

Appendix I Assessment of Objectives and Policies

Objectives and policies that are of key relevance to this application are highlighted in light green

Table I-1: Benefits of Infrastructure

Reference	Provision	Comment
NPS-UDC Objective OA1	Effective and efficient urban environments that enable people and communities and future generations to provide for their social, economic, cultural and environmental wellbeing	<p>It is noted that the NPS-UDC defines an urban environment as an area of land containing or intended to contain a concentrated settlement of 10,000 people or more and any associated business land, irrespective of local authority or statistical boundaries.</p> <p>As noted in Section 4.1 of the AEE, the WWTP catchment is anticipated to grow. It is considered the provision of wastewater infrastructure is a critical element of achieving an effective and efficient urban environment. The proposed efficient use of the existing wastewater infrastructure also provides an important social and economic positive effect, as it provides the communities with economically sustainable and affordable wastewater treatment system.</p>
NPS-UDC Objective OC1	Planning decisions, practices and methods that enable urban development which provides for the social, economic, cultural and environmental wellbeing of people and communities and future generations in the short, medium and long-term,	Wastewater infrastructure is necessary to enable urban development which provides for the social, economic, cultural and environmental wellbeing of people and communities.
NPS-UDC Objective OD1	Urban environments where land use, development, development infrastructure and other infrastructure are integrated with each other	The project will ensure that wastewater infrastructure is integrated with development.
NPS-UDC Objective OD2,	Coordinated and aligned planning decisions within and across local authority boundaries	The project is necessary to provide wastewater services to significant growth areas within both the Tasman and Nelson regions. This will enable growth to occur within those areas subsequently enabling the development of anticipated growth.
NPS-UDC Policy PA3	<p>When making planning decision that affect the way and the rate at which development capacity is provided, decision-makers shall provide for the social, economic, cultural and environmental wellbeing of people and communities and future generations, whilst having particular regard to:</p> <p>(a) Providing for choices that will meet the needs of people and communities and future generations for a range of dwelling types and locations, working environments and places to locate businesses;</p> <p>(b) Promoting the efficient use of urban land and development infrastructure and other infrastructure; and Limiting as much as possible adverse impacts on the competitive operation of land and development markets</p>	<p>It is considered that the project will ensure that wastewater infrastructure is integrated with development. A 35 year duration sought for each of the consents, will enable the project to provide for future generations in the short, medium and long-term in a manner cognisant with current growth planning.</p> <p>It is considered that the project constitutes the efficient use of existing development infrastructure.</p>
NRPS Policy CO1.3.16	To recognise that some uses and developments dependent on the natural and physical resources in the coastal environment are important to the social, economic and cultural well-being of the people and the community, should be provided for within the coastal environment providing that the quality of the environment is maintained	As noted above, it is considered that the proposed efficient use of the existing wastewater infrastructure provides an important social and economic positive effect, as it provides the communities with an economically sustainable and affordable wastewater treatment system. From the assessments in sections 10, 11 and 14 of this AEE, it is considered that the quality of the environment will be maintained.
NRPS Policy WM1.3.6	To work closely with adjoining territorial authorities in order to achieve integrated waste management in the Upper South Island	The NRSBU, being a joint business unit of the Nelson City Council (NCC) and the Tasman District Council (TDC), operates the Bell Island Wastewater Treatment Plant (WWTP). It is considered that the project is consistent with this policy.
NZCPS Objective 6	<p>To enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development, recognising that:</p> <ul style="list-style-type: none"> the protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits <p>...</p>	<p>It is considered that the proposed efficient use of the existing wastewater infrastructure provides an important social and economic positive effect, as it provides the communities with economically sustainable and affordable wastewater treatment system.</p> <p>The provision of a safe WWTP eliminates the need for onsite for alternative sewage facilities for residential and business land uses in urban areas which is beneficial to health.</p> <p>It is noted also, that functionally, the existing pipe and diffuser outlet structure can only be situated in coastal marine area. Further to this, alternatives to the structure and its location have been considered in section 7 of this AEE.</p>
NZCPS Policy 6	<p>Activities in the coastal environment</p> <p>(1) In relation to the coastal environment: recognise that the provision of infrastructure, the supply and transport of energy including the generation and transmission of electricity, and the extraction of minerals are activities important to the social, economic and cultural well-being of people and communities;</p> <p>(a) recognise that the provision of infrastructure, the supply and transport of energy including the generation and transmission of electricity, and the extraction of minerals are activities important to the social, economic and cultural well-being of people and communities;</p> <p>(b) ...</p> <p>(c) ...</p> <p>...</p>	As noted above, it is considered that the proposed efficient use of the existing wastewater infrastructure provides an important social and economic positive effect, as it provides the communities with economically sustainable and affordable wastewater treatment system.

Reference	Provision	Comment
TRPS Objective 5	Maintenance of economic and social opportunities to use and develop resources in a sustainable manner	As noted above, it is considered that the proposed efficient use of the existing wastewater infrastructure provides an important social and economic positive effect, as it provides the communities with economically sustainable and affordable wastewater treatment system.
TRPS Objective 9.3	A coastal marine area in which adverse effects from activities, including structures, physical modification, or occupation, are avoided, remedied or mitigated	The environmental effects of the discharge and the existing pipe and discharge structure are considered to be appropriately mitigated. It is considered that the project is consistent with this objective.
TRPS Objective 10.4	Minimised risks of contamination of the environment arising from the storage, treatment or disposal of all forms of waste	This objective is addressed in details in Table I-2 below, with regards to the discharge of treated wastewater. It is considered that the project is consistent with this objective.
TRPS Policy 9.3	The Council will provide for activities in the coastal marine area, while avoiding, remedying or mitigation their adverse effects on: (i) Natural character (ii) (iii) ... (iv) ... (v) ... (vi) ... (vii) ... And whether these effects cab be avoided, remedied or mitigated.	The environmental effects of the discharge and the existing pipe and discharge structure are considered to be appropriately mitigated. It is considered that the project is consistent with this policy.
TRPS Policy 10.8	The Council will seek to minimise the generation of all forms of wastes, particularly hazardous wastes	As discussed above, the continued provision of a reticulated wastewater collection system and the WWTP, eliminates the need for individual onsite treatment where reticulation is available. Therefore reducing potential adverse effects from these schemes, as the WWTP provides a safe and efficient means to treating wastewater. Treated wastewater is not hazardous waste.
TRMP Objective 6.3.2.1	Sustainable urban growth that is consistent with the capacity of services and has access to the necessary infrastructure such as water supply, roading, wastewater and stormwater systems.	As discussed above, it is considered that the project will ensure that wastewater infrastructure is integrated with development. A 35 year duration will enable the project to provide for future generations in the short, medium and long-term in a manner cognisant with current growth planning.
TRMP 6.3.3.1	To ensure that utilities and services are adequate to avoid, remedy, or mitigate adverse effects of urban development and population growth on both existing and future urban areas.	The continued provision of a reticulated wastewater collection system and the WWTP, eliminates the need for individual onsite treatment where reticulation is available. Therefore reducing potential adverse effects from these schemes.
TRMP Objective 8.1.2	The maintenance and enhancement of public access to and along the margins of lakes, rivers, wetlands and the coast, which are of recreational value to the public	Regular monitoring reports are proposed as part of the suite of volunteered consent conditions. Public access to the coast is not impeded by the existing pipe and discharge structure. It is considered that the project is consistent with this policy.
TRMP Policy 8.1.3.3	To avoid, remedy, or mitigate the adverse effects on public access cause by structures, buildings, and activities in or adjoining water bodies or the coastal marine area.	As part of this project, consent is being sought as a controlled activity for the existing pipe and diffuser structure. It is considered that the adverse effects of the structure, and its occupation can be satisfactorily mitigated through volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly. No effects on public access from the discharge of treated wastewater are anticipated. It is considered that the project is consistent with this policy.
NRMP Objective DO3.2	The highest practical level of waste reduction, reuse, recovery, and recycling, and the management of the actual and potential effects arising from the disposal of waste materials, to ensure that any potential adverse environmental effects are avoided, remedied or mitigated	As discussed above, the continued provision of a reticulated wastewater collection system and the WWTP, eliminates the need for individual onsite treatment where reticulation is available. Therefore reducing potential adverse effects from these schemes, as the WWTP provides a safe and efficient means to treating wastewater.
NRMP Policy DO3.2.1	The generation of waste should be minimised wherever possible. Residue waste, including hazardous substances, should be disposed of in an environmentally acceptable manner	As discussed above at objective DO3.2 it is considered that the project is consistent with this policy. It is not proposed to dispose of hazardous substances as part of this application.

Reference	Provision	Comment
NRMP Policy CM1.4	Activities within the Coastal Marine Area involving the use, storage, and transport, of hazardous substances should be managed or controlled, so as to minimise: a) the risk of a spill or leakage occurring; and b) the potential for adverse effects in the event of spill or leakage	The WWTP Operation and Maintenance Manual (O&M Manual) was published in August 2015 and covers the ongoing operation and maintenance of the WWTP. The O&M manual sets out requirements about health and safety, staffing, and response to abnormal events. It is considered that the project is consistent with this policy.
NRMP Policy CM1.5	Hazardous substances should not be disposed of in the Coastal Marine Area	It is not proposed to dispose of hazardous substances in to the Coastal Marine Area.
NRMP Policy CM4.5	Activities within the Coastal Marine Area should: (a) ... (b) ... (c) allow people to have safe access to and along the Coastal Marine Area, and (d) allow people to make use of the foreshore and coastal waters for contact recreation; and (e) ... (f) ...	The discharge of treated wastewater and the existing pipe and diffuser structure are not considered to impact on people's access to and use of the coastal marine area. The discharge (under normal conditions) is unlikely to have a significant adverse effect on the suitability of areas outside the mixing zone for contact recreation. Further, no FIB concentration samples downstream of the mixing zone has exceeded the guidelines for bathing-water criteria (for either enterococci or, in the case of the ANZECC guidelines, faecal coliforms).

