

Friday 21 October 2022

OIA IRO-312

Email: [REDACTED] [@xtra.co.nz](mailto:[REDACTED]@xtra.co.nz)

Kia ora [REDACTED],

Official information request regarding correspondence on Wellington Water's decision to replace OIA IRO-295 as a Customer Inquiry.

I write regarding your official information request dated Thursday 29 September 2022 for correspondence on Wellington Water's decision to replace OIA IRO-295 as a customer inquiry.

We have considered your request in accordance with the Local Government Official Information and Meetings Act 1987 (the Act) and determined that we are able to grant your request in full.

Please see in our email response to you the email thread detailing Wellington Water's decisions to replace OIA IRO-295 as a customer inquiry.

Some information within the provided correspondence has been redacted in accordance with [Section 7\(2\)\(a\)](#) of the Act as it contains private information about private individuals.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Ngā mihi

[REDACTED]
Manager, Customer Experience
Wellington Water Ltd

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www.wellingtonwater.co.nz

Our water, our future.

From: [Official Information](#)
To: [REDACTED]; [Official Information](#); [REDACTED]
Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay (point of clarification)
Date: Wednesday, 28 September 2022 4:31:22 pm
Attachments: [image001.jpg](#)
[image002.png](#)

Coolio – will let him know.

Thanks for all your assistance on this stuff [REDACTED].

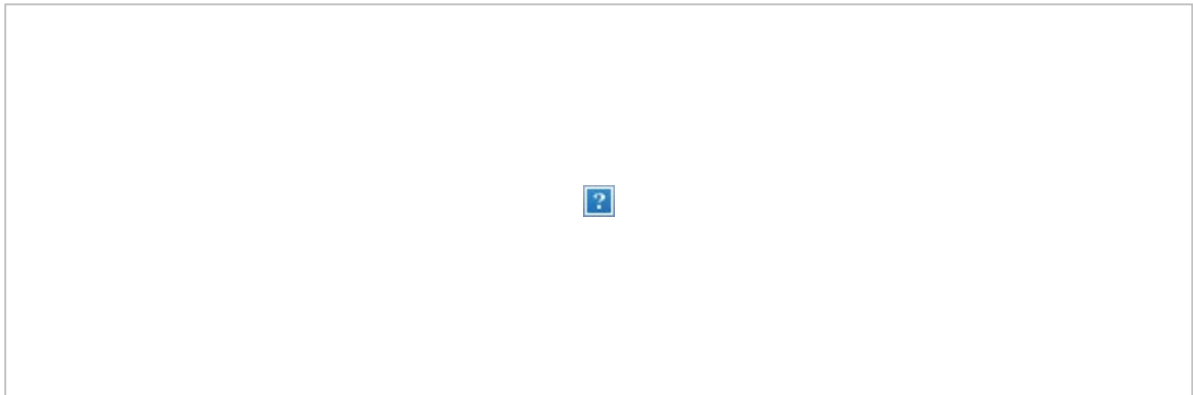
Ngā mihi nui

[REDACTED]

[REDACTED] (he/him)
Governance Coordinator - Chief Executive's Office



Mob [REDACTED]
Private Bag 39804, Wellington Mail Centre 5045
Level 4, 25 Victoria Street, Petone, Lower Hutt
www.wellingtonwater.co.nz



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From: [REDACTED]@wellingtonwater.co.nz>
Sent: Wednesday, 28 September 2022 4:29 pm
To: Official Information <official.information@wellingtonwater.co.nz>; [REDACTED]
[REDACTED]@wellingtonwater.co.nz>
Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay (point of clarification)

That's fine [REDACTED] I'm passing a draft response past by our legal advisors for the treatment plant consent to ensure accuracy.

[REDACTED]

From: Official Information <official.information@wellingtonwater.co.nz>

Sent: Wednesday, 28 September 2022 1:45 pm

To: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>; Official Information <official.information@wellingtonwater.co.nz>; [REDACTED] der [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay (point of clarification)

Kia ora [REDACTED] and [REDACTED]

[REDACTED] – thank you for taking this on

All good if I let [REDACTED] know that you'll be responding in due course [REDACTED]

Thanks

[REDACTED]

[REDACTED] (he/him)

Governance Coordinator - Chief Executive's Office



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From: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Sent: Wednesday, 28 September 2022 12:42 pm

To: Official Information <official.information@wellingtonwater.co.nz>; [REDACTED] [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay (point of clarification)

I'll contact him directly following a review from [REDACTED]

He has asked loaded questions, which require a bit of thinking before a response.

