



**CENTRAL
HAWKE'S BAY**
DISTRICT COUNCIL

08 July 2021

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Kia ora Jo,

FOLLOW UP TO TAKAPAU CULTURAL IMPACT ASSESSMENT

Thank you for preparing the Cultural Impact Assessment (CIA) for Takapau's proposed refined wastewater discharge. It has been very valuable in providing a tangata whenua view of the existing and proposed regime and guidance for discharge design elements. The resource consent has been lodged and we are in the process of providing details to several questions the Regional Council have via a section 92 response. This includes providing them with a copy of the CIA.

While initially we talked about updating the CIA based on CHBDCs response to your recommendations (and below provides a response to those recommendations), we think it would be good to leave them as recommendations and then acknowledge our responses in a subsequent letter. This could be support or provide alternative thoughts, ideas, suggestions or recommendations. We would then provide the CIA, this letter and your feedback letter to the Regional Council.

To help with the discussions, draft consent conditions which were attached to the consent application are enclosed with this letter. To address some of your recommendations we are suggesting that new or modified conditions are included – these will be based off the information below, and your suggestions or response to this letter.

Response to recommendations

Below are your eight recommendations and our response.

- 1) The proposed change to the discharge system of year-round discharge to land as the preferred option for the receiving environment, is a transformational adjustment from discharging to the awa. It aligns to cultural values and is a significant move forward culturally, environmentally, socially and economically. Council is to be commended for advocating change.***

Thank you for this acknowledgement.

2) *An evaluation at 5 years to ensure that discharge has been totally removed from the wetland and Mākāreū Awa.*

The design of the land-based system has been based on removing as much as possible for irrigation, and if irrigation cannot occur on any one day the discharge is stored until irrigation is possible. To achieve 100 % removal requires a very large storage pond, to the point where significant storm events are captured and water withheld without any over topping. Unfortunately, storm events and 'worse case' weather events are difficult to predict, both in terms of their frequency, how much water will enter the ponds and how long irrigation will have to be suspended. To account for these more extreme events, the discharge that has been proposed includes the ability for some discharge to the (improved) overland flow system, known as the High Rate Land Passage (HRLP).

The technical work undertaken identifies a storage pond of 18,000 m³. This provides for significant storage under most conditions and in fact, due to designing the system for growth, in the first 10 years there may be the scope for 100 % of the water to be retained for irrigation. The attached consent conditions at Condition 13 specifies the storage volume.

At this stage there is no system review proposed. However, a condition could be worded like:

Within five years of the commencement date of this consent, and there after every 5 years, the Consent Holder must prepare a 'System Review Report' including but not limited to summaries of:

- a) the volume applied to land and discharged to the HRLP;
- b) when the HRLP was used and the river flow conditions at the time;
- c) changes that have been made to the wastewater treatment plant and details of changes proposed;
- d) all monitoring undertaken as required by this consent, including Mauri monitoring, and may include additional monitoring undertaken by the Consent Holder; and
- e) storage utilisation and opportunities to better utilise it to avoid the use of the HRLP.

Further, management of the system can be updated, with proposed changes to be made as necessary to the Operation and Management Plan after an annual review by the Consent Holder (see condition 48 of the attached draft conditions).

3) *A review after a 10 year period to evaluate any adverse effects of the BPO.*

As with the recommendation above, there is an annual review of the system proposed (condition 47) and the wider system could be reviewed every 5 years as suggested above. This will result in the any adverse effects being identified and addressed more frequently than the suggested 10 years.

4) *Engagement between Council and Mana whenua, with Mana whenua as participants involved in processes and decision making, is pivotal to moving smoothly through consenting issues and endorses continuation of building an effective partnership into the future.*

Council considers the input of mana whenua as important to decision making in the district and has engaged early with mana whenua including requesting the CIA be prepared. Council also has an ongoing strategy for engagement with tangata whenua across the District, with guidance forming a key part with all consent engagement including with the Takapau discharge consent.

To assist with ongoing engagement, Council have suggested resource consent conditions to provide an opportunity for mana whenua to be involved with cultural monitoring. Conditions 43, 44 and 45 of the attached draft conditions have been suggested. Council would be happy to consider alternative wording.

5) Riparian planting and restoration of other areas is encouraged for maintaining and enhancing water quality and quality of aquatic habitats.

Recommendation is noted.

6) A recommendation for the wetland area to be cleared of vegetation as it has become congested again.

The wetland area is intended to be decommissioned and replaced with an alternative structure. Wetlands require ongoing water, and with the cessation of discharge during dryer low flow conditions there will be no water to sustain plant growth.

Council is planning to clear the wetland of vegetation again, and commits to completing this by December 2021.

Council would like to work with tangata whenua to revise the current discharge area for the longer term, which we are calling the High Rate Land Passage (HRLP).

7) A recommendation for more planting to occur in the wetland of indigenous/native plants particularly Harakeke and other appropriate wetland plants which assist in filtering contaminants.

As noted above, Council are to decommission the wetland area and replace it with a HRLP. Council would like assistance in designing and potentially maintaining this structure.

8) Any discharge activity must include a robust monitoring programme that includes regular monitoring of the discharge and the potential effects on the receiving environment.

As noted above, the suggested resource consent conditions provide for cultural monitoring. They also provide for other monitoring, including the irrigation area and the awa. Council would be happy to discuss modifications to these conditions where you see appropriate.

9) Establishment of a minimum 50m buffer zone between any discharge of contaminants to land activity and the awa, to ensure that surface water quality and groundwater quality are protected.

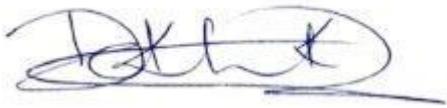
The design to date uses a pivot irrigator to apply the wastewater to land. The consent conditions propose a 20 m set back (Condition 9), however, due to the shape of the land, the majority of the area will have a set back of 50 m and in some cases more. Can you please confirm the layout and buffer distances as proposed are suitable.

We would appreciate if you were able to respond to us and indicate whether you are supportive of the responses to the recommendations. Of particular interest is your comments and support for the conditions referred to in our response above.

As mentioned at the start of this letter, we would like to provide this letter and your response with the CIA to the Regional Council.

We are planned to respond to HBRC by the end of July 2021.

Ngā mihi nui,



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cc: Hamish Lowe – Lowe Environmental Impact

Annex A: Draft consent conditions (included with consent application and dated 26 April 2021)