Table I-2: Effects on Water Quality

Reference	Provision	Comment
NZCPS Policy 21	Enhancement of water quality Where the quality of water in the coastal environment has deteriorated so that it is having a significant adverse effect on ecosystems, natural habitats, or water based recreational activities, or is restricting existing uses, such as aquaculture, shellfish gathering, and cultural activities, give priority to improving that quality by: (a) identifying such areas of coastal water and water bodies and including them in plans; (b) including provisions in plans to address improving water quality in the areas identified above; (c) where practicable, restoring water quality to at least a state that can support such activities and ecosystems and natural habitats; (d) requiring that stock are excluded from the coastal marine area, adjoining intertidal areas and other water bodies and riparian margins in the coastal environment, within a prescribed time frame; and (e) engaging with tāngata whenua to identify areas of coastal waters where they have particular interest, for example in cultural sites, wāhi tapu, other taonga, and values such as mauri, and remedying, or, where remediation is not practicable, mitigating adverse effects on these areas and values.	Based on monitoring set out in section 8.4.4 of the AEE it is considered that Waimea Inlet is in a generally healthy ecological state compared to a number of other New Zealand estuaries. It is noted however that Waimea Inlet has been considerably impacted by extensive habitat loss/modification and sedimentation. Localised areas of nutrient enrichment are present, and more widespread faecal bacteriological contamination occurs in regions of freshwater inflows, largely from agricultural sources within the estuary catchment The TRMP and NRMP identify areas where coastal water quality is required to meet a minimum standard, for example contact recreation. Section 10 of this AEE states that the discharge (under normal conditions) is unlikely to have a significant adverse effect on the suitability of areas outside the mixing zone for contact recreation. Overall, monitoring results indicate that the bacterial component of water quality of inner Tasman Bay can be affected more by catchment runoff rather than by contributions from the Bell Island wastewater discharge. No FIB concentration samples downstream of the mixing zone has exceeded the guidelines for bathing-water criteria (for either enterococci or, in the case of the ANZECC guidelines, faecal coliforms). Engagement with tanagta whenua is addressed in Table I-3 It is considered that the project is consistent with this policy.
NZCPS Policy 22	Sedimentation (1) Assess and monitor sedimentation levels and impacts on the coastal environment; (2) Require that subdivision, use, or development will not result in a significant increase in sedimentation in the coastal marine area, or other coastal water. (3)	Monitoring of sediments and the impacts on the coastal environment will be detailed in a full set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly. It is considered that the project is consistent with this policy.
NZCPS Policy 23	Discharge of contaminants (1) In managing discharges to water in the coastal environment, have particular regard to: (a) the sensitivity of the receiving environment; (b) the nature of the contaminants to be discharged, the particular concentration of contaminants needed to achieve the required water quality in the receiving environment, and the risks if that concentration of contaminants is exceeded; and (c) the capacity of the receiving environment to assimilate the contaminants; and (d) avoid significant adverse effects on ecosystems and habitats after reasonable mixing;	A detailed assessment of effects has been undertaken and each of the matters in which particular regard is set out below: (1)(a) Section 8.4.1 of the AEE sets out a full summary of the sensitivity of the receiving environment. In summary the Waimea Inlet is a shallow, bar-built estuary. There are ten islands located within the inlet, which contributes significantly to the considerable habitat heterogeneity. The tidal compartment is largely drained with each ebbing tide, resulting in a relatively rapid flushing rate.

Reference	Provision	Comment
	<p>(e) use the smallest mixing zone necessary to achieve the required water quality in the receiving environment; and</p> <p>(f) minimise adverse effects on the life-supporting capacity of water within a mixing zone.</p> <p>(2) In managing discharge of human sewage, do not allow:</p> <p>(a) discharge of human sewage directly to water in the coastal environment without treatment; and</p> <p>(b) the discharge of treated human sewage to water in the coastal environment, unless:</p> <p>(i) there has been adequate consideration of alternative methods, sites and routes for undertaking the discharge; and</p> <p>(ii) informed by an understanding of tāngata whenua values and the effects on them.</p> <p>(3) Objectives, policies and rules in plans which provide for the discharge of treated human sewage into waters of the coastal environment must have been subject to early and meaningful consultation with tāngata whenua.</p> <p>(4) In managing discharges of stormwater take steps to avoid adverse effects of stormwater discharge to water in the coastal environment, on a catchment by catchment basis, by:</p> <p>(a) avoiding where practicable and otherwise remedying cross contamination of sewage and stormwater systems;</p> <p>(b) reducing contaminant and sediment loadings in stormwater at source, through contaminant treatment and by controls on land use activities;</p> <p>(c) promoting integrated management of catchments and stormwater networks; and</p> <p>(d) promoting design options that reduce flows to stormwater reticulation systems at source</p> <p>(5) In managing discharges from ports and other marine facilities:</p> <p>(a) require operators of ports and other marine facilities to take all practicable steps to avoid contamination of coastal waters, substrate, ecosystems and habitats that is more than minor;</p> <p>(b) require that the disturbance or relocation of contaminated seabed material, other than by the movement of vessels, and the dumping or storage of dredged material does not result in significant adverse effects on water quality or the seabed, substrate, ecosystems or habitats;</p> <p>(c) require operators of ports, marinas and other relevant marine facilities to provide for the collection of sewage and waste from vessels, and for residues from vessel maintenance to be safely contained and disposed of; and</p> <p>(d) consider the need for facilities for the collection of sewage and other wastes for recreational and commercial boating.</p>	<p>(1)(b) The discharge is for treated wastewater, past consent conditions have required monitoring for nutrients (species of nitrogen and phosphorus) and FIB. Particular concentrations are discussed in detail in Appendix C. A range of mitigation measures are proposed which will be detailed in a full set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly.</p> <p>(1)(c) Monitoring has not found any evidence of nutrient enrichment of the sediments or water column of eastern Waimea Inlet or adjacent areas of Tasman Bay because of the discharge. All of the monitoring studies from 2001 to 2016 have concluded that increases in nutrient concentrations in the receiving waters are, as predicted, confined to the mixing zone. No ecological effects from nutrient enrichment, such as changes in phytoplankton community composition, have been recorded outside the mixing zone. Monitoring has shown the concentrations of ammonia in the receiving environment to be well below guidelines for protection of marine life.</p> <p>(1)(d) ecosystems and habitats are addressed below in Table I-5.</p> <p>(1)(e) A 250 metre mixing zone is proposed, as per the current consent. Originally The mixing zone proposed (1994) for the outfall was the sector of a circle (pie slice) of 500-m radius extending downstream from the outfall. The radius of the mixing zone was subsequently reduced to 250 m in the consent conditions. Present channel morphology in the eastern Inlet is similar to that in 1994 and, consequently, the mixing zone is still likely to be valid. The absence of any clear relationship between concentrations of nutrients or faecal indicator bacteria and distance from the outfall suggests that mixing is very rapid and concentrations reduce to background levels within a short distance.</p> <p>(1)(f) With regard to effects within the mixing zone, elevated concentrations of faecal coliforms and/or enterococci have occurred within the mixing zone. However, on some occasions the highest values for FIB were recorded out in Tasman Bay, suggesting that the wastewater outfall is not a major source of bacterial contamination relative to other sources in the area and is therefore not considered significant.</p> <p>(2)(a) the discharge involves treated wastewater and not the direct discharge of untreated human sewage;</p> <p>(2)(b)(i) an adequate consideration of alternatives has been undertaken in section 7 of this AEE. In summary other options included land based treatment within five km of the plant. Options for beneficial reuse of treated wastewater were also considered</p> <p>(2)(b)(ii) iwi authorities on behalf tāngata whenua have been consulted during the preparation of the resource consent application. Iwi have also prepared a CEA which sets out the effects of the project on cultural values. This is summarised in section 15 of the AEE.</p> <p>It is considered that the project is consistent with this policy.</p>
TRPS Objective 9.1	Adequate information on the resources, processes and values of the coastal environment to support sustainable management decisions, and decisions which acknowledge the level of uncertainty in the information available for assessing policy and consent options in the coastal environment	<p>Detailed assessments on processes and values of the coastal environment have been undertaken as part of this consent application. These are summarised in this AEE from sections 10 - 15. Detail reports are attached in the appendices.</p> <p>It is considered that this project is consistent with this objective and adequate information has been provided.</p>
TRPS Objective 9.7	Maintenance and enhancement of coastal water quality to provide for the needs of marine ecosystems and for sustainable public uses and values.	<p>It is considered that coastal water quality will be maintained for the needs of marine ecosystems and for sustainable public uses and values. Section 10 of the AEE states that average daily discharge volumes are predicted to increase by 20 per cent over the present value over the next 35 years. This is not expected to affect concentrations of contaminants, including nutrients and toxicants, in the wastewater or in the receiving environment. Consequently, the toxicity of the discharge is not likely to increase.</p> <p>However contaminant loads will increase and persistent contaminants could potentially accumulate in the receiving environment. In the case of metals and organic matter in sediments in Waimea Inlet and inner Tasman Bay, monitoring data do not indicate that the predicted future increases in loading are likely to produce adverse environmental effects.</p>

Reference	Provision	Comment
		<p>Recent hydrodynamic modelling suggests that it is unlikely that concentrations of contaminants will increase progressively over time due to incomplete flushing from Waimea Inlet.</p> <p>Contact recreation uses have been discussed above.</p> <p>It is considered that the project is generally consistent with this objective.</p>
NRPS Policy CO1.3.6	To classify all coastal waters, having particular regard to existing water quality, community expectation of water quality, values associated with particular areas, and existing and future point and non-point discharges to coastal waters	<p>As directed by this policy, the NRMP (and TRMP) identify areas where coastal water quality is required to meet a minimum standard, for example contact recreation.</p> <p>Section 10 of this AEE states that the discharge (under normal conditions) is unlikely to have a significant adverse effect on the suitability of areas outside the mixing zone for contact recreation. Overall, monitoring results indicate that the bacterial component of water quality of inner Tasman Bay can be affected more by catchment runoff rather than by contributions from the Bell Island wastewater discharge.</p> <p>No FIB concentration samples downstream of the mixing zone has exceeded the guidelines for bathing-water criteria (for either enterococci or, in the case of the ANZECC guidelines, faecal coliforms).</p> <p>It is considered that the project is consistent with this policy.</p>
NRPS Objective RM1.2.1	Sufficient monitoring to provide information on the state of the environment, to identify trends in it, to establish confidence in the outcome of resource management decisions	<p>Regular monitoring reports are proposed and will be detailed in a full set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly.</p> <p>It is considered that the project is consistent with this objective.</p>
NRPS Objective WA.1.2.2	The maintenance and enhancement of coastal water quality to protect fishery, fish spawning and aquatic ecosystems and, in specific areas, to protect shellfish gathering, contact recreation and cultural and spiritual values	<p>This objective is addressed above at Objective 9.7</p> <p>It is generally considered that the project is consistent with this objective.</p>
NRPS Policy WA1.3.3	To control point discharges through the use of resource consents and appropriate conditions in order to ensure that water quality classifications are met and sustained.	<p>As discussed in Policy CO1.3.6 above, section 10 of the AEE states is unlikely to have a significant adverse effect on the suitability of areas outside the mixing zone for contact recreation.</p> <p>A range of mitigation measures are proposed which will be detailed in a full set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly. This will ensure water quality classifications and guidelines are met.</p>
TRMP Objective 23.2.2	A coastal marine area in which public safety, people's property, and the environment, are free of adverse effects from hazardous substances.	The disposal of hazardous substances in the coastal marine area is not proposed in this application.
TRMP Policy 23.2.3.3	To prevent the disposal of any hazardous substance in the coastal marine area.	The disposal of hazardous substances in the coastal marine area is not proposed in this application.
TRMP Policy 23.2.3.4	To require contingency plans to be prepared and implemented for any accidental discharge of any hazardous substance into the coastal marine area arising from its storage, use or transport.	<p>The O&M Manual covers the ongoing operation and maintenance of the WWTP. The O&M manual sets out requirements about health and safety, staffing, and response to abnormal events.</p> <p>It is considered that the project is consistent with this policy.</p>
TRMP Objective 35.1.2	The discharge of contaminants into the coastal marine area in such a way that avoids, remedies, or mitigates adverse effects while: (a) maintaining existing water quality; and (b) enhancing water quality where existing quality is degraded for natural and human uses or values.	<p>As discussed above at objective 9.7 it is considered that the project will maintain existing water quality. A range of mitigation measures are proposed which will be detailed in a full set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly.</p> <p>As discussed above at Policy 21 of the NZCPS, the coastal water quality is not considered to be degraded for natural and human values.</p> <p>It is considered that the project is consistent with this policy.</p>
TRMP Policy 35.1.3.2	To control the effects of discharges of contaminants so that, in combination with other contaminant discharge effects, they enable the relevant water classification standards to be complied with.	As discussed above, section 10 of this AEE states that the discharge (under normal conditions) is unlikely to have a significant adverse effect on the suitability of areas outside the mixing zone for contact recreation.