■

From: Official Information <official.information@wellingtonwater.co.nz>

Sent: Wednesday, 28 September 2022 12:06 pm

To: ■ [@wellingtonwater.co.nz](mailto:■@wellingtonwater.co.nz); Official Information <official.information@wellingtonwater.co.nz>; ■ [@wellingtonwater.co.nz](mailto:■@wellingtonwater.co.nz)

Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay (point of clarification)

Yeah sure!

If it is decided that this is an OIA, then it has missed the due date

Thanks

■

■ (he/him)

Governance Coordinator - Chief Executive's Office

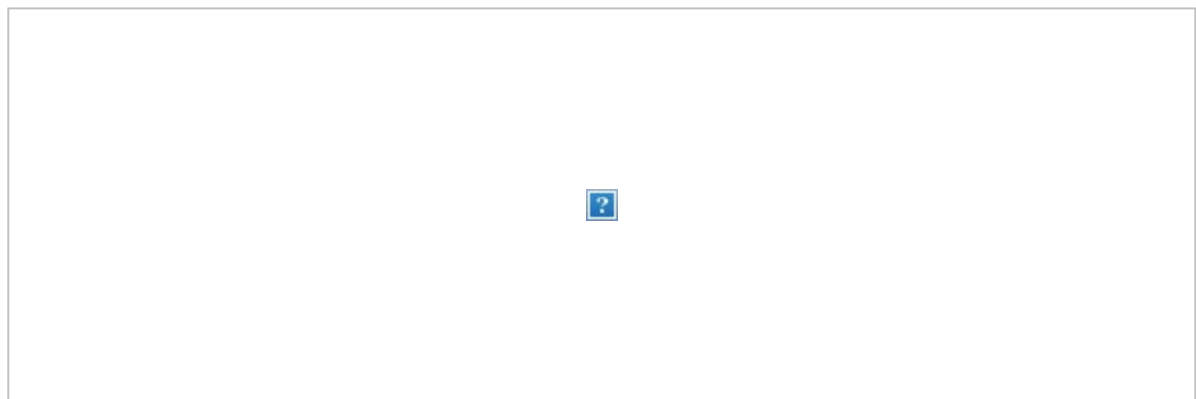


Mob ■

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From: ■ [@wellingtonwater.co.nz](mailto:■@wellingtonwater.co.nz)>

Sent: Wednesday, 28 September 2022 11:57 am

To: Official Information <official.information@wellingtonwater.co.nz>; ■ [@wellingtonwater.co.nz](mailto:■@wellingtonwater.co.nz)

Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay (point of clarification)

Let's wait until [REDACTED] has decided next steps. Ok?

Ngā mihi mahana

[REDACTED]

[REDACTED]

GM Network Strategy & Planning
Wellington Water

[REDACTED]

From: Official Information <official.information@wellingtonwater.co.nz>

Sent: Wednesday, 28 September 2022 11:15 am

To: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>; Official Information <official.information@wellingtonwater.co.nz>; [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay (point of clarification)

Kia ora [REDACTED]

That's correct.

Thanks

[REDACTED]

[REDACTED] (he/him)

Governance Coordinator - Chief Executive's Office



Mob [REDACTED]

Private Bag 39804, Wellington Mail Centre 5045
Level 4, 25 Victoria Street, Petone, Lower Hutt

www.wellingtonwater.co.nz



From: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Sent: Tuesday, 27 September 2022 5:17 pm

To: Official Information <official.information@wellingtonwater.co.nz>; [REDACTED]

[REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay (point of clarification)

Hi,

I see [REDACTED] is still having a think rather than agreeing to contact the requestor directly.

Can you please confirm?

Ngā mihi mahana

[REDACTED]

[REDACTED]

GM Network Strategy & Planning

Wellington Water

[REDACTED]

From: Official Information <official.information@wellingtonwater.co.nz>

Sent: Tuesday, 27 September 2022 3:40 pm

To: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Cc: Official Information <official.information@wellingtonwater.co.nz>

Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay (point of clarification)

Importance: High

Hi [REDACTED]

Thanks for your email I completely agree.

