

An Open Letter from Kaipara District Council (KDC) to the Mangawhai Community Wastewater Scheme (MCWWS) Advisory Panel

You may recall Council appointed a group of ratepayers from within the Mangawhai community to undertake a review of the MCWWS. Called the Community Advisory Panel, they were to provide independent and objective input into Council's decision-making processes around the possible extension of the MCWWS. Council received the Panel's report in July 2015. The Council and the Advisory Panel both agree that the original objective of the MCWWS scheme - to improve water quality in the estuary, remains valid today and want to continue that initiative so everyone can enjoy the environment that makes Mangawhai what it is.

In response to the Panel's Report and specifically the 22 recommendations given, please find the following Council responses, clustered under theme headings.

1. MAINTAINING GOOD MANGAWHAI HARBOUR WATER QUALITY

Council remains committed to protecting the harbour water quality.

Recommendation 06: That KDC make connection to the MCWWS mandatory for all within the MCWWS drainage district – irrespective of the distance from the marine environment or the size of the section.

Recommendation 09: That KDC pass a bylaw requiring a six monthly Independent Inspection and Maintenance Certificate for all onsite systems, at the property owner's cost.

Recommendation 10: That KDC develop and implement a Connections Policy by 1 July 2016.

Council Response:

Council agrees with all three Recommendations stated above. Council has chosen to lead the Policy initiatives via a Statement of Proposal currently in the public arena for consultation which includes a Warrant of Fitness for onsite systems in the Wastewater Drainage Policy, together with a district wide Wastewater Drainage Bylaw to enforce it. (Recommendation 9) Council has modified the Warrant of Fitness cycle period to three years believing that to be industry best practice.

Council intends continuing the review of the Wastewater Drainage Policy early in 2017, with the new elected members, to address the remaining Recommendations.

Council is also facilitating another project, researching the current harbour water quality with the objective of better understanding and managing the harbour and its tributaries. Northland Regional Council, Community Advisors and Te Uri O Hau are also participating in this project.

Recommendation 13: That prioritisation of extensions to the reticulation lines that permit connection of properties within 300m of the marine environment should occur.

Council Response: 'Ecological extension' (all properties within 300m of the marine environment) option has very high costs versus relative benefits. However, Council will prioritise reticulation extensions to permit connection of properties within 300m of the marine environment and within the existing Drainage District, where feasible. The proposed Wastewater Drainage Bylaw will also apply to properties within 300m of Mangawhai Harbour and in the Drainage District but not connected to the scheme.

2. ENSURING DISPOSAL QUALITY AND CAPACITY IS SUFFICIENT

Council is well positioned to understand the wastewater infrastructure and how to optimise its use.

Recommendation 03: That all grinder pumps are vested in KDC ownership.

Recommendation 04: That all maintenance and repair costs reside with KDC other than for damage caused through misuse.

Council Response: Council agrees. The review of the Wastewater Drainage Policy will continue early in 2017, with the new elected members, to address these Recommendations.

Recommendation 14: That alternative uses for the solid waste materials are investigated to see if a cost effective solution with enhanced environmental outcomes could be achieved.

Council Response: Council agrees, however has yet to identify a cost effective alternative.

Recommendation 16: That KDC undertake a detailed geological assessment of both the Mangawhai Community Park and the golf course, and then update soakage estimates to determine the viability of these long term disposal options. This work to be completed in the next 12 months.

Recommendation 17: That, before progressing investigations for disposal of effluent on the golf course, KDC and the Club agree a terms of reference outlining who would be responsible for factors such as installation, maintenance and operating costs; liability for pollution of groundwater; who would operate the scheme; what would be the order of installation of the irrigation etcetera.

Recommendation 18: That further work on both the soakage capacity and a refined costing for Mangawhai Community Park and the Golf Course is required before further consultation occurs.

