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BTAI:ASLU

11 September 2025

Far North District Council  
Attention: Louise Wilson, Senior Infrastructure Manager  
Delivered by email: [louise.wilson@fndc.govt.nz](mailto:louise.wilson@fndc.govt.nz)

Dear Louise

**S92(1) REQUEST FOR FURTHER INFORMATION**

**RESOURCE CONSENT APPLICATION APP.007203.02.03 – FAR NORTH DISTRICT COUNCIL –  
DISCHARGE WATER AND CONTAMINANTS FROM WHATUWHIWHI WASTEWATER TREATMENT  
PLANT**

An initial assessment of Far North District Council's (FNDC's) application to discharge treated wastewater from the Whatuwhiwhi Wastewater Treatment Plant (WWTP) has been undertaken. To better enable consideration of actual and potential effects of the proposal, particularly on the ecologically and culturally significant Waimango Swamp, further information is required as outlined below.

All information should be prepared by a suitably qualified experts, with all assumptions clearly stated.

**Current Ecological Assessment**

(1) Provide a current quantitative ecological assessment of the near field wetland receiving environment, including the following, using a methodology that is consistent with, or builds upon, previous Wildlands Consultants protocols (2016 & 2019):

- An evaluation of vegetation composition, nutrient content (nitrogen and phosphorus), water depth, and other relevant ecological indicators within both control and impact zones.
- Interpretation of any observable shifts in eutrophic indicator species (e.g. raupō) or other relevant ecological indicators.

*Reason: A current quantitative ecological assessment is requested to ensure that consideration of effects from the proposed discharge reflects the existing environmental conditions.*

(2) Provide an evaluation of any observed shifts in plant communities since establishment of the WWTP, using ecological survey data, other literature and/or aerial imagery, especially replacement of low nutrient assemblages by species adapted to elevated nutrient conditions (e.g. flax, raupō, rushes).

*Reason: This information is requested to provide an up-to-date understanding of the wetland's current condition and to detect any changes that may have occurred since the WWTP was established.*

### **Open Water Quality Assessment**

(3) Please provide a summary of any existing data or knowledge on open water quality in the Waimango Wetland (beyond the immediate vegetated discharge zone), with respect to total nitrogen, total phosphorus, and chlorophyll-a. Where recent data are lacking, please outline your proposed approach for characterising water quality. This may include a plan and timeframe and for sampling and analysis, or expert judgement based on comparable environments.

*Reason: This information is requested to assess nutrient status and potential eutrophication risks within the wider Waimango Swamp environment.*

### **Cumulative Nutrient Load Assessment**

(4) Provide an assessment of cumulative nutrient loads (nitrogen and phosphorus) to Waimango Swamp including:

- Identification of all key catchment sources contributing nutrients to the wetland.
- Estimates or discussion on the relative contributions from each source, where possible.

*Reason: This information is important to contextualise nutrient loads from the proposed discharge relative to other sources and understand the sensitivity of the receiving environment. It is noted that FNDC's application states cumulative effects could not be considered due to insufficient information (see WSP. May 2025. Whatuwhiwhi Wastewater Treatment Plant Water Quality Assessment).*

### **Risk-Based Effects Assessment**

(5) Please undertake a risk-based assessment of potential effects arising from WWTP nitrogen and phosphorus loads on the Waimango Swamp, using a recognised likelihood-consequence framework. The response should include:

- An evaluation of current water quality status and trophic classification of the swamp. If direct monitoring data are insufficient, base your assessment on expert judgement or comparable waterbodies.
- An assessment of whether proposed ongoing nitrogen and phosphorus loads from the WWTP may shift the swamp's trophic classification, with discussion of associated ecological implications. This should include consideration of risks such as cyanobacterial blooms or other adverse ecological outcomes within the Waimango Swamp.

*Reason: This information is requested to inform understanding of the potential risks to wetland health arising from nutrient inputs associated with the WWTP discharge, particularly whether these could cause measurable changes in ecosystem function or trigger harmful events such as algal blooms.*

### **Proposed Discharge Quality Standards**

(6) Please describe the rationale for the proposed discharge quality standards for Biochemical Oxygen Demand, Total Suspended Solids, *E. coli*, and Total Ammoniacal Nitrogen. In your response, please explain how these standards have been determined in relation to water quality-dependent values within the receiving environment.

(7) Considering your response to Question 5 above, please comment on whether it would be appropriate to propose specific discharge quality standards for total nitrogen and/or total phosphorus.

*Reason: This information is requested to better understand how the proposed standards will avoid or mitigate adverse effects on the environment.*

#### **Assessment of Discharge Alternatives**

(8) Please detail whether alternative methods for discharging treated wastewater to land have been considered as part of the application process. If such alternatives were evaluated, summarise their environmental, economic, and practical viability.

*Reason: This information is required to address the requirements of Policy D.4.3 of the Proposed Regional Plan for Northland (PRPN), and to demonstrate that all reasonable discharge options have been properly assessed. It is noted that the current application seeks consent to discharge to water.*

*For reference, Policy D.4.3 of the PRPN states:*

*An application for resource consent to discharge municipal, domestic, horticultural or farm wastewater to water will generally not be granted unless:*

- 1) *the storage, treatment and discharge of the wastewater is done in accordance with recognised industry good management practices, and*
- 2) *a discharge to land has been considered and found not to be environmentally, economically or practicably viable.*

#### **WWTP Capacity and Performance**

Section 4.3 of the Options Assessment<sup>1</sup> (Appendix J of the Consent Application and Assessment of Environmental Effects) states:

*The current estimated loads exceed the W-WWTP's 2008 design capacity and given that the plant is still in its 2008 configuration it means that the **current loads exceed the current available capacity**. The W-WWTP was designed for phased addition of Aquamats and a third blower which would have catered for an ultimate 2026 capacity, but this has never materialised.*

*The forecast 2059 loads are well within the WWTP's 2016 design capacity, therefore with the addition of the extra Aquamats as well as the third blower envisaged with the original 2016 upgrade the plant would have capacity for treating the loads out to 2059 based on the current consented required effluent quality standards. [My emphasis]*

(9) Please confirm the timeframe by which FNDC will decide on upgrading the WWTP to address the existing plant capacity issue.

(10) Please clarify whether FNDC has considered potential future wastewater flows from all local development provided for under the operative and proposed versions of the Far North District Plan such as the proposed Carrington Estate subdivision in its planning for WWTP capacity and discharge management, and if so, how these have been accounted for in assessing potential effects.

*Reason: Understanding the timing of capacity upgrades is requested to better consider the effects of the proposed discharge and assess whether the current proposal could be*

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<sup>1</sup> WSP. 28 May 2025. Whatuwhiwhi WWTP Best Practical Options – Options Assessment. Prepared for Far North District Council.

*compromised by additional loads or might require further upgrades within the duration of the sought consent.*

**National Environmental Standards for Freshwater 2020**

(11) Please provide an assessment of the proposed discharge against the relevant regulation and conditions of the National Environmental Standards for Freshwater 2020, specifically Regulation 46 and 47.

*Reason: The AEE provides an assessment of the proposed activity against Regulation 54(d), whereas Regulations 46 and 47 apply to the maintenance and operation of specified infrastructure and other infrastructure.*

You are required to respond to the council within 15 working days from the date of this letter, being **Thursday 2 October 2025** in one of following three ways:

- 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



Ben Tait  
Consultant Planner  
[Ben.Tait@gmail.com](mailto:Ben.Tait@gmail.com)