

# SUBMISSION

The Secretary  
Northland Regional Council  
36 Water St  
Private Bag 9021  
Whangarei 0140

Email: [mailroom@nrc.govt.nz](mailto:mailroom@nrc.govt.nz)

Fax: 09 4380012

## 1. Person or body making submission

Name:

Postal Address:

Telephone:

Fax:

Mobile:

Email:

## 2. Address for Service of Submitter (if different from above)

Full name:

Postal address:

Telephone:

Fax:

## 3. Application to which Submission Relates:

**Applicant:** Whangarei District Council

**Proposal(activity type and location):**

Change Condition 16; Restricted Coastal Activity; Wastewater Treatment Plant

**NRC Application Number:** CON20090435202

## 4. General Nature of Submission:

In opposition of application

## 5. The Particular Parts of the Application this submission relates to:

The whole application

## 6. The reasons for making the submission are:

a. The WWTP lacks the capacity (even with the proposed upgrades) to provide anything other than minimal treatment of flows over 57,400m<sup>3</sup>.

b. The discharge to Limeburners Creek of increased volumes (up to 140,000m<sup>3</sup>) of minimally treated wastewater is going to cause further degradation of the water quality of the upper harbour that has a Coastal Bathing standard, and is used for contact recreation by significant numbers of our community. (Swimmers, waka ama, kayakers, sailors et al). We don't accept the defeatist attitude that the water quality of the upper harbour is already so compromised that this further contamination doesn't matter! We have an expectation that WDC who claim to be "Creating the ultimate living environment", actively work towards improving the water quality of the upper harbour to ensure the health and well being of its community.

c. After the proposed upgrade, the contaminants (both viral and bacterial) will still be present in the wastewater having received only primary treatment, and will cause a significant public health risk to those who have contact with the water, or who eat kaimoana.

d. WDC have provided no specific details of actions/budgets/timeframes to either further upgrade the capacity of the WWTP to provide secondary, advanced secondary, and tertiary treatment to any volumes over 57,400m<sup>3</sup> and/or reduce inflow to the wastewater network at any time in the future.

e. This application will not only increase the volumes of the barely treated discharge to Limeburners Creek, but will also increase the frequency and duration of these events. The original consent condition 16 was granted on the understanding that the Extreme Bypasses to Limeburners Creek would be temporary and infrequent in nature.

f. The continued desecration of Whangarei Terenga Paraoa waters is deeply offensive to Tangata Whenua.

g. The fouling of the harbour is also a cultural offence to the majority of our community.

h. Discharges to air: The odour already coming from the WWTP is overwhelming, and negatively impacting on the many businesses down Kioreroa and Port Rds. Given that the volumes over 57 400m<sup>3</sup> will only receive anaerobic treatment, this application will increase this odour.

i. This application goes against the four cornerstones of wellbeing the WDC are legally obliged to uphold. Further, it negatively impacts on the sustainable management of natural resources.

j. The Whangarei Harbour cannot continue to absorb the pollutants the WDC continue to discharge in both raw and partially treated overflows.

## 7. Decision Sought from the Council on the Application:

To refuse consent

If consent is granted, the conditions I seek are:

- a. Given that the network modelling research results, undertaken by WDC, are unavailable prior to the submission close date, I ask that: NRC seek the reports of network and harbour modelling from WDC; that hearing the application be delayed until these reports are available; that the reports be made available to all submitters for comment prior to and during the hearings.
- b. WDC be required to reduce volumes of waste water coming into the WWTP.
- c. WDC increase the capacity of the WWTP to fully treat any volumes of waste water received prior to discharge.
- d. WDC test water outflows after it leaves the wetlands at Limeburners Creek and the entry point to the upper harbour, several times over two days after a bypass event. NRC to stipulate the contaminants to be screened for in the water quality testing. Additionally NRC to stipulate contaminants to be screened for in sediment samples and the sites for collection.
- e. A working party is established that includes representation from WDC, NRC, Northland DHB, Manaia PHO, Tangata Whenua, Save Our Harbour and any other key stakeholders NRC identifies. This group is to collaboratively engage, and analyse collectively the issues, data, and options for resolving the significant problems with the Whangarei Wastewater/ Stormwater network. Further, this group to develop a strategic plan/framework that includes agreed actions, timeframes, and budgets, and processes for further community consultation.

## 8. Attendance at any Council Hearing

Please clearly tick ONE

- I wish to appear before the Hearings Committee and speak in support of my submission
- I do not wish to appear before the Hearings Committee and speak in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at my hearing

## 9. Signature of Person making submission, or Authorised Agent, and Acknowledgement of Service on Applicant

Signature \_\_\_\_\_ Date: \_\_\_\_\_

*Notes to submitters: A signature is not required if you make your submission by electronic means, e.g. email. You must serve a copy of your submission on the applicant (in this case Whangarei District Council) as soon as is reasonably practicable after you have served your submission on the consent authority (Northland Regional Council).*