrent.

In traditional Māori knowledge, wai (water) was classified in accordance with its characteristics and ceremonial use. These categories determined how the water could or could not be used. The mixing of water from separate categories was, and still is, considered unacceptable to Māori. In this regard, wastewater which is classified as waikino (polluted water) should not be mixed with other categories of water. Instead, natural mixing of wastewater through land, or a similar environment that provides a natural buffer or transition zone is supported by Kā Rūnaka. To reiterate, the wastewater leaving a treatment plant is considered tapu (prohibited, restricted, forbidden, to be approached with caution). Treatment through natural processes in the land to reach a state of being noa (free from extensions of tapu, ordinary, unrestricted) is the preferred option.

Kāi Tahu associations with the Kimiākau/ Shotover and Kawarau rivers

The Kawarau and Kimiākau/ Shotover rivers are of great cultural significance to coastal Otago hapū as important parts of the network of ara tawhito (trails) that connected them with Lake Wakatipu/Whakatipu-wai-Māori and the greater Wakātipu/Whakātipu pounamu fields. The Kawarau River connected many ara tāwhito, and the name Kimiākau, meaning 'to look for the coast', suggests that the Kimiākau/ Shotover River was a main route to the pounamu fields on Te Tai Poutini/West Coast.

The importance of the Kimiākau/ Shotover River for both its mahika kai values and its place in the great system of ara tawhito seasonally traversed by Kāi Tahu whānui is demonstrated by the establishment, through the Ngāi Tahu Claims Settlement Act (1998), of two nohoaka entitlements along the river. One of these entitlements is located at Tucker Beach, a short distance upstream of the Shotover Delta.

The shores of the Kawarau River were a known and well-frequented moa hunting site, and weka, kākāpō, kea and tuna were also readily available here. Two pā, potentially kāika mahika kai, were located downstream near present-day Gibbston.

Position on shortlisted options for wastewater disposal

Since at least 1998 Kā Rūnaka have expressed:

- their opposition to wastewater discharges to the Kimiākau/ Shotover River;
- their preference for land-based discharge; and
- their view that the Shotover Delta is an unsuitable location for land disposal.

In respect to land-based disposal options, Kā Rūnaka support options that will use natural processes to treat the wastewater and absorb and remove contaminants. A superficial or token contact with the whenua that does not have any additional treatment effect beyond that offered by the treatment plant itself is not sufficient. In order for the mauri of the water to be fully

restored it needs to be cleaned and revitalised through interactions with the forces of nature and Papatūānuku:

- Water passes through Papatūānuku (the earth) to transform and cleanse the polluted water which feeds the surrounding biota and in turn begins to re-invigorate its mauri;
- Tāne (the Atua of the forest and all that dwells within it), uses plants, roots, micro-organisms, birds, and insects that form the natural biological processes to absorb and remove contaminants with the added benefit of significant carbon sequestration and a natural increase in biodiversity;
- Tāwhirimātea (the wind) acts to oxygenate and agitate the water; and
- Tama- nui-te-Rā (the sun) acts to add UV light.

Through the agency of Aukaha and Te Ao Marama Limited, Kā Rūnaka have provided input to the process of assessing and scoring options for disposal of wastewater from the Shotover Wastewater Treatment Plant. Specifically, Aukaha and Te Ao Marama were invited to score options in terms of three criteria:

- The disposal of treated wastewater aligns with tikaka as guided by mana whenua;
- Mō tātou, ā, mō kā uri ā muri ake nei - For us and our children after us; and
- Cultural impacts to sites of significance and access to sites for cultural activities.

As described above, any options relying on discharge to the river without effective land-based treatment are contrary to tikaka. Discharge of wastewater to the river would not uphold the intergenerational obligation to uphold the mauri of the awa and would have a significant negative impact on mahika kai values associated with the awa. Accordingly, it was concluded that such options could only be scored as "fatally flawed" from the cultural perspective.

The shortlisted options comprise:

- Discharge to the Kawarau River via depressions and former river channels in the Delta;
- Discharge via subsurface wetlands in a historical river channel in the Delta into rock-filled flow paths to the Kawarau River; or
- Disposal to land in the adjacent Frankton Flats area by either deep well injection or shallow injection. These options would not provide sufficient capacity to absorb the full wastewater volume and so could not operate independently of the subsurface wetlands option, which would be used to discharge a major portion of the modelled wastewater flow.

Kā Rūnaka understand that the subsurface wetlands would not provide substantive additional treatment of wastewater before it is discharged to the river.

Because all options rely on discharge of significant volumes of wastewater to the Kawarau River, none of them can be considered culturally appropriate.

The consideration of options has been constrained by exclusion of any solutions that do not involve continued use and expansion of the treatment plant in the Shotover Delta. Ongoing reliance on this location is of concern to Kā Rūnaka, particularly due to the proximity to the Kimiākau and Kawarau rivers and uncertainty about flood hazards arising from climate change. The position of Kā Rūnaka is that a more holistic investigation of wastewater needs and alternatives for Queenstown is required that is not constrained by continuing to rely on treatment at this location.