

Russell Protection Society (inc)
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Russell, Bay of Islands

Joint Hearing Bay of Islands Community Wastewater Scheme

Application Number: CON20060110804 NRC
RC-2070597-RMADES FNDC

Statement of Evidence by Martin Leiding on behalf of the Russell Protection Society INC (supported by Bay of Islands Coastal Watchdog Inc and the Russell Ratepayers & Citizens Association Inc).

Introduction

The Russell Protection Society is an organization representing relevant aspects of the public interest. We have an interest in environmental matters within the Far North District Council's jurisdiction and are particularly concerned with the protection of existing amenity and historic values on the Russell Peninsula and any other area that may effect the amenity and heritage values of the peninsula. Our Society has invested a considerable amount of resources in order to ensure the District Plan is appropriate for the historic Russell Peninsula.

The Russell Protection Society made a submission in opposition to the application by Far North District Council to alter existing designation FN 169 and to develop and operate a proposed "Bay of Islands Community Wastewater Scheme" that has the capacity to treat and discharge 10200q/m per day of wastewater from Kerikeri, Waipapa, Paihia, Waitangi, Opuia, Haruru Falls, Russell and their environs.

We are opposed to the mega-scheme concept to provide and pay for infrastructure for 50000 people while there are less than 11000 people currently living in the potential area of benefit, many of whom may never be connected to reticulation because of distance or topography, this is a rural environment after all.

Our opposition to the scheme relates to all areas **outside** the Kerikeri-Waipapa-Structure-Plan boundaries and Paihia-Opuia areas.

The reasons for the Society's objection are as follows:

1. We think the proposal is contrary to the purpose and principles of the RMA, to promote the sustainable management of natural and physical resources, and that it is contrary to the FNDC's District Plan, aiming to promote sustainable development, to preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use and development.
2. One of our main concern is that the application for 10200q/m per day will invite inappropriate, Auckland type intensive ribbon development along the reticulation lines. It will serve to undermine District Plan provisions, which are designed to achieve outcomes that are compatible with the special environment and amenities residents and visitors alike enjoy and value. This special environment and the associated amenities are also part of our economy.

3. We believe that one of the cumulative adverse effects will be that the provision for the proposed infrastructure will facilitate intensive development over and above what is expected and agreed to in the District Plan when applicants will argue successfully in future that the FNDC anticipated intensive growth in coastal regions of the Bay of Islands by providing the wastewater infrastructure for 50000 people.
4. The planning report (Page 105) states that the population projection used in determining the flow of 10200q/m per day were based on a high growth scenario and would most likely not be reached prior to expiry of the consent. Which means a lower discharge would be sufficient.
5. We do not understand why this application is based on a (very) high population growth model when it would be easier and arguably cheaper to apply for less daily discharge, since this would reduce potential of adverse environmental effects. The population projections used to support the proposal appear to represent the applicant's aspirations for the unsustainable intensification of the Bay of Islands.
6. The alternatives to the current proposal have not been satisfactorily investigated. Especially a rigorous examination of alternatives to the single mega-plant has not been seriously conducted.
7. Many submitters favour the use of satellite plants for small communities, designed for their needs and expected growth, as per District Plan, and to retain their local character and amenities.
8. FNDC consultation with the coastal communities 4 years ago resulted in a clear mandate from the public to develop small, local systems or to remain on on-site treatment systems.
9. The applicant now claims that disposal to land is too expensive because of the high purchase price of land. The FNDC appears to claim this every time when one of its sewerage plants need consent renewal. Therefore smaller plants, or a combination of alternative solutions, are never seriously considered and calculated on realistic growth rates. A fundamental error has also been made in limiting the investigation of disposal options to an area within a 5 km radius of the WWTP site.
10. Land based disposal would be a serious step towards sustainability. Real sustainability would be achieved by onsite treatment and disposal. Collecting all the effluent in one place makes it much harder to do anything else in future should new technologies become available, hence we think that smaller plants and onsite treatment systems are more appropriate for the BoI.
11. We question the costs quoted by the Council's consultant for alternative treatment. The cost for a onsite aerated treatment system is rather \$10,000 to \$12,000 for a complete connection. Their quoted total costs for decentralised plants from \$52.2 million to \$70 million are not itemised, one would think that a smaller plant with a smaller reticulation network would not cost more than the mega-scheme alternative. The connection costs and yearly service charges are also not taken into consideration. The average

connection to the Russell sewerage scheme did cost home owners \$2000, in some cases considerably more. It is not true that onsite disposal is more expensive than reticulation. The daily running costs for the mega-scheme have also not been taken into consideration.

