

Please Quote File: 2667

22 July 2019

Jessica Crawford
Far North District Council

Dear Madam

**S92(1) REQUEST FOR FURTHER INFORMATION:
RESOURCE CONSENT APPLICATION APP.002667.01.04
FAR NORTH DISTRICT COUNCIL – DISCHARGES ASSOCIATED WITH
OPONONI/OMAPERE WASTEWATER TREATMENT PLANT (WWTP)**

An initial assessment of your application has been made and the following further information is requested:

- 1 A copy of Met-Ocean Solution's hydrodynamic study report within one week of it being received by applicant.
Reason: To allow a more complete assessment of the effects of the discharge, particularly any cumulative adverse effects.
- 2 If the Met-Oceans Solution's hydrodynamic study report shows that the discharge will leave the main channel of the harbour, then the applicant shall identify recreational swimming and food gathering areas that are within the area between where the discharge leaves the channel and the shore. A quantitative microbiological risk assessment of the level of risk to public health shall be undertaken for these identified areas. If there is a quantifiable risk to public health in an area, then the assessment shall recommend mitigation measures to reduce this risk to an acceptable level. This assessment must be completed within three months of the Met-Ocean Solution's report being received by the applicant.
Reason: To allow council to properly assess the risk to human health from the discharge.
- 3 A report on land disposal options for the wastewater which provides details of the cost and viability for each option. This report should provide a decision on whether land disposal is to be undertaken for this discharge and the reasons for that decision.
Reason: This is to meet Policy D.4.3(b) of the Proposed Regional Plan which states a discharge to water will generally not be granted unless "a discharge to land has been considered and found not to be economically or practicably viable". Policy 23(2)(b)(i) of the New Zealand Coastal Policy Statement also requires that "there has been adequate consideration of alternative methods, sites and routes for undertaking the discharge".

- 4 The application acknowledges that:
- (i) the Hokianga Harbour is a statutory acknowledgement area; and
 - (ii) the discharge of sewage to water is culturally offensive; and
 - (iii) there is Hapu Environmental Management Plan that covers the area of this the area of the discharge.

The application then concludes that the adverse effects on the cultural values of the Hapu are less than minor. The application however does not present any assessment of adverse effects on tangata whenua, and their values and resources, to validate this conclusion. It also does not present any assessment of the effects on the statutory acknowledgement area. It is therefore requested that an assessment be undertaken on the effects on tangata whenua values and resources by the discharge to the CMA. As minimum, this assessment should be undertaken in accordance with criteria of Policy D.1.2 of the Proposed Regional Plan.

Reason: This is to allow the council to determine which tangata whenua are adversely affected by the application in accordance with Policy D.1.3 of the Proposed Regional Plan and to provide potential means of mitigation of any adverse cultural effects. It will also allow council when making a decision on this application to meet the requirements of Policy 23(2)(b)(ii) of the New Zealand Coastal Policy Statement which only allows a discharge of treated sewage to coastal water if it is “informed by an understanding of tangata whenua values and the effects on them”.

- 5 Where the outcome of questions 1, 2, 3 and/or 4, or a combination thereof, above identify at least a minor adverse effect to the environment because of pathogens in the wastewater discharge, an investigation and report into potential upgrade options for pathogen reduction in the discharge shall be provided. This should include any improvements to the current WWTP that would improve the effectiveness of pathogen reduction in the discharge. The report on this investigation should incorporate the outcomes of the assessments and reports required by questions 1 to 4 above and shall provide a preferred upgrade option for the WWTP.

Reason: To allow council to assess what methods are available to the applicant to mitigate any adverse effects. This information is also a requirement of Policy 23(2)(b)(i) of the New Zealand Coastal Policy Statement which requires that “there has been adequate consideration of alternative methods, sites and routes for undertaking the discharge”.

The assessments and subsequent reports required by 2 to 5 shall be undertaken by suitably qualified persons in the field of the requested information.

You have agreed to supply this further information by **31 March 2020**. The processing of your application will be placed on hold from the date of this letter until this agreed date, or the date of receipt of the further information, whichever occurs first.

Once the Council has received the further information, it will then make a decision on whether your application requires notification.

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.

Please contact me should you have any questions.

Yours faithfully



Stuart Savill
Consents Manager