

Please Quote File: APP.002417.01.04

12 June 2025

Far North District Council
C/- Ben Tait
Beca
Via email: ben.tait@beca.com

Dear Sir or Madam

S92(1) REQUEST FOR FURTHER INFORMATION

**RESOURCE CONSENT APPLICATION APP.002417.01.04 – Far North District Council –
Continued operation of and upgrades to the Kaikohe WWTP**

An assessment of your application and submissions received has been made and the following further information is requested pursuant to section 92(1) of the Resource Management Act 1991:

- (1) Please provide a volunteered timeframe in which the WWTP upgrades will be implemented/constructed and commissioned.

Timeframes for the upgrades would be recommended to be imposed as consent conditions. These conditions will need to be realistic and achievable for the applicant.
- (2) Please provide confirmation, or otherwise, that the Applicant has sufficient approved funds (i.e. through the Council's Long Term Plan) for the proposed upgrade works to be implemented/constructed within the timeframes proposed in answer to Question (1).

This is requested as part of understanding whether the timeframes provided are realistic and achievable.
- (3) Please provide a summary table which shows:
 - a) the quality of the existing discharge (including any anticipated changes between now and when the upgrades are commissioned);
 - b) the quality of the discharge following the upgrade works;
 - c) the quality of the discharge in the year 2060 (based on forecasted population increases served by the WWTP).

The summary table should include statistics such as median and 95%ile concentrations for the determinands that are required to be monitored per

Schedule 1 of the existing consents (i.e. pH, five-day biochemical oxygen demand (BOD₅), total suspended solids (TSS), total ammoniacal nitrogen (TAN), dissolved inorganic nitrogen (DIN), total nitrogen (TN), total phosphorus (TP), dissolved reactive phosphorus (DRP), and *Escherichia coli* (*E coli*)).

Expected discharge quality standards have not yet been confirmed. These discharge quality standards are likely to form recommended conditions of consent.

- (4) Please provide an up-to-date summary of all the receiving water quality monitoring required to be undertaken by Schedule 1 of the existing consents. This information should be presented as a time series and paired sample assessment statistics.

Information regarding compliance with the existing consent conditions should be clearly presented in order to recommend appropriate conditions for the current application.

- (5) Please provide an updated Quantitative Microbial Risk Assessment (QMRA) which assesses human health risks following the proposed upgrade of the WWTP compared to the risks that exist from the current discharge, including an assessment of the current viral removal rates (log reductions) and expected rates following the upgrades.

*Compliance with the 540 *E coli*/100 mL (95%ile) water quality standard stated in the application does not necessarily mean contact recreation risks are acceptable, especially for sites downstream of WWTP discharges. A QMRA is an appropriate tool for assessing human health risks from a WWTP discharge. Although the application states that an improvement in viral removal is expected, the application does not currently confirm the viral removal rates.*

- (6) Please provide further information on the zone of reasonable mixing and whether acute toxicity effects on aquatic ecosystems may occur within this zone. Consideration of the provisions of the Proposed Regional Plan should be made, in particular the definition of the zone of reasonable mixing and Policy D.4.4.

The report in Appendix B included a dye study which visually defined 'the mixing zone', being the point where 'full mixing' of the discharge occurs. It should be noted that the zone of reasonable mixing does not automatically equate to full mixing. The current consent specifies a mixing zone of 80 m (condition 7).

The Proposed Regional Plan states that regard must be had to using the smallest zone necessary to achieve the required water quality in the receiving waters and to ensure contaminant concentrations within the mixing zone will not cause acute toxicity effects on aquatic ecosystems. There is currently insufficient information to assess these matters.

- (7) Please provide information on the extent of wastewater seepage from the unlined components for the current WWTP as well as following the upgrades. Please also provide a description of the pathway of any wastewater seepage, both into

groundwater and downgradient to any surface water, and an assessment of effects of such seepage.

The existing consents authorise the discharge of treated wastewater via seepage from unlined components of the WWTP, and the current application will need to account for this as well. The information is needed to understand the extent of seepage and assess the effects.

- (8) The application notes that the upgrades will generate sludge and this may be taken off-site or managed onsite. Please advise if consents are being sought (if any are required) for the onsite management of the sludge.

If consents are required for the management of sludge it would be preferable and efficient to include this within the current application.

- (9) Please provide a set of draft set of proffered conditions for consideration, including commitments on timeframes and discharge standards to be met before and after upgrade, and a proposed monitoring programme (including diagrams/maps which clearly show compliance and monitoring points).

The conditions will be a critical part of ensuring that intended environmental outcomes are achieved; it would be most efficient for the Applicant to proffer these first and the s42A author to respond.

- (10) Please advise the value of the applicant's investment in the Kaikohe WWTP.

The value of investment needs to be taken into consideration under s104(2A) of the RMA.

- (11) Please provide responses/updates on other matters and/or concerns raised in submissions including:

- a) Effects on trout habitat
- b) Avian botulism risk
- c) Odour management
- d) Consent duration
- e) Continued hapū engagement / input

This will allow for the applicant's responses to be taken into account in the officer's report.

You are required to respond to the council within 15 working days from the date of this letter, being 11 July 2025, in one of the following three ways:

- Provide the further information; or
- Advise the council in writing that you agree to provide the further information; or
- Advise the council in writing that you refuse to provide the further information.

The information is required in order to gain a proper understanding of the effects of the application. Please note that the council has the ability to recommend declining your application on the grounds that it has insufficient information to determine the effects of 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



Emily Buckingham
Consultant Planner

Emily.buckingham@slrconsulting.com