On our end, and if [REDACTED] is happy with this, I can close it off and note that you will contact [REDACTED] directly (but perhaps refer to this OIA tracking number still)

Let me know your thoughts

Ngā mihi nui

[REDACTED]

[REDACTED] (he/him)

Governance Coordinator - Chief Executive's Office



Mob [REDACTED]

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From: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Sent: Thursday, 22 September 2022 2:02 pm

To: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>; Official Information <official.information@wellingtonwater.co.nz>

Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay (point of clarification)

Yep. I haven't quite worked out how to approach it... My feeling is that because the request isn't asking for information that is held, it is not covered by LGOIMA and is more a customer query.

I'll have a bit more of a think

[REDACTED]

From: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Sent: Thursday, 22 September 2022 11:31 am

To: Official Information <official.information@wellingtonwater.co.nz>; [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay (point of clarification)

This one looks like it is with you [REDACTED], and would be a fairly short response. It is not really a request for information, more a request for interpretation.

[REDACTED]

From: Official Information <official.information@wellingtonwater.co.nz>

Sent: Wednesday, 21 September 2022 3:34 pm

To: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>; [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Cc: Official Information <official.information@wellingtonwater.co.nz>

Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay (point of clarification)

Hi [REDACTED] and [REDACTED]

Hope this email finds you well.

As per our discussion on this matter [REDACTED] I said I would reach out to you with a proposed response and I am sorry for not getting that through sooner.

Essentially what [REDACTED] is asking for here is clarification on his points. I note the sensitive nature of these sorts of requests, especially with respect to consents, and ask that a response be drafted by the pair of you for me to send off for GM approval

[REDACTED] I mentioned the automated system with you last week. Unfortunately I need to run a test through it with an OIA we've received about urban water pricing and will be confident in using the system for all matters after that trial.

Ngā mihi

[REDACTED] (he/him)
Governance Coordinator - Chief Executive's Office



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From: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Sent: Monday, 29 August 2022 8:54 am

To: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Cc: Official Information <official.information@wellingtonwater.co.nz>; [REDACTED]

[REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Subject: FW: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay

Hi [REDACTED]

Hope you had a good weekend.

How are you with responding to the below? With the time sensitive nature of the information being requested, is it reasonable to get back to [REDACTED] today or should this be acknowledged as an OIR?

Nga mihi

[REDACTED]

From: [REDACTED]@xtra.co.nz <[REDACTED]@xtra.co.nz>
Sent: Sunday, 28 August 2022 4:39 pm
To: [REDACTED]@wellingtonwater.co.nz
Cc: [REDACTED]@wellingtonwater.co.nz
Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay

Hello [REDACTED]

I appreciate WWL's response.

However, I need some clarification so I'm clear about the scope of the existing consents and also the scope of existing activities that are not consented.

I'm somewhat confused about your reference to WWL currently developing an application for a global wastewater discharge consent.

What exactly does that mean? In simple terms is that:

- an acknowledgement by WWL that it is currently operating without the necessary consents with respect to discharge of wastewater to the coastal marine area and/or to freshwater watercourses
- a process divorced from WWL's endeavours to renew its existing discharge to stormwater consent WGN180027
- and if so does that mean the WWL is actively working towards yet another standalone consent – this time a global wastewater consent.

My understanding is as follows:

- a. WWL/PCC has previously been issued discharge consents (air and water) for the operation of the WWTP.
- b. WWL is claiming this is a 'roll-over' consent on the basis that s.124 of the RMA applies.
- c. WWL agrees that this 'roll-over' consent does not (and will not if it is granted) encompass discharges of untreated wastewater directly to the CMA when the Rukutane Point pumpstation capacity is exceeded.
- d. WWL has an existing stormwater network consent WGN180027.
- e. This consent allows certain discharges of wastewater to the stormwater network.
- f. WWL does not have a coastal permit allowing it to discharge wastewater directly to the CMA when the capacity of the Rukutane Point pumpstation (135L/s) is exceeded.
- g. WWL agrees its existing network discharge consent (WGN180027) does not apply to the Rukutane Point pumpstation 'overflow' discharge.
- h. WWL agrees that all discharges from the Rukutane Pt pumpstation (which, by definition, do

not include discharges from the WWTP) are unlawful.

- i. WWL agrees there are other unlawful discharge points located within Porirua City.
- j. Those other unlawful discharge points are where the overflow wastewater discharges directly to the wider environment, and not to the stormwater network, and are therefore not encompassed by the 'global' consent WGN180027.

