

In the Matter of the Environment Canterbury (Temporary Commissioners and Improved Water Management) Act 2010 and the Resource Management Act 1991

And

In the Matter of submissions and further submissions by the Christchurch City Council on the proposed Land and Water Regional Plan

**Rebuttal Evidence of Michael Patrick Bourke
for the Christchurch City Council**

1. My full name is Michael Patrick Bourke. The Christchurch City Council has lodged my principal evidence this proceeding. My evidence is on wastewater matters. I here reply to one key matter of concern which has been raised in evidence lodged for other submitters. This concerns the possible discharge of wet weather overflows of sewage to surface water, in proposed Rules 5.64 to 5.66.
2. Rule 5.64 and 5.65 in the proposed Land and Water Regional Plan (LWRP) provides that treated or untreated wastewater discharge to surface water is a non-complying activity.
3. The evidence of Sandra McIntyre on behalf of Ngai Tahu (C13C/13028) seeks in paragraph 5.14 of her evidence to prohibit any new discharges of sewage effluent to surface water (in Rule 5.64) and (in Rule 5.65 and 5.66) the removal of provision for overflow of any untreated sewage into water.
4. While I acknowledge and accept that the discharge of any form of human waste to surface water is culturally offensive to Ngai Tahu and adversely impacts the safeguarding of the mauri of fresh water, the prohibition of discharge to surface water of treated wastewater will not be practical or possible in the lifetime of this

plan. Similarly the overflow of untreated wastewater to rivers and drains in extreme wet weather events will also still occur through the life of this plan.

5. The prohibition of any new discharges of treated wastewater to surface water would preclude the consents to discharge from both the current Akaroa wastewater treatment plant, for which the Council has applied for the consent to be renewed for a short term, and from the proposed new Akaroa wastewater treatment plant. The proposed new wastewater treatment will produce a very high quality effluent suitable for reuse and irrigational, however there is no land currently available on which the treated wastewater can be used for irrigation, and further, during winter and wet weather, discharge to surface water (Akaroa Harbour) will be necessary. The soils and topography of the hills around Akaroa do not accommodate large rates of water application without severe erosion, and there is not sufficient flat land to store winter flows of wastewater (approximately 30,000 m³) even if there was sufficient irrigable land available for the remaining part of the year. Tankering this volume would require some seven tankers and trailer units working every day.

6. The removal of provision for wet weather overflow of sewage from the reticulation system into surface water cannot be practically achieved. As detailed in my original evidence, that overflow is a necessary part of the design of the system. The Christchurch City Council and Central Government are currently spending approximately \$800 million rebuilding the earthquake damage to the most severely effected third of the sewer network to maintain service. This work will substantially reduce the frequency and volume of wet weather sewer overflows. Even if three times this figure was spent, to replace the whole network, there would still be overflows due to surface flooding and the topography of the city. So in my opinion it is unrealistic to expect that a “no overflow” situation will be achieved in the life of this plan.

7. It is therefore my opinion that the activity status of Rules 5.64, 5.65 and 5.66 should remain as non-complying.

Date 13 February 2013

Mike Bourke.