

24 December 2019

Doug Owens
E-mail: doug@owensifs.com

Dear Mr Owens

REQ.597551: OFFICIAL INFORMATION REQUEST – RUSSELL WHARF ACTIVITIES & RUSSELL GROUNDWATER

Further to my e-mail dated 12 December 2019, the Northland Regional Council's responses to the remaining information requests and questions contained in your e-mail dated 30 November 2019 are as follows:

Groundwater Information

The Northland Regional Council ("the council") has implemented most of the recommendations of the Russell Hydrogeological Update Report (June 2001). A key outcome of the groundwater modelling work commissioned by the council in 2002 in response to the Update Report (as reported in the Russell Groundwater Modelling Report (2002) was:

"... a numerical groundwater flow model (MODFLOW) was developed to enable dynamic sustainable yield and the effects of wastewater reticulation to be assessed. Reticulation of the sewage system for Russell township began in 1998 with completion expected by 2006. The specific objectives of the study included:

- *Assessment of the effects of reduced recharge due to wastewater reticulation;*
- *Refinement of the sustainable aquifer yield specified in SKM (2001) and assessment of future sustainable yield based on proposed wastewater infrastructure development; and*
- *Development of appropriate aquifer management procedures."*

As noted in our letter dated 14 October 2019, the council will be undertaking additional groundwater data review and modelling within the next 12 months to determine groundwater quality and level triggers for the aquifer. This modelling will also reassess sustainable allocation limits for the aquifer.

The majority of historic groundwater use records for the Russell area are in hardcopy form, which is why it will take 45 hours of staff time to provide all water use and historic groundwater monitoring data for Russell from 2001-2019. The council still requires a payment of \$3,510 before proceeding to collate and provide that information. As an alternative, you can make an appointment at our Whangarei office to view the hardcopy files that contain this information.

FNHL Dredging Consent Application

I confirm that a resource consent application for dredging at and around the Russell Wharf was made by the Far North District Council on 17 July 2019 (reference number APP.005667.12.01).

Copies of the relevant documentation requested, including the Section 95 (RMA) Notification Decision Report and Section 113 (RMA) Report and Decision for the application, are able to be accessed via the following Link: https://northlandregionalcouncil-my.sharepoint.com/:f:/g/personal/paulm_nrc_govt_nz/EvIqk6lbGWWhNhhzR5FofwtgBft_aaEap8m-cFAAXgUGG2g?e=W12k2Y

The application was processed non-notified and a decision on the application was made by the council on 21 August 2019. A copy of the resource consent is available via the link above.

Far North Holdings Limited ("FNHL") has confirmed that the pontoon on the Russell Wharf identified as "P1" is the dedicated public berth for the facility. FNHL has advised the council that while pontoon P1 is the dedicated public berth, all of the other non-commercial berths on the facility are also able to be accessed and used by the public.

Russell Wharf Sewage

The council stands by its view that Resource Consent AUT.008339.01.03 does not restrict the areas served by the Russell Sewage Scheme. In particular, the consent authorises the discharge of *"treated wastewater, including Russell Landfill leachate to ground via disposal boreholes"* from the *"Russell Sewage Treatment Plant"* and does not mention or identify the "Area of Benefit" for the treatment plant.

As previously advised, the current volumes of wastewater discharged from the treatment plant are well below the design volume/capacity of the treatment plant and, therefore, can easily accommodate the proposed wastewater/sewage from the wharf facilities. The wastewater from the toilet facilities may result in little or no increase to wastewater inflow to the treatment plant as it is reasonable to assume that people using the wharf toilet facilities will not need to use onshore toilet facilities. Should the wastewater inflows into the treatment plant approach its design capacity during the term of the current consent (30 April 2024), then the Far North District Council would need to consider upgrade requirements for the treatment plant and obtain either a change of conditions to the consent or, more likely, a new (replacement) consent for the discharge.

Sewage Discharges from Visiting Vessels

The council does not accept your assertions regarding sewage discharges from visiting vessels.

Potable Water Supply

The council stands by its view that the water supply to the wharf could be accommodated by existing consents for water takes in the Russell area.

Any arrangement that the holder of the consents for Russell Wharf enters into with any existing groundwater take consent holder to provide water would be a civil matter between those parties, which the council would not get involved in. The council's role would be to monitor and enforce the conditions of the consent being relied on.

District Plan and Building Act 2004 requirements for a water tank on the wharf are matters that fall under the jurisdiction of the Far North District Council, which the Northland Regional Council would not get involved in.

The council understands that a 3,000 L water tank is proposed for the new facility, as shown on Plan Number 4761/2B attached to the consents for the wharf and the previous version of that plan – Plan Number 4761/2A. If a 6,000 L water tank is to be installed on the wharf, then that would require a variation to the consents to replace Plan Number 4761/2B with a new (updated) plan. FNHL has been advised of this.

Yours faithfully



Colin Dall
Group Manager – Regulatory Services