If any aspect of 'my understanding' above is incorrect please let me know, which and why.

If I am correct in my understanding, please confirm.

As you will be aware, the Wastewater Treatment Plant and Landfill Joint Committee meets on 30 August 2022. It is urgent that the Committee is provided with accurate information, and I therefore request the information I've sought by 5pm tomorrow (29/08/2022).

Thanks again for your assistance.

[REDACTED]

From: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Sent: Friday, 26 August 2022 4:23 pm

To: [REDACTED] <[\[REDACTED\]@xtra.co.nz](mailto:[REDACTED]@xtra.co.nz)>

Cc: [REDACTED] <[\[REDACTED\]@wellingtonwater.co.nz](mailto:[REDACTED]@wellingtonwater.co.nz)>

Subject: RE: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay

Kia ora [REDACTED]

I write in response to your formal complaint dated 8 August 2022.

Your complaint is in relation to the unauthorised discharges of untreated wastewater from the Rukutane Wastewater Pumping Station to the coastal marine area. I understand that your complaint specifically relates to the absence of a coastal permit for continuing discharges from this location.

We do not materially disagree with the statement of facts you have provided and agree that the current situation is not acceptable. This response will provide some further context and outline Wellington Water's approach to remedying the lack of coastal permit for this discharge.

Rukutane Point is one of many unauthorised discharge points located within Porirua City. In essence, the wastewater network (pipes and pump stations) has finite capacity and is prone to inflow and infiltration from rainfall. While the network is designed to carry some rainfall, in larger wet weather events its capacity can be exceeded. To respond to this (and avoid wastewater coming up toilets in houses, etc) deliberate overflow points were incorporated into the system. Historically these overflows were considered to be emergency discharges by those managing the wastewater networks and resource consent for direct and indirect discharges from the network had not been sought.

Wellington Water as managers of the wastewater network are clear that consent is required and that overflows must be reduced as much as practicable. In addition, the community has made it clear that wastewater network overflows are occurring much too frequently. To address these issues we are working on 'global' wastewater network overflow consents, across the various wastewater catchments. We have been working on the consent application for a number of years and have

engaged with Porirua City Council, Te Runanga o Toa Rangitira as well as harbour and community groups in its development. The global consent application for Porirua is expected to be lodged sometime in March 2023, and overflows from the Rukutane pump stations will be part of that application. The application proposes a framework for reducing the frequency and volume of wastewater network discharges over the life of the consent.

I hope that this explanation can provide you with some comfort that your concerns are shared and that Wellington Water and Porirua City Council are working to remedy the situation.

If you have further, specific questions about the Wastewater Network Overflow consenting programme, our Manager for RMA and Environment, [REDACTED] (CC'd in) would be happy to have a discussion at your convenience.

Ngā mihi

[REDACTED]

[REDACTED] – Customer Resolution Officer
Customer Experience Team



Ph 04 912 4470 Mob [REDACTED]

Private Bag 39804, Wellington Mail Centre 5045
Level 4, 25 Victoria Street, Petone, Lower Hutt

www.wellingtonwater.co.nz

If you have a complaint, please call 04 912 4470 or email customer@wellingtonwater.co.nz to access our free complaints process. If we cannot resolve your complaint, you can contact Utilities Disputes on 0800 22 33 40 or go to www.utilitiesdisputes.co.nz Utilities Disputes is a free and independent service for resolving complaints about utilities providers.

From: [REDACTED]
Sent: Tuesday, 16 August 2022 2:13 pm
To: [REDACTED]@xtra.co.nz
Subject: Discharge of Wastewater to the Marine Environment at Rukutane Point, Titahi Bay

Kia ora [REDACTED]

Thank you for your email dated 8 August 2022 regarding the discharge of wastewater at Rukutane Point, Titahi Bay – I have been asked to respond to your formal complaint.

I will endeavour to respond to you as soon as I can, and anticipate that I will have this information to you no later than 5 September 2022.

Please do not hesitate to contact me on either of the numbers below if you have any questions in-between.

Nga mihi



[Redacted] – Customer Resolution Officer
Customer Experience Team



Ph 04 912 4470 Mob [Redacted]

Private Bag 39804, Wellington Mail Centre 5045
Level 4, 25 Victoria Street, Petone, Lower Hutt

www.wellingtonwater.co.nz

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