

31 OCT 2016

To: The Chief Executive  
Environment Southland  
Private Bag 90116  
DX20175  
Invercargill

**SUBMISSION FORM**

Submission on a Notified Application for a Resource Consent

I: BRUCE HALLIGAN (Name(s))  
of: 39 OTEPUNIKA ROAD, INVERCARGILL 9812 (Address)  
at: 03-2168133 (Phone)  (Fax) bhalligan@stra.co.nz. (E-mail)

Wish to SUPPORT / OPPOSE / submit a **NEUTRAL** submission on (circle one) the application of:Name: INVERCARGILL CITY COUNCIL, c/- MWH N.Z.

And/or Organisation: \_\_\_\_\_

Application Number: \_\_\_\_\_

Location: \_\_\_\_\_

My reasons for my submission are: (State the nature of your submission and give clear reasons. Continue on attached pages if necessary)

- 1) - I AM A LANDOWNER IN THE OTEPUNI CATCHMENT.
- 2) - THE APPLICATION AS SUBMITTED CONTAINS A MASS OF INFORMATION, BUT HAS THE FEEL OF LARGELY BEING AN EXERCISE TO JUSTIFY THE STATUS QUO, WITH LITTLE CONTENT / EMPHASIS ON INCREASED MITIGATION OF ADVERSE EFFECTS. THIS IS INTERESTING HAVING REGARD TO THE FACT THAT A 35 YEAR CONSENT IS SOUGHT (THE LONGEST POSSIBLE UNDER THE ACT) FOR A NON-COMPLYING ACTIVITY.
- 3) - I DO HOWEVER ALSO RECOGNISE THE IMPORTANCE OF, AND NECESSITY FOR, THE STORMWATER SYSTEM TO MANAGE STORMWATER AND MITIGATE INUNDATION RISK.
- 4) - AS A REGULAR USER OF THE OTEPUNI STREAM BETWEEN ROCKDALE ROAD AND BOND STREET, I REGULARLY OBSERVE (PARTICULARLY IN THE ROCKDALE TO INGLEDWOOD SECTIONS) DETERGENT-LIKE DISCHARGES. I HAVE REPORTED THESE ON OCCASION TO ENVIRONMENT SOUTHLAND. PRESUMABLY THESE EMANATE FROM INDUSTRIAL SITES SOUTH OF THEM WHICH DRAIN INTO THE STREAM FROM SEVERAL LARGE OUTFALL PIPES.
- 5) - WHILE IT COULD BE ARGUED THAT THESE SHOULD BE ADDRESSED AT SOURCE, I WOULD QUESTION WHETHER THERE IS SOME POTENTIAL TO MITIGATE ADVERSE EFFECTS AT THESE OUTFALL POINTS, SO AS TO ACHIEVE AN OVERALL IMPROVEMENT IN THE CATCHMENT.
- 6) - I CONSIDER THAT, PARTICULARLY WITH THE DURATION OF THE CONSENTS WHICH IS SOUGHT, AND THE WIDE-RANGING NATURE OF THE APPLICATION, THE APPLICATION REQUIRES CLOSE SCRUTINY AND SHOULD NOT BE SEEN AS A "RUBBER STAMP" APPROVAL

I wish the Council to make the following decision (Give precise details, including the nature of any conditions sought)

GRANTING OF THE CONSENTS SOUGHT, BUT SUBJECT TO SUITABLE CONDITIONS SO AS TO MITIGATE THE POTENTIAL FOR SIGNIFICANT ADVERSE ENVIRONMENTAL EFFECTS.

CONSIDERATION COULD BE GIVEN TO REQUIREMENTS FOR SOME FORM OF INTERCEPTION ARRANGEMENTS AT KEY DISCHARGE POINTS IN THE VARIOUS CATCHMENTS TO SEEK TO INTERCEPT DISCHARGES OF POTENTIALLY HARMFUL CONTAMINANTS SUCH AS DETERGENTS, PAINTS ETC.

WHILE I UNDERSTAND THE DESIRABILITY OF A LONG TERM CONSENT FOR INFRASTRUCTURAL ASSET MANAGEMENT, 35 YEARS SEEMS EXCESSIVE. THERE MAY WELL BE SIGNIFICANT ADVANCES IN STORMWATER TECHNOLOGY DURING THIS PERIOD, PLUS NEW CATCHMENT LIMIT-SETTING PROCESSES, WHICH WOULD SEEM TO ME TO SUPPORT A SHORTER DURATION OF CONSENT.

THANKS FOR YOUR CONSIDERATION OF THIS SUBMISSION. I WOULD BE HAPPY TO DISCUSS CONTENT FURTHER WITH THE APPLICANT.

I, am/am not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

\*If trade competitor chosen, please complete the next statement, otherwise leave blank

I, am/am not (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

MAY

I, do/do not (choose one) wish to be heard in support of my submission.

MAY

I, do/do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I have served a copy of my submission on the applicant.

Yes  No

Signed

Date

20/10/16

If you have any queries about this form or its purpose please contact the Consents Division of Environment Southland (03) 211 5115 or 0800 76 88 45.

COPY TO : INVERMORANGILL CITY COUNCIL  
c/- MWH NEW ZEALAND LIMITED  
P.O. BOX 13-052  
CHRISTCHURCH 8141

ATTENTION : JANAN DUNNING