Reference	Provision	Comment
TRMP Policy 35.1.3.4	To ensure that water quality is not degraded where the existing water quality is the same or higher than the relevant water classification.	<p>No FIB concentration samples downstream of the mixing zone has exceeded the guidelines for bathing-water criteria (for either enterococci or, in the case of the ANZECC guidelines, faecal coliforms).</p> <p>As discussed above an assessment against the contact recreation standard was undertaken. Section 10 of this AEE states that the discharge (under normal conditions) is unlikely to have a significant adverse effect on the suitability of areas outside the mixing zone for contact recreation. Overall, monitoring results indicate that the bacterial component of water quality of inner Tasman Bay can be affected more by catchment runoff rather than by contributions from the Bell Island wastewater discharge.</p> <p>No FIB concentration samples downstream of the mixing zone has exceeded the guidelines for bathing-water criteria (for either enterococci or, in the case of the ANZECC guidelines, faecal coliforms).</p>
TRMP Policy 35.1.3.5	Adverse effects of discharges into the coastal marine area, including adverse effects of point source discharges on their own or in combination with other point source discharges should, as far as practicable, be avoided. Where complete avoidance is not practicable, the adverse effects should be mitigated and provision made for remedying those effects, to the extent practicable.	<p>It is considered that the adverse effects of the discharge, from the discharge diffuser structure (being a point source discharge) can be mitigated through consent conditions (a full set of volunteered consent conditions are currently being prepared and will be provided to the consent authority shortly). The discharge to the Waimea Inlet is considered to be the Best Practicable Option.</p> <p>The effects of the discharge are discussed above. It is noted that discharge structure itself is a controlled activity.</p> <p>It is considered that the project is consistent with this policy.</p>
TRMP Policy 35.1.3.6	To ensure that existing water quality is not degraded after reasonable mixing as a result of any discharge of contaminants into water and to take into account the following criteria when determining what constitutes reasonable mixing: (a) the depth, water circulation patterns and tidal flow characteristics of the receiving water, including the nature and extent of mixing which may occur and the assimilative capacity of the water; (b) the extent of the mixing zone and the likely adverse effects on aquatic life and ecosystems within the mixing zone; (c) the characteristics of the discharge, including the presence of toxic constituents; (d) the classification of the water; provided that the inter-tidal areas are excluded from any mixing zone unless	<p>As discussed above, each of the following criteria have been addressed in detail in Section 10 of this AEE. Specifically:</p> <p>(a) the tidal compartment of the Waimea is largely drained with each ebbing tide, resulting in a relatively rapid flushing rate.</p> <p>(b) A 250 metre mixing zone is proposed, as per the current consent. Originally the mixing zone proposed (1994) for the outfall was the sector of a circle (pie slice) of 500-m radius extending downstream from the outfall. The radius of the mixing zone was subsequently reduced to 250 m in the consent conditions. Present channel morphology in the eastern Inlet is similar to that in 1994 and, consequently, the mixing zone is still likely to be valid. The absence of any clear relationship between concentrations of nutrients or faecal indicator bacteria and distance from the outfall suggests that mixing is very rapid and concentrations reduce to background levels within a short distance.</p> <p>(c) It is noted that the concentrations of EOCs measured in the effluent of the WWTP are considerably lower than those recognised to represent a risk to freshwater and marine organisms. This suggests EOCs represent a negligible risk to aquatic organisms in the receiving environment. In addition, the effluent will be subject to dispersion and dilution upon discharge to the environment, which would further reduce the concentrations of these EOCs</p> <p>(d) As addressed above, assessments have been undertaken against the contact recreation class.</p> <p>It is considered that the project is consistent with this policy.</p>
TRMP Policy 35.1.3.7	To take into account the following factors in determining the significance of actual or likely adverse effects on the receiving water of or from contaminant discharges: (a) Any water classification. (b) Existing water quality of the receiving water. (c) The sensitivity and significance of the aquatic life or ecosystem. (d) The extent of the water adversely affected. (e) The magnitude, frequency and duration of the adverse effect, including any cumulative effect as a result of the discharge. (f) The range and intensity of uses and values of the water. (g) The conflicts between uses and values of the water. (h) The nature of the risks of the adverse effect. Any relevant national or international water quality guideline or standard.	<p>A numbers of factors in this policy have already been addressed above. The remaining factors are addressed here:</p> <p>...</p> <p>(c) is addressed in Table I-5</p> <p>(d) with regard to cumulative effects, section 10.2.3 of this AEE notes the major nutrient input to Tasman Bay was from oceanic sources, however inputs from the Waimea Inlet were likely to contribute to localised enrichment of Tasman Bay in the vicinity of the outwelling estuarine plume. It was noted however that there is no indication that the cumulative level of enrichment outside the mouth of the Waimea Inlet would result in adverse environmental impacts. Cawthron also re-iterated that assessments indicate that increases in the nutrient concentrations in the receiving water from the discharge are confined to the mixing zone.</p> <p>...</p>

Reference	Provision	Comment
		It is considered that the project is consistent with this policy.
TRMP Policy 35.1.3.8	To avoid the discharge of untreated wastewater to the coastal marine area unless it better meets the purpose of the Act than disposal to land and there has been consultation with the tangata whenua and with the community generally	It is not proposed to discharge untreated wastewater into the coastal marine area. Consultation has been undertaken with key stakeholders and iwi authorities as set out in section 18 of this AEE. It is considered that the project is consistent with this policy.
TRMP Policy 35.1.3.11	To promote and advocate development of site contingency plans to avoid, remedy or mitigate the likely adverse effects of any emergency discharges or other accidental spills in the coastal marine area	The O&M Manual covers the ongoing operation and maintenance of the WWTP. The O&M manual sets out requirements about health and safety, staffing, and response to abnormal events. It is considered that the project is consistent with this policy.
TRMP Policy 35.1.3.12	To ensure that land use and discharge activities, particularly those involving hazardous substances, are carried out having regard to contingency planning measures appropriate to the scale and nature of any discharge or potential discharge and the risk to the environment for any accidental discharge of any contaminant that may result in connection with the activity.	The O&M Manual covers the ongoing operation and maintenance of the WWTP. The O&M manual sets out requirements about health and safety, staffing, and response to abnormal events. It is considered that the project is consistent with this policy
NRMP Objective CM4	The maintenance and enhancement of amenity values within the Coastal Marine Area	Amenity values have been assessed in the natural character Table I-3. In particular, assessing contact recreation, bathing water quality and experiential attributes.
NRMP Objective CM6	Maintenance and enhancement of the quality of Nelson's coastal water.	This objective is addressed above, specifically at objective 9.7
NRMP Objective DO7.2	Maintenance and enhancement of the quality of Nelson's coastal water at or to a level which safeguards its life supporting capacity is safe for contact recreation and for gathering and consumption of seafood	This objective has been addressed above at Objective 9.7 It is considered that the project is generally consistent with this objective.
NRMP Policy CM1.6	Opportunities to restore or enhance the life-supporting capacity of the Coastal Marine Area should be identified and, where practicable, acted upon.	No opportunities have been identified through the preparation of this application to enhance the life-supporting capacity, this is not to say that opportunities could be identified in the future, through regular monitoring, or review, when new technology becomes available. Potential beneficial reuse of treated wastewater may be a further options to be investigated in the future. It is considered that the project is consistent with this policy.
NRMP Policy CM4.1	Activities within the Coastal Marine Area should avoid significant adverse effects on amenity values and public safety	As discussed in Table I-3, it is considered that there will be no significant adverse effects on amenity values from the discharge of treated wastewater or the occupation of the existing pipe discharge structure in the Waimea Inlet.
NRMP Policy CM6.2	Coastal marine water quality standards shall be managed for the purposes set out in the following water quality classes and associated standards: a) Fisheries, fish spawning, aquatic ecosystem, and aesthetic purposes, Class: FEA, Area of application: to the entire Coastal Marine Area; or b) Contact recreation purposes, Class: CR, Area of application: generally 200 metres seaward of mean high water springs within the areas identified as "Contact Recreation Overlay" on Planning Map A1; or c) Shell fish gathering purposes, Class: SG, Area of application: the area identified as "Shell Fish Gathering Overlay" on Planning Map A1, which encloses a zone extending from the 10m-40m depth contour in Tasman Bay; or d) Cultural purposes, Class: C, Area of application: Delaware Inlet (refer Planning Map A1, 'Cultural Overlay').	This policy has been addressed above. It is noted that assessments have been undertaken against the contact recreation purpose class. It is considered that the project is consistent with this policy.
NRMP Policy CM6.3	Discharges to coastal water should not, after reasonable mixing, result in a breach of classification standards or a reduction in water quality and the discharge should not (either by itself or in combination with other discharges) give rise to any significant adverse effects on habitats, feeding grounds or ecosystems.	Section 10 of the AEE states that the discharge (under normal conditions) is unlikely to have a significant adverse effect on the suitability of areas outside the mixing zone for contact recreation. Overall, monitoring results indicate that the bacterial component of water quality of inner Tasman Bay can be affected more by catchment runoff rather than by contributions from the Bell Island wastewater discharge. No FIB concentration samples downstream of the mixing zone has exceeded the guidelines for bathing-water criteria (for either enterococci or, in the case of the ANZECC guidelines, faecal coliforms). It is considered that the project is consistent with this policy.
NRMP Policy CM6.4	In considering what constitutes a "reasonable mixing zone", in any particular situation, account will be taken of: a) the purposes for which the water is managed, and b) the sensitivity of the receiving environment (i.e. available dilution and dispersal and the proximity of areas valued for ecological, recreational, cultural, shellfish gathering or commercial fishing reasons), and c) the nature of the discharge including contaminant type, concentration and volume, and d) the location and design of the proposed outfall and the potential for improving the same, and	A numbers of factors in this policy have already been addressed above at Policy 35.1.3.6. The remaining factors are addressed here: d) treated wastewater will be discharge through the existing pipeline and diffuser. ...