Recommendation 20: That, assuming irrigation is a viable option, the order to install over the following 5-20 years is:

- Mangawhai Community Park (surface trickle irrigation)
- Trees and similar off-course areas of the Golf Course (surface trickle irrigation)
- Driving Range of the Golf Course (sub surface irrigation)
- Fairways of the Golf Course (sub surface irrigation).

If irrigation is not viable in conjunction with the farm irrigation, then progress investigations around the Ocean Outfall, acknowledging Iwi objections to new disposal sites.

Council Response: Council has had the farm assessed and found that there is sufficient capacity for disposal for some years to come. This allows greater time to assess other options.

The preliminary assessment indicated that whilst the clean sands of the golf course are likely to provide sufficient infiltration capacity for irrigation, the presence of underlying lower permeable soils indicated the long term sustainability of an effluent irrigation scheme is likely to be limited more by the capacity of the broader groundwater system than by surface infiltration capacity.

Early discussions with the Golf Club identified they had limited funding to contribute to any initiative; this option therefore needs to be costed alongside alternative options. Council will retain the Golf Course as an alternative future option. If this option proceeded, terms of reference would need to be agreed with the Golf Club.

Recommendation 21: That the 65 ha of irrigable land at Lincoln Downs Farm be retained in KDC ownership for the foreseeable future – even if not all of it is needed for irrigation at present.

Council Response: Council agrees. The steeper native bush area on the upper reaches of the farm could be set aside to accommodate recreational facilities.

3. ENSURING THERE IS CAPACITY FOR FUTURE GROWTH IN MANGAWHAI

Council intends managing the investment in infrastructure assets to accommodate future growth.

Council projects that growth will be between 49 and 85 new dwellings per year. Dwelling growth in the catchment area, over the past 12 years, has been averaged at 68 properties per annum.

Recommendation 11: That KDC confirm the industry norm and, if appropriate, complete a hydraulic model of the system to enable better prediction and management of potential bottlenecks.

Council Response: A basic hydraulic model has been done by AECOM; this model is considered appropriate (and affordable) for this size wastewater scheme. The hydraulic modelling defined capacity and identified bottlenecks in the reticulation system. Nine of the existing thirteen pump stations have sufficient capacity to accommodate full development of the drainage district while four will require upgrades. Six new pump stations would ultimately be required to service a fully developed drainage district. The phasing of these upgrades will be dictated by the pattern of development and the growth rates within the respective sub-catchments.

Recommendation 15: That KDC commence the capacity upgrade for the plant in a staged manner that aligns to the expansion of the reticulation network and meets the selected disposal option for the treated effluent.

Council Response: Council agrees and is progressing towards an integrated strategy that: optimises disposal at the Browns Road farm by extending the irrigation area and modifying the disposal resource consent to match the actual land use (i.e. dry-stock grazing); accommodates the Christmas / New Year usage peak; funds the extension of the reticulation network; and upgrades the treatment plant when required in approximately 10 years' time. The reticulation network is being increased on an 'as needs' basis in line with residential development. The financial modelling in progress will provide extension options for the network for inclusion in the Long Term Plan 2018/2028.

Recommendation 19: That primary disposal for the next 5 10 years is through the expansion of irrigation on the existing farm – with a minimum of 5-10 ha of irrigation added to the farm within 5 years, and potentially 20 ha (if required).

Council Response: Council agrees; expansion of the disposal network is budgeted in the Annual Plan 2016/2017 for \$450,000 to increase the trunk infrastructure and install an additional five hectares of irrigation reticulation. The increased trunk infrastructure will facilitate further irrigation extension at a reduced cost. The appropriate matching of the disposal resource consent to the actual farmland usage will enable optimisation of the farm disposal capacity.

4. ENSURING ALL PROPERTIES THAT CAN BE CONNECTED TO THE SCHEME ARE CONNECTED

Council is committed to the principle of connection to a community wastewater scheme and is actively managing exceptions where properties are not connected, yet could or should be connected.

