

Information supporting SUBMISSION FROM NORTHLAND CONSERVATION BOARD including comment on the NORTHLAND REGIONAL COUNCIL STAFF REPORT (the NRC Report)

NRC APPLICATION NO: APP.003839.01.03

APPLICANT FAR NORTH DISTRICT COUNCIL

LOCALITY: KOHUKOHU

The Northland Conservation Board (the Board) has grave concerns with regard to the conclusions and recommendations made to this hearing in the NRC Report.

It would appear that neither the Applicant's consultant planner (OPUS) nor the Consent Authority (Northland Regional Council (NRC)) has made a site inspection, let alone a cursory desk top examination of the catchment to understand the Hokianga Upper Harbour Catchment.

Our examination of the S92 requests for further information shows that the Consent Authority has not questioned the fundamental assumptions that the Applicant has made in the application. In particular the Applicant's assertions regarding the hydrology of the receiving environment and assumptions regarding baseline water quality. These are so fatally flawed that this hearing should not proceed.

The Applicant's submission also makes no mention of the back eddy effect at the WWP outlet. Those who live on these shores of the Hokianga Harbour will see logs and loose boats drifting around the upper harbour in opposite direction to the main flow and not exiting directly through the Narrows as implied.

The NRC Staff Report (P6, 3. SITE DESCRIPTION reference 2), accepts the Applicant's site description which is summarised as "***The WWTP is constrained between the Utaura River upstream and the Hokianga Harbour downstream***". This is not correct. Neither is the assertion that the Applicant made that the water quality monitoring results from a sampling point on the Utaura River, some 12 km from the Kohukohu WWTP are representative for the point immediately upstream of the Kohukohu WWTP. This assertion, made in the Applicant's submission prepared by OPUS is risible. Even a casual observer will note that approximately 1 km above the Kohukohu WWTP the waters of the Utaura River have been mixed with the comparatively vast catchments of the Waihou, Orira, Mangamuka and Wairere rivers. The inferred data is unacceptable.

The Board submits that the Applicant has failed to present any relevant data to establish baseline upstream water quality. In fact the information presented is misleading. That the NRC Staff report has failed to pick this up casts significant doubt over the balance of NRC Staff report and the "science" of the Applicant's submission?

RELIEF SOUGHT

At this point the Board considers that if the hearing proceeds an interim decision should be made to grant a 3 year extension to the current Kohukohu WWTP Resource Consent, conditional on the installation of an effective 2log UV Disinfection plant within three months of the decision. Reason: three years is more than sufficient time for a motivated TLA (FNDC) applicant to fully investigate, consult and prepare WWTP RC submissions for both the Kaikohe and Kohukohu WWTPs that include UV disinfection and disposal of treated effluent to land.

The Board is concerned that the Far North District Council, an RMA Consent Authority in its own right has 'managed' the consenting processes for the three upper harbour waste water treatment systems in a manner that avoids consideration of cultural violation and accumulative effects in the gross. I.e for the Rawene, Kaikohe and Kohukohu WWTPs.

This has been further exacerbated by the abuse of the Kaikohe Waste Water Treatment plant by FNDC, in violation of the resource consent, by dumping the sewage sludge from Kerikeri WWTP and septic tank cleaning from the Mid North generally. The system was designed for a population of 4000 people but has ended up coping with approximate loading of 27000 people. Charitably, the Kaikohe system can be described as primitive in its effectiveness.

We will explain. We contend that because of the virtually concurrent lapsing of the Rawene, Kaikohe and Kohukohu WWTP RCs, all should have been considered together. At the time of the preliminary processing (consultation stage) for the Rawene WW discharge consent a number of affected people stated that their preferred option was for the treated effluent to be discharged to land. FNDC's response was to change the Council's long standing policy of funding both the capital and operating costs for WWT plants from district-wide rating to district-wide for Opex only. This is after decades of district-wide funding of WWTP system's Capex and in particular for the East Coast WWTP new systems.

That this funding manoeuvre is in the process of being reversed by the current Council should be confirmed before a determination for this application is made.

The Applicant, FNDC has also failed to identify in their submission's AEE, the considerable use and benefit that the Kohukohu public toilets are to a large travelling public on the Twin Coast Discovery route via the Hokianga ferry, or that Kohukohu's relatively extensive municipal facilities serve quite a wide rural community. There is a wider public benefit from the Kohukohu WWTP.

RELIEF SOUGHT Accept that the current FNDC's policy on wastewater infrastructure that requires that each scheme must pay its own costs was born in challengeable circumstances during a disengenuous consultation process WRT the Rawene WWTP, and is at odds with both FNDC and the Government's policy direction; AND therefore should not be referenced in this hearing.

DISCUSSION 1. Ecoli counts in baseline water as used by the Applicant are disingenuous. Future references to ecoli need to differentiate between Human source ecoli (with a relatively high indicative human pathogen level expectation and ecoli from other animals with a relatively low zoonotic pathogenicity.

2. Salinity levels vary considerably according to seasonal and flood fresh water flows. The precautionary approach must require that the receiving environment is treated as fresh water

Subject: RE: Kohukohu WWTP
From: "John Vujcich" <John.Vujcich@fndc.govt.nz>
Sent: 17/05/2023 7:16:24 p.m.
To: "Joe Carr" <joe.kate.carr@gmail.com>;

Joe,

I asked Janice and got a note saying the depreciation reserve as of 30 June 2022 is \$596,522

Joe, remember that the Kohukohu scheme was fully paid up by the residents with a grant from the ministry of health I believe. It seems wrong that the community had and continues to depreciate the scheme. This effectively nullifies the government grant and is inconsistent with the approach taken by council to spread the costs of the scheme over the life of the plant and multiple generations.

John Vujcich
Councillor
Far North District Council, Far North District Council
| John.Vujcich@fndc.govt.nz
www.fndc.govt.nz

-----Original Message-----

From: Joe Carr <joe.kate.carr@gmail.com>
Sent: Tuesday, May 9, 2023 9:01 PM
To: John Vujcich <John.Vujcich@fndc.govt.nz>
Subject: Kohukohu WWTP

CAUTION: This email originated from outside Far North District Council.
Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Cr Vujcich please send me the current Depreciation Reserve Balance for the Kohukohu Sewerage Scheme

Kind regards Joe Carr

Get it done online at your convenience, visit our website - www.fndc.govt.nz

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