Reference	Provision	Comment
	<p>e) the proposed method of treatment and the potential for improving that method, and</p> <p>f) the need to confine any significant adverse effects to the mixing zone, and</p> <p>g) the desirability of keeping the size of the mixing zone as small as possible, and of keeping it away from the inter tidal area.</p>	<p>g) as noted above, the mixing zone has been reduced from 500metres to the 250 metres through previous consent conditions, keeping the mixing zone as small as possible.</p> <p>It is considered that the project is consistent with the policy</p>
NRMP Policy CM6.5	<p>When considering new proposals or applications to discharge contaminants directly to water, or reviewing existing discharges, matters to be taken into account include:</p> <p>a) the water quality classification for the receiving environment, and</p> <p>b) the total contaminant load (composition/concentration/flow rate) of the discharge, and</p> <p>c) the presence or absence of toxic constituents, and the potential for bio- accumulative or synergistic effects, and</p> <p>d) the assimilative capacity (including available dilution and dispersal) of the water and the existing water quality, and</p> <p>e) actual or potential uses of the water body and the degree to which the needs of other water users are, or may be, compromised, and</p> <p>f) scenic, aesthetic, amenity, recreational and commercial fisheries values, and</p> <p>g) the cultural and spiritual values of tāngata whenua, and</p> <p>h) the actual or potential risk to human health from the discharge.</p>	<p>A numbers of factors in this policy have already been addressed above. The remaining factors are addressed here:</p> <p>g) cultural and spiritual values are addressed in Table I-4</p> <p>h) A quantitative microbiological risk assessment (QMRA) has been carried out to determine the potential risk of illness associated with the recreational uses of the receiving water. This is summarised at section 10.3 of this AEE. The QMRA concluded that the existing level of treatment is sufficient to reduce the public health risk levels to below the No Observable Adverse Effect Level (NOAEL) for primary contact recreation, secondary contact recreation and shellfish gathering.</p> <p>It is considered that the project is consistent with this policy</p>
NRMP Policy CM6.7	<p>The discharge of treated human sewage directly into coastal water, without passing through land, should only be permitted where:</p> <p>a) it better meets the purpose of the Act than disposal onto land; and</p> <p>b) there has been consultation with tangata whenua in accordance with tikanga Maori; and</p> <p>c) there has been consultation with the community generally, and</p> <p>d) marine water quality standards are not breached as a result of the discharge, and</p> <p>e) the method of treatment prior to discharge adopts the best practicable option.</p>	<p>In section 7 of this AEE, alternatives to the discharge of treated wastewater to the Waimea Inlet have been considered in detail. This included potentially discharging to land within 5 km of the WWTP. The likely additional costs of treating and discharging treated wastewater to land is considered prohibitive and precludes this being a practicable option, in addition to other constraints on existing areas of land potentially suitable such as high levels of nitrate in groundwater and proximity to sensitive land uses.</p> <p>Consultation has been undertaken with key stakeholders and iwi authorities as set out in section 18 of this AEE.</p> <p>Water classification standards have been addressed above. The discharge of treated wastewater to the Waimea Inlet is considered the best practicable option.</p> <p>It is considered that the project is consistent with this policy.</p>
NRMP Policy CM6.13	<p>Contingency plans and response procedures should be developed and other measures adopted to reduce the risks, and possible effects, of any spillage or emergency discharge of environmentally damaging substances to the Coastal Marine Area.</p>	<p>This policy is discussed above at policy 35.1.3.11.</p>
NRMP Policy DO7.2.1	<p>Discharges of contaminants to water or land within the coastal environment should not, after reasonable mixing, result in a breach of classification standards or a reduction in water quality and the discharge should not (either by itself or in combination with other discharges) give rise to any significant adverse effects on habitats, feeding grounds or ecosystems either in the Coastal Marine Area or on land.</p>	<p>This policy has been addressed above at Policy CM6.3. It is considered that the project is consistent with this policy.</p>

Table I-3: Effects on Natural Character

Reference	Provision	Comment
NZCPS Objective 2	<p>To preserve the natural character of the coastal environment and protect natural features and landscape values through:</p> <ul style="list-style-type: none"> recognising the characteristics and qualities that contribute to natural character, natural features and landscape values and their location and distribution; identifying those areas where various forms of subdivision, use, and development would be inappropriate and protecting them from such activities; and encouraging restoration of the coastal environment. 	<p>Clause (c) of Policy 14 seeks that where practicable, in degraded areas of the coastal environment require restoration or rehabilitation. Possible approaches may include reducing or eliminating discharges of contaminants.</p> <p>As noted in Policy 13(2) of the NZCPS, natural character is not the same as natural features and landscapes or amenity values and may include matters such as:</p> <ul style="list-style-type: none"> natural elements, processes and patterns; biophysical, ecological, geological and geomorphological aspects; natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; the natural movement of water and sediment; the natural darkness of the night sky; places or areas that are wild or scenic;
NZCPS Objective 4	<p>To maintain and enhance the public open space qualities and recreation opportunities of the coastal environment by:</p> <p>recognising that the coastal marine area is an extensive area of public space for the public to use and enjoy;</p>	
NZCPS Policy 1	<p>Extent and characteristics of the coastal environment</p> <p>(1) Recognise that the extent and characteristics of the coastal environment vary from region to region and locality to locality; and the issues that arise may have different effects in different localities.</p> <p>(2) Recognise that the coastal environment includes:</p> <p>(a) ...</p>	

Reference	Provision	Comment
NZCPS Policy 14	<p>Restoration of natural character</p> <p>Promote restoration or rehabilitation of the natural character of the coastal environment, including by :</p> <p>(a) identifying areas and opportunities for restoration or rehabilitation;</p> <p>(b) providing policies, rules and other methods directed at restoration or rehabilitation in regional policy statements, and plans;</p> <p>(c) where practicable, imposing or reviewing restoration or rehabilitation conditions on resource consents and designations, including for the continuation of activities; and recognising that where degraded areas of the coastal environment require restoration or rehabilitation, possible approaches include:</p> <p>(i) restoring indigenous habitats and ecosystems, using local genetic stock where practicable; or</p> <p>(ii) encouraging natural regeneration of indigenous species, recognising the need for effective weed and animal pest management; or</p> <p>(iii) creating or enhancing habitat for indigenous species; or</p> <p>(iv) rehabilitating dunes and other natural coastal features or processes, including saline wetlands and intertidal saltmarsh; or</p> <p>(v) restoring and protecting riparian and intertidal margins; or</p> <p>(vi) reducing or eliminating discharges of contaminants; or</p> <p>(vii) removing redundant structures and materials that have been assessed to have minimal heritage or amenity values and when the removal is authorised by required permits, including an archaeological authority under the Historic Places Act 1993; or</p> <p>(viii) restoring cultural landscape features; or</p> <p>(ix) redesign of structures that interfere with ecosystem processes; or</p> <p>(x) decommissioning or restoring historic landfill and other contaminated sites which are, or have the potential to, leach material into the coastal marine area</p>	<ul style="list-style-type: none"> a range of natural character from pristine to modified; and experiential attributes, including the sounds and smell of the sea; and their context or setting. <p>It is noted that a number of these matters are not relevant to the discharge. Such as natural landforms, darkness of the night sky, places and areas that are wild and scenic.</p> <p>Ecological effects are discussed in Table I.5</p> <p>With regard to water, natural elements, and experiential attributes, section 10 of this AEE states that monitoring has not found any evidence of nutrient enrichment of the sediments or water column of eastern Waimea Inlet or adjacent areas of Tasman Bay because of the discharge.</p> <p>Benthic monitoring downstream of the discharge shows normally functioning coastal seabed habitats and no evidence of abnormal sediment anoxia or other obvious signs of organic enrichment.</p> <p>Monitoring also indicates that the discharge (under normal conditions) is unlikely to have a significant adverse effect on the suitability of areas outside the mixing zone for contact recreation. As such it is not proposed as part of this consent application to reduce the discharge of treated wastewater to the Waimea Inlet.</p> <p>It terms of the practicability of reducing or eliminating the discharge, alternative discharges have been canvassed in section 7 the AEE. This included looking at potential areas to discharge to land and investigating beneficial reuse opportunities. It is considered that the discharge of treated wastewater to the Waimea Inlet is the Best Practicable Option. Section 128 of the RMA also provides circumstances where a consent authority may review consent conditions.</p> <p>It is considered that the project is consistent with this policy.</p>
NZCPS Policy 15	<p>Natural features and landscapes</p> <p>To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use and development:</p> <p>(a) avoid adverse effects of activities on outstanding natural features and ...</p> <p>(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects on other natural features and natural landscapes in the coastal environment:</p> <p>...</p>	<p>It is noted that this policy, mainly sets out the criteria for Councils to schedule outstanding natural features and landscapes.</p> <p>Based on sections 10 and 11 of this AEE, It is considered that the discharge and the existing pipe and diffuser outlet structure does not adversely affect any outstanding natural features and landscapes and does not have significant adverse effects on other natural features and natural landscapes.</p>
TRPS Objective 1	Maintenance and enhancement of the quality of the Tasman District environment	As discussed above, it is considered that the project maintains and enhances the environment of the Tasman District by eliminating the need for individual onsite treatment where reticulation is available. Therefore reducing potential adverse effects from each of these schemes, as the WWTP provides a safe and efficient means to treating wastewater for both Nelson City and the Tasman District.
TRPS Objective 9.5	Preservation of the natural character of the coastal environment, including the functioning of natural processes.	As discussed above in Objective 2 and Policy 14 of the NZCPS, it is considered that the project is consistent with this policy.
TRPS Policy 9.6	<p>The Council will preserve the natural character of the coastal environment by protecting:</p> <p>(a) natural features and landscapes, such as headlands and cliffs, coastal plains, estuaries, tidal flats, dunes and sand beaches;</p> <p>(b) habitats such as estuaries and wetlands;</p> <p>(c) ecosystems, especially those including rare or endangered species or communities, or migratory species;</p> <p>(d) natural processes, such as spit formation; (</p> <p>(e) water and air quality;</p> <p>(f) having regard to the:</p> <p>(i) rarity or representativeness;</p> <p>(ii) vulnerability or resilience;</p> <p>(iii) coherence and intactness;</p> <p>(iv) interdependence; and</p> <p>(v) scientific, cultural, historic or amenity values;</p> <p>of such features, landscapes, habitats, ecosystems, processes and values.</p>	<p>As discussed above in Objective 2 and Policy 14 of the NZCPS, it is considered that the project is consistent with this policy.</p> <p>It is noted also that this is a plan drafting policy. Setting out features and criteria for Council to protect.</p>

