

Please Quote File: 4352
SSAV

11 March 2022

Whangarei District Council
C/- GHD Limited
Attention: S Sunich
Email: sarah.sunich@ghd.com

Dear Madam,

S92(1) REQUEST FOR FURTHER INFORMATION

RESOURCE CONSENT APPLICATION APP.004352.01.07 – WHANGAREI DISTRICT COUNCIL – WHANGAREI WWTP

An initial assessment of your application has been made and the following further information is requested to better understand the consequences of the proposal, in particular the proposed conditions of consent to avoid and mitigate adverse effects on the environment:

- (1) The application states “that over the Whangārei WWTP planning horizon considerable uncertainty exists associated with [among other things] Whangārei city growth”¹. However, the application also states that the level of certainty/understanding associated with population growth forecasting is reasonable.²

Can you please clarify or provide further comment on the level of uncertainty associated with the high population growth scenario that is adopted in the resource consent application, and appended Master Plan Report (Appendix H), to predict future average daily inflows to the Whangārei Wastewater Treatment Plant?

- (2) The Master Plan Report (Appendix H) states ‘...the treatment plant has performed well throughout the past few years, particularly with respect to “medium” (21,000 to 30,400 m³/day) and “high flow” conditions (30,400 to 57,400 m³/day) described in the 6 monthly resource consent monitoring reports prepared by NRC over this period.’³ It is understood that Whangarei District Council (WDC) will be upgrading the WWTP with augmentation works by 2024/2025 to “increase plant performance and resilience to meet existing consent discharge limits, focusing particularly on improved treatment of ammonia, suspended solids, pathogens and odour management.”

¹ GHD Ltd. 13 December 2021. Whangarei Wastewater Treatment Plant Discharges – Resource Consent Application and Assessment of Effect on the Environment, page 31.

² Ibid, page 32.

³ GHD Ltd. 15 October 2021. Whangarei WWTP Consenting – Master Plan Report, Section 3.5

WDC proposes the use of preliminary water quality triggers until it develops long-term trigger levels. It is understood that the preliminary trigger values will be used to assess consent compliance over the preliminary two-year baseline monitoring period (i.e. “Within six months of the granting of the consent and for a minimum period of 12 months and a maximum period of 18 months, the quality of treated wastewater, receiving water and sediment environment”⁴).

Based on the assessment that the WWTP is generally performing well, is very unlikely to come under population growth pressures in the next couple of years, and augmentation upgrade works will be implemented shortly, what is the practical purpose of the preliminary trigger values?

- (3) WDC proposes that preliminary trigger values will be developed as part of a Receiving Environment Management Plan, a sub-plan to an Adaptive Management Plan. Appendix E to the application sets out preliminary water quality trigger levels and preliminary WWTP mass discharge trigger levels derived from existing data sets.⁵

Can you please clarify why you consider that up to six months is required to derive preliminary trigger values when they have already been derived and proposed?

- (4) Appendix E to the application sets out proposed monitoring of the WWTP discharge and receiving environment during the interim “period for the purpose of monitoring against the preliminary trigger levels”⁶. Proposed Condition 5 requires monitoring of the quality of treated effluent and the receiving environment to be implemented within six months of granting of consent.

Is there a reason why such monitoring, as set out in Section 9.5 of Appendix E, could not begin upon commencement of a consent?

- (5) Proposed Condition 2 would require WDC to, within six months of consents being granted, prepare four management plans (i.e. Operations and Maintenance Management Plan, Odour Management Plan, Wastewater Irrigation Management Plan, and Adaptive Management Plan).

Is there an existing Operations and Maintenance Management Plan (or similarly named plan) and/or Odour Management Plan (or similarly named management plan) that cover most or all the matters in Schedule 1 to the proposed conditions?

You are required to respond to the council within 15 working days from the date of this letter, being **Friday, 1 April 2022** in one of following three ways:

⁴ GHD Ltd. 13 December 2021. Whangarei Wastewater Treatment Plan Discharges – Resource Consent Application and Assessment of Effect on the Environment, page 84.

⁵ GHD Ltd. 8 October 2021. Whangarei WWTP Consent Application – Water quality and public health risk assessment, Section 9.3.5.

⁶ Ibid, Section 9.5.

- Provide the further information; or
- Advise the council in writing that you agree to provide the further information; or
You should choose this option if you are unable to provide all the further information by the date specified above. Please contact me as soon as possible to discuss an appropriate alternative date.
- Advise the council in writing that you refuse to provide the further information.
If you refuse to provide the further information, the council is required to publicly notify your application.

The processing of your application will be placed on hold from the date of this letter to the date of receipt of the further information or, if you refuse to provide the further information, the date the advice of refusal is received by the council.

Please note that the council has the ability to decline your application on the grounds that it has insufficient information to determine the application.

The requirements outlined above are binding on you being the applicant, as well as on the council. Your opportunity to clarify or question the reasonableness of this further information request occurs within the next 15 working days, not at some later date.

Please contact me should you have any questions.

Yours faithfully



Stuart Savill
Consents Manager