Recommendation 01: That KDC proactively seeks advice from the community of potential non connections. This is particularly relevant should KDC exercise its discretionary powers around mandatory connection.

Council Response: An internal audit was done in 2015 and reported in the Advisory Panel Report. Council also investigates whenever anomalies surface. There are 28 properties that were not connected as part of the original scope of work; Council considers connecting them to be a priority.

Recommendation 02: That KDC review properties where there is the potential that 'rentable units' are not paying full fees as per the current KDC policy.

Council Response: It is very difficult to identify 'rentable units' that are not paying full fees; Council does investigate whenever anomalies surface. Council will consider funding a 2016/2017 summer role to compare accommodation websites and local signage against Council held property records.

Recommendation 05: That KDC actively engage with NRC to ensure better alignment of processes, objectives and physical outcomes by connection to the MCWWS.

Council Response: Northland Regional Council (NRC) understands the issue and has advised KDC to make a submission to the review of the Regional Water and Soil Plan and Regional Coastal Plan for Northland in 2017.

Recommendation 08: That KDC make onsite systems a Restricted Discretionary activity within the District Plan or through a bylaw.

Council Response: Council agrees with the concept, however jurisdiction for a Restricted Discretionary activity in relation to wastewater belongs to Northland Regional Council. Council will make a submission to the NRC Plan 2017.

What Council can do and is proposing to do, is to introduce a Wastewater Drainage Bylaw inclusive of a Warrant of Fitness for onsite systems in the Wastewater Drainage Policy.

5. APPLYING A 'USER PAYS' PRINCIPLE

Council agrees with a 'user pays' principle.

Recommendation 22: That the following guiding principles to charging for the MCWWS should apply:

- Any further capital investment in the scheme should be funded solely by the drainage district ratepayers directly benefiting from the scheme;
- Dwellings in existence before 1 July 2006 within the 2009 reticulated area should be charged a rate reflecting the inflation adjusted cost (excluding subsidies) of those who connected in 2006;
- Communal schemes should be incorporated into the MCWWS as soon as practical (upon extension of the reticulation scheme) and pay the appropriate development contribution at the time.
- All other properties to pay the development contribution applicable at the time once they become connectable.

As a general principle the Panel supports a 'user pays principle'. Therefore any discount offered to one or more properties (or groups of properties) will by default result in higher charges to all ratepayers within the MCWWS catchment.

Council Response: Council agrees with this principle and will formally consider the matter as part of the Long Term Plan 2018/2028. Council currently applies a 'user pays' principle by way of targeted rates and Development Contributions for those properties connected and connectable to the scheme.

6. ENSURING LONG TERM FINANCIAL AFFORDABILITY

Council intends using a staged approach to increasing capacity via staged capital investments.

Recommendation 07: That KDC make completion of the reticulation network to enable full connection a high priority, and that properties within 300m of the marine environment are prioritised for connection.

Recommendation 12: That full reticulation of the MCWWS catchment area is completed within 3 years to enable 100% of properties to fall within the LGA (Local Government Act) connection criteria of 30/60m.

Council Response: Four options are being considered, using both 10 and 40 year horizons:

- 1) Do minimum - extend disposal and reticulation to manage existing commitments, treatment plant capacity 3,000 connections & disposal capacity 2,600 connections;
- 2) Minimal extension of reticulation - option 1 plus provide capacity to service 3,500 connections, treatment plant capacity 3,850 connections & disposal capacity 3,500 connections;
- 3) Pocket reticulation - option 2 plus provide connections to un-reticulated areas within the serviced area, plant capacity 3,850 connections & disposal capacity 3,500 connections;
- 4) Golf course disposal - provide connections to service 4,200 properties within the drainage district, plant capacity 4,550 connections & disposal capacity 4,200 connections.

All appear to be viable and will be further developed in preparation for the 2018-28 Long Term Plan and will be consulted on as part of that process.