Reference	Provision	Comment
NRPS Objective CO1.2.1	Achievement of the social, economic and cultural needs of the community within the coastal environment, while ensuring a high level of protection is afforded to the natural character and to natural and physical resources associated with the coast.	<p>The provision of and ongoing operation of the WWTP will enable people and communities to achieve their social, economic, and cultural needs.</p> <p>Natural character is discussed in detail in Objective 2 and Policy 14 of the NZCPS above, it is considered that the project is consistent with this objective.</p> <p>It is considered that the project is consistent with this objective.</p>
NRPS Policy CO1.3.3	To identify and protect areas of significant conservation value within the coastal environment based on the following criteria ...	It is noted that this policy directs Council to identify and protect significant conservation values within the coastal environment. There this policy is not considered directly relevant to this project,
NRPS Policy CO1.3.4	To protect the integrity, functioning and resilience of the coastal environment in terms of: <ul style="list-style-type: none"> (i) the dynamic processes and features arising from the natural movement of sediments, water and air; (ii) natural movement of biota; (iii) natural substrate composition; (iv) natural water and air quality; (v) natural bio-diversity, productivity, and biotic patterns, and (vi) intrinsic values of ecosystems. 	<p>The Waimea Inlet is listed in Schedule 25D of the TRMP as an area with nationally significant ecosystem values. These values include the inlet's status as the largest barrier-enclosed estuary in the South Island One of only two sites where the endangered peppergrass plant has been recorded. Also present are endangered grey saltbush, white heron, royal spoonbill, Australasian bittern and banded rail. Considered of outstanding importance to waders. Rabbit Island/Moturoa is the largest barrier island in New Zealand.</p> <p>As stated above, and covered in detail in section 10 of this AEE, in all surveys, biological communities living on (the epifauna and epiflora) and in (infauna) the sediments at all survey sites were in a relatively healthy and functional condition relative to those of similar habitats elsewhere in the Nelson-Marlborough Region. Changes observed among surveys were not indicative of over-enrichment and are considered to be related to natural variability over time.</p> <p>It is considered that this project is consistent with this policy.</p>
TRMP Objective 8.2.2	Maintenance and enhancement of the natural character of the margins of lakes, rivers, wetland and the coast, and the protection of that character from adverse effects of the subdivision, use, development or maintenance of land or other resources, including effects on landform, vegetation, habitats, ecosystems and natural processes.	As discussed above in Objective 2 and Policy 14 of the NZCPS, it is considered that the project is consistent with this policy.
TRMP Policy 8.2.3.3	To avoid, remedy or mitigate adverse effects of land management practices on the margins of water bodies, including wetlands	<p>Land management practices are generally considered to involve cultivation methods, planting and farming. With regards to this application it is considered that adverse effects from discharge of treated wastewater via irrigation to Bell Island can be appropriately mitigated through a set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly.</p> <p>It is considered that the project is consistent with this policy.</p>
TRMP Policy 8.2.3.6	To adopt a cautious approach in decisions affecting the margins of lakes, rivers and wetlands, and the coastal environment, when there is uncertainty about the likely effects of an activity.	<p>Detailed modelling and assessments have been undertaken in the preparation of this application. This includes reviewing monitoring data from previous and existing consents. A full set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly.</p> <p>It is considered that the project is consistent with this policy.</p>
TRMP Policy 8.2.3.21	To protect historic and cultural sites in riparian margins and the coastal environment	No land disturbance, or upgrades are proposed as part of this application. Therefore it is considered that there will be no impact on the protection of historic or cultural sites.
TRMP Objective 21.1.2	Preservation of the natural character of the coastal marine area, particularly its margins, and including the maintenance of all values that contribute to natural character, and its protection from the adverse effects of use or development.	As discussed above at Objective 2 and Policy 14 of the NZCPS, it is considered that the project is consistent with this policy.
TRMP Policy 21.1.3.1	To avoid, remedy or mitigate adverse effects on the natural character of the coastal marine area from activities, including: <ul style="list-style-type: none"> (a) physical modification to foreshore or seabed, including reclamation, dredging, removal or deposition of material, or other disturbance; (b) disturbance of plants, animals, or their habitats; (c) structures, including impediments to natural coastal processes; (d) the use of vessels or vehicles; (e) stock grazing or trampling on coastal margins; (f) the discharge of any contaminant or waste. 	<p>As discussed above at Objective 2 and Policy 14 of the NZCPS, and in relation to matter (f) it is considered that adverse effects on the natural character of the coastal marine area from the discharge of treated wastewater can be mitigated through consent conditions. A full set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly.</p> <p>It is considered that the project is consistent with this policy.</p>
TRMP Objective 21.3.2	Maintenance of the natural character and landscape of the coastal marine area	As discussed above at Objective 2 and Policy 14 of the NZCPS, it is considered that the project is consistent with this policy.

Reference	Provision	Comment
TRMP Policy 21.3.3.1	To allow structures or physical modification in the coastal marine area only where the effect on the natural components of landscape and seascape values of the area, including any contribution to any likely cumulative effect, is limited in extent and is consistent with the existing degree of landscape and seascape modification	As part of this project, consent is being sought for a controlled activity for the existing pipe and diffuser structure. It is considered that the effect of this structure is limited in extent and is consistent with the existing degree of landscape and seascape modification. It is considered that the project is consistent with this policy.
TRMP Objective 23.1.2	Subdivision, use or development of coastal land that avoids the need for protection works against hazards from natural coastal processes	It is considered the location and elevation of the WWTP avoids the need for protection works against hazards from natural coastal processes. The NCC and TDC design standards take into consideration the effects of climate change in the designs for rising mains, pump stations and other wastewater infrastructure (the Ministry for the Environment recommends that authorities consider the consequences of a sea level rise of 0.8m for infrastructure assessment for the timeframe up to 2099 and to add 10mm per annum beyond that). The NRSBU Asset Management Plan (AMP) states that the discharge channel at the WWTP is 0.95 m above the highest recorded datum and that most of the other wastewater assets are located 2.4 m above that mark. The AMP states that the NRSBU will consider constructing seawalls or bunds around that ATAD area at the WWTP once a sea level rise of 500 mm is confirmed It is considered that the project is consistent with this objective.
TRMP Policy 23.1.3.1	To assess the likely need for coastal protection works when determining appropriate subdivision, use or development in the coastal environment and, where practicable, avoid those for which protection works are likely to be required.	As discussed at Objective 23.1.2 above, it is considered that the project is consistent with this objective.
NRMP Objective CM2	The preservation of the natural character of the coastal environment, particularly at the land/sea interface, and including the maintenance of all values that contribute to natural character, and its protection from the adverse effects of use or development.	The preservation of natural character is discussed above at Objective 2 and Policy 14 of the NZCPS, with regard to the interface at the land/sea, it is not anticipated that the project will have any adverse effects on natural character at this interface.
NRMP Objective CM5	A Coastal Marine Area where natural coastal processes are not adversely affected by activities on the foreshore or seabed	As part of this project, consent is being sought for a controlled activity for the existing pipe and diffuser outlet structure. It is considered that the adverse effects of the structure, and its occupation can be satisfactorily mitigated through volunteered consent conditions. A full set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly.
NRMP Objective DO5.1	An environment within which natural values are preserved and enhanced and comprise an integral part of the natural setting	As discussed above in Objective 2 and Policy 14 of the NZCPS, it is considered that the project is consistent with this policy in terms of natural element which are included in the definition of natural character.
NRMP Objective DO7.1	Preservation of the natural character of the coastal environment from inappropriate subdivision, use and development	As discussed above in Objective 2 and Policy 14 of the NZCPS, it is considered that the project is consistent with this policy.
NRMP Policy DO7.1.1	Activities on land (adjacent to the coast) should not have adverse effects on the life-supporting capacity of the coastal environment, either inside or outside the coastal marine area on: <ul style="list-style-type: none"> a) the quality and quantity of habitats; and b) the integral and essential ecological processes, and c) the viability of species populations, and d) the yield of quality of harvested populations, and e) water quality, and <p>natural processes such as sediment transport.</p>	The WWTP is a permitted activity under the TRMP and is not expected to have adverse effects on the life-supporting capacity of the coastal environment, either inside or outside the coastal marine area. It is considered that the project is consistent with this Policy.
NRMP Policy DO7.1.2.	Adverse effects of subdivision, use or development in the coastal environment should as far as practicable, be avoided. Where complete avoidance is not practicable, the adverse effects should be mitigated and provision made for remedying those effects to the extent practicable	As discussed above, it is considered that the discharge of treated wastewater to the Waimea Inlet is the best practicable option. Further, it is considered that the adverse effects of the discharge can be appropriately mitigated through the suite of volunteered consent conditions. A full set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly.
NRMP Policy DO7.1.3	Opportunities to restore or enhance the life-supporting capacity of the coastal environment should be identified, and where possible acted upon	This policy is addressed above at Policy CM1.6 in Table I-3.

Reference	Provision	Comment
NRMP DO7.1.4	Policy Subdivision, use, or development of land in the coastal environment should be located, designed and managed in a way that protects areas of significant indigenous vegetation, significant habitats of indigenous fauna, outstanding natural features and landscapes	<p>No land disturbance, or upgrades are proposed as part of this application. Therefore it is considered that there will be no removal of vegetation or impact outstanding natural features and landscapes.</p> <p>It is noted the pipe and diffuser outlet structure already exists, and no modifications are proposed.</p> <p>It is considered that the project is consistent with this policy.</p>

