

21 November 2024

Independent Hearing Panel
C/o
West Coast Regional Council
Via email: chu.zhao@wrc.govt.nz

Our reference: 510783

Attention: Chu Zhao

Dear Sir

Review of West Coast Regional Council Cumulative Effects of Onsite Wastewater Disposal Report: On behalf of Tauranga Bay Holdings Ltd: Submitter #597 and FS #32

On behalf of Tauranga Bay Holdings Ltd, in regard to their rezoning submission for their property at Cape Foulwind, I have reviewed the Cumulative Effects of Onsite Wastewater Disposal report prepared by BTW Company for the West Coast Regional Council, dated 8 October 2024.

It is my professional opinion that:

The BTW report does not contradict our client's request for onsite effluent disposal for the rezoning and, more specifically, does not preclude the possibility to have 4,000 m² parcels in selected areas of the development, namely Areas A2 and B2 in regard to cumulative onsite wastewater effects.

- The report has used a very conservative approach in regard to the data used for their calculations. I note that estimated water usage (litres of water per person per day) was kept on the conservative side by assuming that the new buildings/dwellings to be erected on the individual parcels would not be equipped with the now-standard minimum water fixtures. The conservatism regarding assumed water usage describes a far more problematic scenario than the most likely one. The report is also using very conservative data in terms of potential attenuation of the soil and does not really account for the natural attenuation capacities of water streams and, more importantly, wetlands.
- Estimated secondary systems efficiency is kept on the conservative side as well, using effluent expected quality relatively average for secondary treatment systems. The review of commonly used systems having undergone OSET testing provides better insight of the most likely treated effluent quality to be discharge onto/into the ground.
- We note that the report acknowledges some important information regarding catchments/wetlands delineation, flows and groundwater is unavailable (Section 3.4 – Data Gaps). The lack of available data tends to orient the assessment of cumulative effects towards a more conservative assessment.

We understand that:

- The report correctly recommends the use of secondary treatment systems as a minimum level of wastewater treatment.
- In the future, each individual parcel will have to have specific wastewater reports prepared, addressing the level of treatment and the type of soil disposal at the time of building consent. The proposed systems will have to address the Nitrogen and pathogen levels with appropriate emphasis according to the environmental conditions specific to the parcels along with other regulatory parameters (i.e for discharge of effluent to land).
- The BTW report does not conclude or identify that there are any restrictions regarding the proposed zone (and parcel size) for areas A2 and B2 identified within the submission site.
- We note that part of the submission site (the southern most parcel across Wilsons Lead Road) and proposed to be rezoned Settlement Zone Precinct – 4 Rural Residential Precinct, was not addressed by the BTW report. However, based on the information and the data used in the report, it is our professional opinion that that part of the submission site is highly likely to have very similar site conditions and features as proposed B2 area. As such, the same conclusion could reasonably be drawn for the omitted area as per B2, i.e. that there are no concerning cumulative effects related to onsite wastewater discharged from 4,000 m² parcels in that area.

Based on the above we can reasonably conclude that, despite the conservatism used throughout the report calculations, the picture it draws mostly represents the “worst case scenario” in regard to potential for cumulative onsite wastewater effects. I consider this is appropriate and given no restrictive conclusions are drawn in respect of areas A2 and B2 for the submission site, I consider that the report confirms that the site rezoning as proposed continues to be appropriate.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dumont', with a stylized flourish above it.

Philippe Dumont
Environmental Scientist
BAgSc(Hons) MSc CEnvP SQEP
philippe.dumont@eliotstinclair.co.nz