12. For 3 years now the FNDC has a bylaw that requires septic tanks to be cleaned and serviced every 3 years and a 'Septic Tank Maintenance Report' being issued by the cleaning contractor. This gives Council all the tools it needs to identify failing septic tanks and getting them fixed, which is often only a matter of upgrading or cleaning the drainage field. The Council could deal with failing septic tanks if they really wanted to. Various figures between 10% and 20% of failing tanks have been quoted, giving the impression that the quoted figures are estimates only. We object to the FNDC using failing septic tanks as the scapegoat to justify this big scheme when a combination of solutions would be the cheaper and sustainable option. Educating the public how to look after onsite treatment systems could be part of the solution too, we have raised this with the FNDC many times in the past.
13. It is therefore wrong to use current sewerage problems in Kerikeri, which have been neglected for 10 years while the Council allowed for more development, as a rationale for pushing ahead with a single mega-plant approach.
14. It is also wrong to use costs associated with obtaining resource consents for satellite plants as a rationale for pushing ahead with a single mega-plant approach. This is not in the spirit of the RMA or good planning practices.
15. The risk and consequences of failure of a large reticulation network and a single treatment and discharge site are underestimated. We note that numerous pipeline breakages and emergency discharges have occurred in the recent past, particularly during the increasing periods of extreme weather conditions.
16. The application is only for the discharge of average dry weather flows and does not state the the anticipated total peak discharges including wet weather and emergency. The application does not properly note how extreme weather events will have a direct effect on the extensive reticulation network.
17. Under this proposal raw sewage will be transported considerable distances and the effects of breakages will be much more significant than under the present situation where wastewater is treated near its source and discharged locally.
18. These long pipelines will often be located in isolated rural areas and therefore breakages can go unobserved for longer periods of time, as has happened recently.
19. There are also a large number of pumping stations required under this proposal and all of these will need a allowance for emergency discharge permits to discharge raw sewage to the surrounding environment during extreme weather events such as 29 March 2007.
20. Any malfunction of the proposed single treatment plant will have serious impacts.

21. The Waitangi Wetlands have a conservation covenant, meaning they are protected and should also be managed for their conservation values. The existing discharge from Paihia has made already a significant change to a more nutrient enriched wetland.
22. The proposal should be considered as a direct discharge to the marine environment because during peak flows there is a direct connection between the wetland and Kerikeri Inlet.
23. The Inlet is the food basket for Tangata Whenua and it is culturally insensitive to dispose of all of the Bay of Islands human waste in that area, especially when proper investigations of land disposal options have not been carried out.
24. It is also noted that oyster farms are established in the Kerikeri Inlet and this could raise similar liability issues to those which occurred in the Waikare Inlet, should this mega-plant malfunction.
25. The Russell community has just invested some 13 million dollars on a new sewerage scheme. The proposal could result in the abandonment of this sewage treatment plant, despite the fact that it produces very high quality effluent.
26. This does not represent an effective and efficient use of scarce resources, especially ratepayer's money.
27. The current Russell Sewerage Scheme effectively utilises land disposal and the Riley report indicates potential for expansion of this concept. The application has also not properly investigated other opportunities for land disposal on the Russell Peninsula.
28. The investigations of alternatives for Russell are based upon an out of date report done by Fraser Thomas consultants. This work was subsequently called into question by a decision of the Environment Court on the Russell Sewerage Scheme in 1995.
29. Furthermore, the application refers to a report by MWH consultants without referring to an audit of that report done by Opus consultants.
30. The Applicant has also chosen to ignore a request made by the Russell Executive, and a proposal by Riley consultants, to conduct a proper study of longer term alternatives for the disposal of Russell's sewage.
31. The design of the Russell bores is intended so that replacement bores can be drilled in between two bores should one fail to maximise the life of the system, the bores are monitored very regularly and there is no indications of failure. If maintained and run as intended the Russell sewerage system can last for a very long time.
32. The proposal is based upon faulty or out of date information regarding Russell. The calculation of projected volumes of wastewater is wrong.
33. The Opus and Riley reviews of the MWH report made a number of recommendations that are aimed at extending the life for the Russell Sewerage Scheme, including the boreholes. Most of these recommendations have been actioned and as a result the

ongoing monitoring programme indicates that this scheme is operating satisfactorily and is likely, with proper management, to meet the projected needs of Russell for the foreseeable future.

34. The proposal assumes that wastewater from Russell can be satisfactorily piped to the WWTP in Waitangi. No feasibility study has been produced by the applicant to demonstrate this, other than a passing comment in the application that it would be “a challenging project”, yet “technically feasible”.
35. Since the proposal for including Russell in the WWTP depends entirely on a pipeline across the Bay, it is necessary for the potential environmental effects of this to be adequately explored.
36. It is also questioned whether the lack of community water reticulation in Russell will impact on the feasibility of pumping raw sewage from Russell. This is also an issue for the wider Bay of Islands, because of the dispersed location of urban areas and the seasonal nature of its population the general lack of large amounts of stored water.
37. There are a number of consequential environmental and economic issues that are not addressed in the application.
38. The proposal appears to assume rapid growth of coastal communities on the Russell Peninsula and elsewhere in the Bay of Islands, without giving proper consideration to the water quality implications of this due to increased urban stormwater run off, siltation and emergency sewage overflow discharges.
39. Many individual coastal property owners have already invested heavily in sophisticated sewage treatment and discharge facilities such as the “Oasis system” under the direction of the Council.
40. These systems would be made redundant, while the owners would then be charged the "Sewerage Serviceable Targeted Rate" for their unconnected properties if they are within the expanded area to be serviced.
41. We think that the applicant has significantly under-estimated the costs of establishing the proposed reticulation network and treatment plant based upon the cost overruns that have occurred with other sewerage systems built by FNDC and the cost of the pipeline recently upgraded from Paihia to Haruru Falls.
42. This could have financial implications for the ratepayers and could result in a level of debt that would serve to compromise future economic, social and environmental objectives for the District and result in a high level of debt for infrastructure that is not needed.
43. This District Plan provisions for Russell fairly reflects community aspirations for the peninsula. The present rate of population growth on Russell Peninsula is low and therefore the pattern of zonings in the District Plan reflect this. The Russell township population grew from 1996 to 2006 by 27 people.