Table I-4: Treaty and Waitangi and Cultural Effects

Reference	Provision	Comment
NZCPS Objective 3	<p>To take account of the principles of the Treaty of Waitangi, recognise the role of tāngata whenua as kaitiaki and provide for tāngata whenua involvement in management of the coastal environment by:</p> <ul style="list-style-type: none"> recognising the ongoing and enduring relationship of tāngata whenua over their lands, rohe and resources; promoting meaningful relationships and interactions between tāngata whenua and persons exercising functions and powers under the Act; incorporating mātauranga Māori into sustainable management practices; and recognising and protecting characteristics of the coastal environment that are of special value to tāngata whenua. 	<p>In recognising the ongoing and enduring relationship of tāngata whenua over their lands, rohe and resources and iwi authorities have been consulted throughout the preparation of this resource consent application.</p> <p>Ngati Kuia, Ngati Apa ki te Rā Tō and Rangitane o Wairau have prepared a joint CEA, summarised in Section 15 of this AEE. This assessment identified the characteristics and cultures values of the coastal environment which are important to tāngata whenua</p> <p>The CEA states: <i>“The idea of human waste being intentionally discharged to a food gathering area is against tikanga as there is the perception that doing so would result in both illness and the consumption of human elements. The treatment of the waste at the facility removes the solid content both human solids, silt and plastics before going to the settling ponds for further aeration.</i></p> <p><i>The wind treatment also assists in breaking down the microbe content of the water making the risk to shellfish health minimal. These effect mitigations however, do not make the discharge consistent with tikanga and either the discharge should be to land or, should be further out to sea where it is away from common food gathering areas.”</i></p> <p>Section 15.3 of this AEE sets out the recommendations of the CEA and provides a response and actions to be undertaken by the NRSBU.</p> <p>It is considered that the project is not inconsistent with this objective</p>
NSCPS Policy 2	<p>The Treaty of Waitangi, tāngata whenua and Māori heritage In taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi), and kaitiakitanga, in relation to the coastal environment:</p> <p>...</p> <p>(d) provide opportunities in appropriate circumstances for Māori involvement in decision making, for example when a consent application or notice of requirement is dealing with cultural localities or issues of cultural significance, and Māori experts, including pūkenga², may have knowledge not otherwise available;</p> <p>...</p>	<p>As discussed above Ngati Kuia, Ngati Apa ki te Rā Tō and Rangitane o Wairau have prepared a joint CEA, summarised in Section 15 of this AEE. This assessment identified the characteristics and cultures values of the coastal environment which are important to tāngata whenua.</p> <p>It is considered that the project is consistent with this policy.</p>
NZCPS Policy 4	<p>Integration Provide for the integrated management of natural and physical resources in the coastal environment, and activities that affect the coast environment. This requires:</p> <p>(a) co-ordinated management or control of activities within the coastal environment, and which could cross administrative boundaries, particularly:</p> <p>...</p>	<p>The WWTP services both Nelson City and the Tasman District and this application has assessed against the planning frameworks of the Nelson and Tasman. Effects across administrative boundaries have been assessed. Cultural values have been assessed through the preparation of a CEA.</p> <p>It is considered that the project is consistent this policy.</p>
NZCPS Policy 5	<p>Land or waters managed or held under other Acts (1) Consider effects on land or waters in the coastal environment held or managed under:</p> <p>(a) the Conservation Act 1987 and any Act listed in the 1st Schedule to that Act; or</p> <p>(b) other Acts for conservation or protection purposes; and, having regard to the purposes for which the land or waters are held or managed:</p> <p>(c) avoid adverse effects of activities that are significant in relation to those purposes; and</p> <p>(d) otherwise avoid, remedy or mitigate adverse effects of activities in relation to those purposes.</p> <p>Have regard to publicly notified proposals for statutory protection of land or waters in the coastal environment and the adverse effects of activities on the purposes of that proposed statutory protection.</p>	<p>With regard to the Tasman and Nelson regions, section 62 of the Marine and Coastal Area Act requires that parties applying for coastal permits in an area where an application for a CMT or PCR has been made, notify and seek the views of the applicant group and that the views of the CMT applicant need to be included in the material supplied to support any application.</p> <p>It is noted that there are two relevant applications which include Bell Island. These applications have been made by:</p> <ul style="list-style-type: none"> Ngati Tamaki Te Tau Ihu; and Te Atiawa o Te Waka-a-Maui Trust. <p>Iwi been invited to hui on the WWTP resource consent applications and to prepare a CEA.</p>

Reference	Provision	Comment
TRPS Policy 4.1	The Council will pursue a process of consultation and participation in resource management between itself and the tāngata whenua of the District.	<p>It is considered that the project is consistent with this objective.</p> <p>Whilst this policy is directed at Council, it is important to note that the NRSBU has consulted iwi authorities (on behalf of tāngata whenua) throughout the preparation of this resource consent application. Hui for iwi authorities were held and are described in section 18 of this AEE.</p> <p>Ngati Kuia, Ngati Apa ki te Rā Tō and Rangitane o Wairau have prepared a joint CEA, this is summarised in Section 15 of this AEE.</p> <p>It is considered that the project is consistent with this policy.</p>
NRPS Policy TW1.5.5	To ensure that tāngata whenua views are sought and considered prior to Council consideration of any resource consent application which relates to matters which the tāngata whenua themselves have indicated are of significance to them.	<p>As discussed above, Ngati Kuia, Ngati Apa ki te Rā Tō and Rangitane o Wairau have prepared a joint CEA, this is summarised in Section 15 of this AEE. The CEA sets out tāngata whenua views and provides an assessment of effects from the discharge of treated wastewater on cultural values.</p> <p>It is considered that the project is consistent with this policy.</p>
NRPS Policy TW1.5.11	To recognise the tāngata whenua are kaitiaki of the coastal environment. (Reference: Principle 9 of the New Zealand Coastal Policy Statement)	<p>In CEA prepared by Ngati Kuia, Ngati Apa ki te Rā Tō and Rangitane o Wairau, it is noted that <i>"Kaitiaki often receive their mana or authority with respect to a particular locality, place or resource because they possess an intricate knowledge of the local environment."</i></p> <p>Tāngata whenua as kaitiaki of the coastal environment have been recognised through the assessment of cultural values.</p> <p>It is considered the project is consistent with this policy.</p>
NRPS Policy CO1.3.9	When managing the coastal environment, to recognise and provide for matters of special significance to tangata whenua identified and protected in accordance with tikanga maori	<p>As discussed above, a CEA has been prepared to recognise, and provide for matters of significance tangata whenua</p> <p>The CEA notes that <i>"The archaeological report prepared for the 2008 pipeline upgrade provides useful information regarding the significance of the island to early Maori for food gathering and stone working. This is illustrated by the high number of recorded sites along the shoreline of Bells Island and the other islands in the estuary."</i></p> <p>It is noted that no further works are proposed to the existing pipeline as part of this application. It is considered that the project is consistent with this policy.</p>
NRPS Policy WA1.3.7	To recognise and provide for the cultural and spiritual values of water to tāngata whenua	<p>As discussed above, Ngati Kuia, Ngati Apa ki te Rā Tō and Rangitane o Wairau have prepared a joint CEA, this is summarised in Section 15 of this AEE. The CEA sets out tāngata whenua views and provides an assessment of effects from the discharge of treated wastewater on cultural values.</p> <p>It is considered that the project is consistent with this policy.</p>
TRMP Objective 21.5.2	Maintenance of the cultural heritage values of items, sites or areas in the coastal marine area, including taonga of the tāngata whenua.	<p>The CEA notes that <i>"Ngati Apa ki te Ra To have interests in the inland Waimea valley and the headwaters of the Buller River the relationship with Ngati Apa and Ngati Waewae meant a trade in Pounamu from the central west coast also took place and some green stone has been found at sites in the Waimea Inlet"</i></p> <p>The CEA also notes that as this is a discharge to the CMA, <i>"it is not over any identified archaeological sites"</i></p> <p>It is considered that the project is consistent with this policy.</p>
NRMP Objective DO1.1	Management of natural and physical resources that recognises the needs of Maori communities and enables them to provide for their social, economic and cultural well-being and their health and safety.	<p>The preparation of this application has been informed by an understanding of tāngata whenua values and the effects on them. It is considered that the needs of Maori communities have been recognised through the preparation of a CEA.</p>
NRMP Policy CM6.1	Coastal marine water quality standards should be maintained or enhanced to reflect community aspirations and tangata whenua values for: a) management for fisheries, fish spawning, aquatic systems, and aesthetic purposes over the whole Coastal Marine Area, and b) contact recreation, shell fish gathering, or cultural purposes, in specified parts of the Coastal Marine Area	<p>Coastal water quality is addressed in Table I-2 above. A quantitative microbiological risk assessment (QMRA) has been carried out to determine the potential risk of illness associated with the recreational uses of the receiving water. This is summarised at section 10.3 of this AEE. The QMRA concluded that the existing level of treatment is sufficient to reduce the public health risk levels to below the No Observable Adverse Effect Level (NOAEL) for primary contact recreation, secondary contact recreation and shellfish gathering.</p>

Reference	Provision	Comment
		<p>The CEA also notes that " <i>The wind treatment also assists in breaking down the microbe content of the water making the risk to shellfish health minimal. These effect mitigations however, do not make the discharge consistent with tikanga and either the discharge should be to land or, should be further out to sea where it is away from common food gathering areas.</i>"</p> <p>It is considered that water quality standards will be maintained and therefore the project is generally consistent with this policy.</p>
NRMP Policy D01.1.1	Natural and physical resources should be managed in a way that recognises and provides for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.	This policy has been achieved through Ngati Kuia, Ngati Apa ki te Rā Tō and Rangitane o Wairau have preparing a joint CEA. The CEA sets out tāngata whenua views and provides an assessment of effects from the discharge of treated wastewater on cultural values.
NRMP Policy D01.1.2	Management of natural and physical resources that takes into account the principles of the Treaty of Waitangi and has particular regard to kaitiakitanga.	<p>The CEA prepared by sets out the meaning of kaitiakitanga, being the " <i>broad notion which includes guardianship, sustainability, wise management, and resource indicators, where resources themselves indicate the state of their own mauri. Kaitiakitanga is a term that denotes the package of tikanga or practices concerning environmental management. A kaitiaki is a person and/or agent who perform the tasks of guardianship.</i>"</p> <p>It is considered that the project is consistent with this policy.</p>
NAQP Policy A5-1-1	The air resource should be managed in a way that recognises and provides for the relationship of tāngata whenua and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga	<p>Ngati Kuia, Ngati Apa ki te Rā Tō and Rangitane o Wairau have prepared a joint CEA, this is summarised in Section 15 of this AEE. The CEA sets out tāngata whenua views and provides an assessment of effects from the discharge of treated wastewater on cultural values.</p> <p>The following comments have been made in relation to air quality: "Culturally Māori put significant value on the mauri of air and although the application is for the discharge of odour as well, air is not contained in the Act."</p> <p>It is considered that the project is consistent with this policy.</p>
NAQP Policy A5-1-2	Management of the air resource that takes into account the principles of Te Tiriti O Waitangi ¹ (Treaty of Waitangi) and has particular regard to kaitiakitanga.	<p>The CEA prepared by Ngati Kuia, Ngati Apa ki te Rā Tō and Rangitane o Wairau sets out the meaning of kaitiakitanga, being the " <i>broad notion which includes guardianship, sustainability, wise management, and resource indicators, where resources themselves indicate the state of their own mauri. Kaitiakitanga is a term that denotes the package of tikanga or practices concerning environmental management. A kaitiaki is a person and/or agent who perform the tasks of guardianship..</i>"</p> <p>It is considered that the project is consistent with this policy.</p>

Table I-5: Ecological Effects

Reference	Provision	Comment
NZCPS Objective 1	<p>To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land, by:</p> <ul style="list-style-type: none"> maintaining or enhancing natural biological and physical processes in the coastal environment and recognising their dynamic, complex and interdependent nature; protecting representative or significant natural ecosystems and sites of biological importance and maintaining the diversity of New Zealand's indigenous coastal flora and fauna; and maintaining coastal water quality, and enhancing it where it has deteriorated from what would otherwise be its natural condition, with significant adverse effects on ecology and habitat, because of discharges associated with human activity 	<p>A detailed assessment has been undertaken in order to determine the effects on biological and physical processes including ecosystems. As noted in section 8 of this AEE, Waimea Inlet is listed in Schedule 25D of the Tasman Resource Management Plan (TRMP) as an area (Area 22) with nationally significant ecosystem values. These values include the Inlet's status as the largest barrier-enclosed estuary in the South Island.</p> <p>Section 10 of this AEE states that benthic monitoring downstream of the discharge shows normally functioning coastal seabed habitats and no evidence of abnormal sediment anoxia or other obvious signs of organic enrichment.</p> <p>Elevated concentrations of nickel and chromium in sediments and arsenic concentrations in cockle tissues from the survey sites are thought to be attributable to natural catchment inputs. Comparisons among potential impact and reference sites suggest that these elevated concentrations were not related to the wastewater discharge.</p> <p>Biological communities at all survey sites are in a relatively healthy and functional condition, similar to equivalent habitats elsewhere in the Nelson-Marlborough region.</p> <p>It is also noted that the Quantitative Microbial Risk Assessment (QMRA) concluded that the existing level of treatment is sufficient to reduce the public health risk levels to below the No</p>

