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Draft Water and Sanitary Services Assessment May 2005

Submission of the Avon Heathcote Estuary Ihutai Trust

The Avon Heathcote Estuary Ihutai Trust thanks the City Council for the opportunity to comment on the risk assessments set out in the report titled "Draft 2005 Water and Sanitary Services Assessment".

It is the Trust's policy to be helpful and solution-oriented. We make these comments in good faith because we wish to help find a useful solution. We feel that it is vitally important that if the City is to grow it does not do so at the expense of its environment.

We have found the short time available to make a submission on the report to be very onerous for a volunteer organization. Added to that we understand the hearings are to be held immediately after the closing date for submissions. This adds unreasonable further pressures for a voluntary organization. Given the importance of water and sanitary services to the preservation of good health and the environment in the City we feel that insufficient time has been made available to make effective and useful submissions.

The report seems to have been written as a "good news" report. However in the Trust's view some of the issues behind the report warrant grave concern. We consider they present a serious challenge to achieving the expressed goal of an environmentally sustainable city.

Unfortunately some important parts of the report have understated the seriousness of the risks involved. In one part the report states that all is well when in fact the City is actually facing being in breach of one of the most environmentally-significant resource consent that it operates under.

In particular the biggest single contributor of liquid waste load to the City's environment is the current waste treatment plant outfall to the Estuary. We understand that the discharge is currently in breach of the consent conditions about 50% of the time. It will be in breach 100% of the time in October 2005 when the discharge is required to meet stricter standards (the permitted ammonia concentration is to be reduced from 30mg/l to 20 mg/l). We also understand that 80% of the ammonia is of human origin so any city growth in the period between now and the completion of the ocean outfall will make matters worse.

This very significant environmental issue does not get a mention in the report

We see this as a serious omission. Known system faults and known risks need to be included in this document so they can be addressed and budgeted for. Also so that elected representatives and the public are given an accurate picture of the risks the City services face and the options for addressing them.

Three key comments on the draft Assessment Document:

Wastewater

page15 Bullet points 4 & 5 state that nitrogen content is reduced in the trickling filters and the ponds. This has never been the case and a recent report presented to the Discharge Audit Group clearly states that at the current loading rates are too high to achieve significant ammonia reductions during treatment. Projected waste load further exacerbate the excess ammonia issue. Ammonia is a problem because it is being discharged at a concentration that is too high for fish to survive.

Environmental impacts or risks of Stormwater.

This is reported as a 'risk' in one summary and an "impact" in another. (Page 9 in a summary and page iii in the report). This paragraph also concedes river ecosystems are degraded but says if we want them repaired we will have to meet the costs. Surely halting further environmental damage should have the highest priority. Restoring degraded waterways should also be a goal for the Council.

Drinking water

Protecting drinking water from contamination needs to be done before contamination occurs. There is insufficient emphasis on this in the report. There are examples close at hand of degraded groundwater. Many shallow wells in rural areas are already contaminated rendering the water unsuitable for human consumption.

Unfortunately we do not have time to record our detailed comments on each of the above issues or on many other points in the report.

The Trust wishes to have our submission heard by a Council committee.

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CHAIRMAN

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