44. The applicant has applied for a single “mega-treatment plant” in the apparent hope of fostering the rapid growth of a “Bay of Islands City” concept. The capacity of the proposed treatment plant is roughly equivalent to that of Whangarei City. In taking such an approach, the applicant has largely ignored the purpose and principles of the Resource Management Act by not properly investigating alternatives that could deliver better and more efficient environmental outcomes.
45. In such a situation, the applicant has not undertaken proper consultation. The application appears to suggest that the limited LTCCP process undertaken by Council was a suitable substitute for community consultation on what is a crucial planning issue. It then goes further by misconstruing what the overwhelming bulk of submissions to the LTCCP had to say.
46. A clear message was given by the Russell community that they do not want expensive new infrastructure such as the WWTP scheme, or reticulated water supply and a bridge across from Opuia because they consider these things both inappropriate and unnecessary in the context of Russell Peninsula.
47. In previous consultations with Te Wahapu and Okiato property owners, a clear vote was taken against a reticulated sewerage scheme. Other coastal communities in the Bay of Islands have also provided similar responses.
48. On the basis of the reasons listed above, the proposal fails to achieve the purpose and principles of the Resource Management Act. It is inappropriate for the area concerned and represents poor and unsustainable resource management planning.
49. We note that the FNDC has allocated \$4200000 in its 2006/16 LTCCP for the Russell treatment plant to connect to the proposed scheme from 2012 to 2016. (Attachment)
50. We attach an article published in the Northern News on 17 September 08 to demonstrate to the hearings committee the tactics FNDC staff use by labeling to discredit opposing submitters. One wonders why they do that.

We ask the Hearings Committee to make the following decision:

Remove the words "Russell" and “their environs” from the proposed scheme description to exclude Russell and the wider Bol from the scheme.

Limit the proposal to allocated growth areas within the boundaries of the Kerikeri-Waipapa Structure Plan and Paihia to Opuia, subject to approval from the Kerikeri, Waipapa, Paihia and Opuia communities.

Reduce discharge permit to 4500q/m per day maximum. This will reduce many of the potential adverse effects and allow for realistic growth.

Clearly map all areas of benefit.

Rename the project to Paihia-Kerikeri-Wastewater-Scheme.

Red tape bogs down sewage treatment

By Richard Edmondson

Red tape and greenies are getting in the way of efforts to clean up waterways polluted by failing household septic tanks.

That was one of the messages given to reporters last week at a Far North District Council media briefing to highlight the need for a super sewerage plant in the Bay of Islands.

Wastewater and water

consultant Lars Fog estimated that more than 10 percent of on-site effluent disposal systems in the Far North do not function correctly.

As many as 450 systems could be failing in Kerikeri and Waipapa where soils were generally ill-suited for effluent disposal, he said.

"It's just known that systems in Riverview Rd don't work. "It all slips down into the Kerikeri Inlet

and it's not good."

Meantime, Kerikeri's wastewater treatment plant could only cater for half the population of more than 6000 which was expected to rise to 15,000 by 2021.

Despite the urgent need to improve the town's sewerage infrastructure, getting permission to upgrade and expand the Paihia wastewater plant in the Waitangi Forest was proving to be a long and costly exercise.

The council had spent about \$1 million on consultants' fees and reports for its resource consent application to the Northland Regional Council.

"We've been working on this for seven years," said Mr Fog.

It took the council 13 years to get a resource consent from the regional council to upgrade its wastewater plant at Hihi.

Also slowing progress was

the Conservation Department which opposed the council's plans to discharge treated wastewater at the expanded plant to an artificial wetland rather than to land.

"DoC always say no," said Mr Fog.

The council would need about 1220 hectares of land to allow continual land discharge of 10,200 cubic metres of treated wastewater a day, he said.

"At a minimum cost of \$20,000 per hectare, this will need a capital investment of \$24.4 million."

Treated wastewater from the plant would contain less than 10mg of faecal coliform per 100 ml, making it cleaner than untreated water that supplies the council's water treatment plants.

"There's no negative effect on the environment, because we're putting it out so clean."