Reference	Provision	Comment
		<p>Observable Adverse Effect Level (NOAEL) for primary contact recreation, secondary contact recreation and shellfish gathering;</p> <p>Maintenance of coastal waters is addressed in Table 19.2</p> <p>It is considered that the project is consistent with objective 1.</p>
NZCPS Policy 3	Precautionary approach Adopt a precautionary approach towards proposed activities whose effects on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse.	<p>Detailed modelling and assessments have been undertaken in the preparation of this application. This includes reviewing monitoring data from the previous consents. Regular monitoring is proposed as part of the suite of volunteered consent conditions.</p> <p>It is considered that the project is consistent with this policy.</p>
NZCPS Policy 11	Indigenous biological diversity (biodiversity) To protect indigenous biological diversity in the coastal environment: (a) avoid adverse effects of activities on ... (b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on: ...	<p>As set out in section 10 of this AEE, In all surveys, biological communities living on (the epifauna and epiflora) and in (infauna) the sediments at all survey sites were in a relatively healthy and functional condition relative to those of similar habitats elsewhere in the Nelson-Marlborough Region. Changes observed among surveys were not indicative of over-enrichment and are considered to be related to natural variability over time.</p> <p>The Cawthron report states that in view of the fact that nutrient concentrations do not appear to be increased outside the mixing zone, ecological effects from nutrient enrichment, such as stimulation of excessive algal growth, are not expected either. Cawthron state that this is supported by surveys of phytoplankton community composition in inner Tasman Bay, which do not indicate a proliferation of undesirable biological growth.</p> <p>It is considered that the project is consistent with this policy.</p>
NRPS Objective WA1.2.2	The maintenance and enhancement of coastal water quality to protect fishery, fish spawning and aquatic ecosystems and, in specific areas, to protect shellfish gathering, contact recreation, and cultural and spiritual values.	<p>Maintenance and enhancement of coastal waters is addressed in Table 19.2. Aquatic ecosystems including shellfish and contact recreation is addressed above in Objective 1.</p> <p>It is considered that the project is generally consistent with objective WA1.2.2</p>
TRPS Objective 2	Maintenance of the biological diversity and healthy functioning of land, freshwater, coastal and marine ecosystems	<p>This objective is addressed above in detail in section 10 of this AEE and at NZCPS Policy 11 above.</p> <p>It is considered that the project is consistent with this policy.</p>
TRPS Objective 6.2	Maintenance and enhancement of significant areas of indigenous vegetation, significant riparian lands, significant habitats of indigenous fauna, and significant natural, landscape, and historic features of lands.	<p>Waimea Inlet is listed in Schedule 25D of the TRMP as an area with nationally significant ecosystem values. These values include the inlet's status as the largest barrier-enclosed estuary in the South Island One of only two sites where the endangered peppergrass plant has been recorded. Also present are endangered grey saltbush, white heron, royal spoonbill, Australasian bittern and banded rail. Considered of outstanding importance to waders. Rabbit Island/Moturoa is the largest barrier island in New Zealand.</p> <p>As stated above, and covered in detail in section 10 of this AEE, in all surveys, biological communities living on (the epifauna and epiflora) and in (infauna) the sediments at all survey sites were in a relatively healthy and functional condition relative to those of similar habitats elsewhere in the Nelson-Marlborough Region. Changes observed among surveys were not indicative of over-enrichment and are considered to be related to natural variability over time.</p> <p>It is considered that this project is consistent with this objective.</p>
TRPS Policy 10.9	The Council will ensure that environmental contamination from the storage, treatment or disposal of wastes, particularly hazardous wastes, is avoided, remedied or mitigated	<p>It is not proposed to dispose of hazardous wastes as part of this application. The discharge of treated wastewater is addressed in Table I-2 above.</p> <p>It is considered that the project is consistent with this policy.</p>
NRMP Objective CM1	To maintain or enhance the life-supporting capacity of coastal ecosystems.	As discussed above in objective 1, it is considered that the project is consistent with this objective.
NRMP Objective CM3	The protection of areas of significant indigenous vegetation, significant habitats of indigenous fauna and outstanding natural features within the Coastal Marine Area; and restoration and rehabilitation of degraded vegetation and habitats	<p>Waimea Inlet is listed in Schedule 25D of the Tasman Resource Management Plan as an area with nationally significant ecosystem values. These values include the inlet's status as the largest barrier-enclosed estuary in the South Island One of only two sites where the endangered peppergrass plant has been recorded. Also present are endangered grey saltbush, white heron, royal spoonbill, Australasian bittern and banded rail. Considered of outstanding importance to waders. Rabbit Island/Moturoa is the largest barrier island in New Zealand.</p> <p>It is therefore considered that the Waimea Inlet has been protected through the TRMP.</p>

Reference	Provision	Comment
NRMP Policy CM3.3	Riparian vegetation along the coastline, particularly around the margins of estuaries, should be protected and enhanced	As discussed above, no land disturbance or modifications are proposed to the existing pipe and diffuser outlet structure and therefore no impact on riparian vegetation along the coastline is anticipated. It is noted also that this policy applies to the Nelson jurisdiction, and therefore is not of key relevance.
NRMP Policy CM3.5	Opportunities to restore and rehabilitate vegetation and habitat values within the Coastal Marine Area should be identified and actioned where appropriate	No opportunities have been identified through the preparation of this application to restore and rehabilitate vegetation and habitat values, this is not to say that opportunities could be identified in the future, through regular monitoring, or review, when new technology becomes available. It is considered that the project is consistent with this policy by including volunteered consent conditions on monitoring. A full set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly.
NRMP Policy CM5.3	The deposition of substances on the foreshore or seabed should not adversely affect the form, texture or natural processes of the foreshore. (In this respect, regard should be had for the desirability of a deposited substance being of the same size, sorting and parent material as the receiving sediments.)	Section 10 and Appendix C of this AEE state that 28 ha of the Inlet was degraded by nutrient enrichment, high macroalgal growth and accumulation of fine mud. These areas most affected were locations of high natural deposition, where conditions served to concentrate catchment inputs of sediments and nutrients and provide suitable conditions for the growth of opportunistic algae. None of these areas are in the downstream trajectory of the discharge from the Bell Island outfall. It is considered that the project is consistent with this policy.
NRMP Policy CM6.1	Coastal marine water quality standards should be maintained or enhanced to reflect community aspirations and tōngata whenua values for: a) management for fisheries, fish spawning, aquatic ecosystem, and aesthetic purposes over the whole Coastal Marine Area, and b) contact recreation, shell fish gathering, or cultural purposes, in specified parts of the Coastal Marine Area	Maintenance and enhancement of coastal waters is addressed in Table 19.2. Aquatic ecosystems including shellfish and contact recreation is addressed above in Objective 1. It is considered that the project is consistent with objective CM6.1
TRMP Objective 10.1.2	Protection and enhancement of indigenous biological diversity and integrity of terrestrial, freshwater and coastal ecosystems, communities and species.	Waimea Inlet is listed in Schedule 25D of the TRMP as an area with nationally significant ecosystem values. These values include the inlet's status as the largest barrier-enclosed estuary in the South Island One of only two sites where the endangered peppergrass plant has been recorded. Also present are endangered grey saltbush, white heron, royal spoonbill, Australasian bittern and banded rail. Considered of outstanding importance to waders. Rabbit Island/Moturoa is the largest barrier island in New Zealand. It is considered that the Waimea Inlet has been protected through the TRMP and therefore the project is consistent with this objective.
TRMP Policy 10.1.3.2	To safeguard the life-supporting capacity of the District's indigenous ecosystems, including significant natural areas, from the adverse effects of subdivision, use and development of land.	It is noted that this policy applies to land. The WWTP is a permitted activity in the TRMP, however no significant upgrades are proposed as part of this application. Further no modifications are proposed to the existing pipe and diffuser outlet structure. It is considered that the project is consistent with this Policy.

Table I-6: Effects of Discharge to Land

Reference	Provision	Comment
TRPS Objective 6.1	Avoidance of the loss of the potential for land of productive value	It is considered that the project will not lead to the irreversible loss of productive values that can arise through continued land fragmentation or conversion to non-productive land uses. It is noted also that the WWTP is an existing land use. It is considered that the project is consistent with this objective.
TRPS Objective 7.4	Maintenance and enhancement of the quality of surface waters and groundwaters for all public uses and values.	In terms of the discharge of treated wastewater to land on Bell Island via irrigation. Section 12 notes that Nitrate nitrogen concentrations within the control bore have been consistently elevated, with the irrigation bore also showing significantly elevated nitrate nitrogen results since 2016 (although it is noted that the concentration within the irrigation bore remains consistently below that which is reported in the control bore).

Reference	Provision	Comment
		<p>None of the groundwater bores on Bell Island are used by the public. NRSBU is proposing some amendments to the groundwater programme to better characterise the impact on groundwater quality from the discharge.</p> <p>With regard to the seepage to groundwater from clay-lined treatment facilities potential adverse effects of nitrogen seeping in treated wastewater from the seepage sources on groundwater resources are expected to be less than minor.</p> <p>Groundwater beneath the site is expected to flow towards the Waimea Inlet, located approximately 60 metres from the nearest pond. The aquifer through-flow has not been calculated, however based on the permeability of the sediments this is likely to be high. Despite this the ponds are located within close proximity to the inlet and therefore the amount of dilution occurring within the aquifer may be low. Regardless of permeability there will be little if any attenuation, other than dilution, of total nitrogen through the sediments.</p> <p>As discussed, it is unlikely that the groundwater will be used for public uses, due to the close location to the Waimea Inlet and use of the bores by the WWTP for monitoring over potable water supply.</p> <p>It is considered that this project is consistent with this objective.</p>
TRPS Policy 10.4	Council will avoid, remedy, or mitigate adverse effects of the disposal of solid or liquid waste contaminants, by seeking land disposal of such wastes where it is the best practicable option	The discharge of treated wastewater to the Waimea Inlet is considered the best practicable option. It is considered that adverse effects will be appropriately mitigated through consent conditions. A full set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly.
TRMP Objective 33.1.2.1	The discharge of contaminants in such a way that avoids, remedies or mitigates adverse effects while: (a) maintaining existing water quality; and (b) enhancing water quality where existing quality is degraded for natural and human uses or values.	As discussed above in objective 7.4, it is considered that the project is consistent with this objective.
TRMP Objective 33.1.2.2	The management of land and water use in the Waimea Water Management Zones to maintain, and where it is degraded to improve, water quality to meet the management objectives specified in Schedule 30B.	<p>Bell Island is located within the Waimea Water Management Zones. In terms of Schedule 30B(13) for Coastal Waters, the following objectives apply:</p> <p>Water quality that meets the needs of:</p> <ul style="list-style-type: none"> • aquatic organisms, • recreational water users • consumption of shellfish • amenity and landscape values. <p>These factors have been addressed in detail in Table 19.2, 19.3 and 19.5.</p> <p>It is considered that the project is consistent with this Objective.</p>
TRMP Policy 33.1.3.6	To take into account the following factors in determining the significance of actual or likely adverse effects on the receiving water of or from contaminant discharges: (a) Any water classification given in any schedule to Chapter 36 or water conservation order. (b) Existing water quality of the receiving water. (c) The significance or sensitivity of the aquatic life or ecosystem. (d) The extent of the water body adversely affected. (e) The magnitude, time of year, frequency and duration of the adverse effect, including any cumulative effects as a result of the discharge. (f) The range and intensity of uses and values of the water body. (g) The conflicts between uses and values of the water body. (h) The nature of the risks of the adverse effect. Any relevant national or international water quality guidelines or standards, or water conservation order.	<p>The following factors have been addressed in detail in section 12 and 13 of this AEE. In terms of the groundwater. It is noted that the groundwater source is located in close proximity to the Waimea Inlet, any seepage from the base of the ponds is likely to migrate to the inlet through the movement of groundwater.</p> <p>It is considered that these factors have been taken into account in determining adverse effects.</p>
TRMP Policy 33.1.3.13	To promote and encourage discharge of wastes to land or constructed wetlands in preference to discharge to water where: (a) discharge to land or constructed wetlands has less actual or potential adverse environmental effects than discharge to water; (b) land disposal system design and operation is such that adverse effects on the environment, including soil and surface and groundwater quality are avoided, remedied or mitigated; and the discharge to land is the best practicable option.	It is considered that the project is consistent with this policy and that adverse effects can be mitigated through consent conditions. A full set of volunteered consent conditions which are currently being prepared and will be provided to the consent authority shortly.

Reference	Provision	Comment
TRMP Policy 33.1.3.16	<p>(1) When considering any application for a discharge, the consent authority must have regard to the following matters:</p> <p>(a) the extent to which the discharge would avoid contamination that will have an adverse effect on the life-supporting capacity of fresh water including on any ecosystem associated with fresh water and</p> <p>(b) the extent to which it is feasible and dependable that any more than minor adverse effect on fresh water, and on any ecosystem associated with fresh water, resulting from the discharge would be avoided.</p> <p>(2) When considering any application for a discharge, the consent authority must have regards to the following matters:</p> <p>(a) the extent to which the discharge would avoid contamination that will have an adverse effect on the health of people and communities as affected by their secondary contact with fresh water; and</p> <p>(b) the extent to which it is feasible and dependable that any more than minor adverse effect on the health of people and communities as affected by their secondary contact with fresh water resulting from the discharge would be avoided.</p> <p>(3) This policy applies to the following discharges (including a diffuse discharge by any person or animal):</p> <p>(a) a new discharge; or</p> <p>(b) a change or increase in any discharge – of any contaminant into fresh water, or onto or into land in circumstances that may result in that contaminant (or, as a result of any natural process from the discharge of that contaminant, any other contaminant) entering fresh water.</p> <p>Paragraph 1 of this policy does not apply to any application for consent first lodged before the National Policy Statement for Freshwater Management 2011 took effect on 1 July 2011.</p> <p>Paragraph 2 of this policy does not apply to any application for consent first lodged before the National Policy Statement for Freshwater Management 2014 takes effect.</p>	<p>The following matters have been covered in detail in sections 12 and 13 of this AEE. It is considered that the project is consistent with this policy.</p>
TRMP Objective 33.2.3	The avoidance, remediation or mitigation of the adverse effects resulting from emergency discharges or accidental spills	<p>The O&M Manual covers the ongoing operation and maintenance of the WWTP. The O&M manual sets out requirements about health and safety, staffing, and response to abnormal events.</p> <p>It is considered that the project is consistent with this policy.</p>
TRMP Policy 33.2.3.1	To promote and advocate development of site contingency plans to avoid, remedy or mitigate the likely adverse effects of any emergency discharges or other accidental spills.	<p>As above for TRMP objective 33.2.3.</p> <p>It is considered that the project is consistent with this policy.</p>
TRMP Policy 33.2.3.2	To ensure that land use and discharge activities are carried out, having regard to contingency planning measures appropriate to the nature and scale of any discharge and risk to the environment for any accidental discharge of any contaminant that may result in connection with the activity.	<p>As above for TRMP objective 33.2.3.</p> <p>It is considered that the project is consistent with this policy.</p>

Table I-7: Air Quality Effects

Reference	Provision	Comment
NRPS Objective DA1.2.1	Improvement in Nelson's ambient air quality	<p>Section 14 of the AEE sets out mitigation measures which will effectively address potential odour emissions. Mitigation measures proposed, include an Odour Management Plan and Pond Management Plan.</p> <p>It is also noted the use of management plans have been successful in establishing definitive management steps for the best practice management of the ponds and the minimisation of pond-associated odour problems.</p> <p>It is considered that the project is consistent with this objective.</p>
NRPS Policy DA1.3.3	To control and/or reduce the volume or concentration of point source discharges so that the adverse effects on people or ecosystems at ground level are avoided or mitigated.	<p>As discussed above, section 14 of the AEE sets out mitigation measures which will effectively address potential odour emissions. Mitigation measures proposed, include an Odour Management Plan and Pond Management Plan.</p> <p>It is considered that the project is consistent with this policy.</p>
NRPS Policy DA1.3.4	To ensure industrial, commercial, rural and domestic discharges avoid significant adverse effect on the environment, including people, plants or animals	<p>Discharges from the WWTP are not expected to have significant adverse effect on the environment, including people, plants or animals.</p> <p>It is considered that the project is consistent with this policy.</p>
TRPS Policy 10.3	The Council will seek to avoid, remedy or mitigate adverse effects of the discharge of contaminants to air	<p>As discussed above, section 14 of the AEE sets out mitigation measures which will effectively address potential odour emissions. Mitigation measures proposed, include an Odour Management Plan and Pond Management Plan.</p>

Reference	Provision	Comment
		<p>It is also noted the use of management plans have been successful in establishing definitive management steps for the best practice management of the ponds and the minimisation of pond-associated odour problems.</p> <p>It is considered that the project is consistent with this objective.</p>
TRMP Objective 34.1.2	The discharge of contaminants to air in such a way that avoids, remedies or mitigates adverse effects while: (a) maintaining existing air quality; and (b) enhancing air quality where existing quality is degraded for natural or human uses or values.	<p>It is considered that the adverse effects of the discharge of contaminants to air can be mitigated through the measures set out in Section 14 of the AEE and proposed management plans as part of the volunteered suite of consent conditions (currently being prepared and will be provided to the consent authority shortly), maintaining existing air quality.</p> <p>It is considered that the project is consistent with this policy.</p>
TRMP Policy 34.1.3.1	To ensure that any discharges of contaminants to air are undertaken in a way that avoids, remedies or mitigates any adverse effects on the receiving environment or surrounding activities.	As discussed above at Objective DA1.2.1 above it is considered that the project is consistent with this policy
NAQP Objective A5-1	The maintenance, and the enhancement where it is degraded, of Nelson's ambient air quality, and the avoidance, mitigation or remediation of any adverse effects on the environment of localised discharges into air.	<p>It is noted that boundary of this plan applies to the Nelson region. Of relevance is the nearby Monaco Peninsula, a long-established closely settled residential area about 2 – 3km east-south-east of the WWTP. The suburbs of Stoke and Richmond have significant concentrations of suburban residential development close to the shores of the Waimea Inlet and are each relatively close to the WWTP.</p> <p>As noted in section 14 of this AEE, it is considered that adverse effects from odour can be mitigated through volunteered consent conditions (currently being prepared and will be provided to the consent authority shortly), which include the management plans for odour and the ponds.</p> <p>It is considered that the project is consistent with this policy.</p>
NAQP Policy A5-1-7	Discharges of contaminants to air should avoid, remedy or mitigate any adverse effects beyond the site of the discharge, having particular regard to: a) Impacts on ground level concentrations and ambient air quality, and on surrounding activities, and b) Adverse effects on human health, and c) Adverse effects on cultural and amenity values, and d) Adverse visual effects, and impacts on visibility, and e) Impacts on water quality, and on other natural resources including ecosystems, and f) The production of objectionable, noxious or offensive odour, dust, particles or other effects, and g) Adverse abrasive or corrosive effects, and h) The actual or potential cumulative effects of the discharge in combination with other discharges, and i) Any likely effect on the environment of not allowing the discharge, and The sensitivity of the receiving environment (including reverse sensitivity).	<p>As set out in section of this AEE, the predominant contaminant discharged to air is odour. It is considered that adverse effects from odour can be mitigated through consent conditions (a full set of volunteered consent conditions (which are currently being prepared and will be provided to the consent authority shortly), which include the management plans for odour and the ponds.</p> <p>It is considered that the project is consistent with this policy.</p>
NAQP Policy A5-1-8	Location Factors a) In considering the location, quantity and type of discharges of contaminants to air, regard should be had to meteorology (both localised and more widespread), topography and any sensitive receptors, ecosystems or activities, and b) Land use planning decisions, including planning techniques, should have regard to the actual or potential effects of discharges to air on ambient air quality, and seek to reduce localised effects on other activities and the potential for reverse sensitivity, and c) In considering urban form, settlement pattern, and subdivision design, regard should be had to potential impacts on ambient air quality, particularly from home heating and transport, and d) In considering existing discharges at locations not previously regulated but now regulated by this Plan, regard should be given to the social and economic implications of any required mitigation measures, in addition to the health benefits arising from improved air quality.	<p>Section 14 of the AEE has provided an assessment of each of these factors, this is summarised below:</p> <p>a) regards has been had to the meteorology, it is noted that the prevailing daytime winds in the Nelson area are from the north to north-west quarter, with sea breezes (generally on-shore, from the north) often prevalent in the afternoon and evenings. These predominant wind directions mean that the Bests Island, Monaco and Queen St, Richmond areas are likely to be the most impacted by odour plumes. b) the location of the WWTP on a low-lying island in the middle of the Waimea Inlet means that the community potentially exposed to odour events is quite widely scattered, either on nearby inhabited islands or on the adjacent peninsula. c) as above, the WWTP is located on a low-lying island. d) the discharge is current consented. New consent is being sought from Tasman District Council for the discharge to air, as this is the region the WWTP is located in. Consideration is being given to these objective and policies.</p> <p>It is considered that the project is consistent with this policy.</p>
NAQP A5-1-10	To work closely with adjoining local authorities to manage any actual or potential cross-boundary transmission of air contaminants that may adversely affect the other's territory.	The NRSBU, being a joint business unit of the Nelson City Council (NCC) and the Tasman District Council (TDC), operates the Bell Island Wastewater Treatment Plant (WWTP). It is considered that the joint business unit will provide a mechanism for the management of any actual or potential cross boundary transmission of air contaminants that may adversely affect the other's territory.