

Cultural Impact Assessment

Te Whānau Moana and Te Rorohuri

Haititaimarangai Marae

Far North District Council Proposal for Wastewater
Treatment Plant and Discharge

June 2025

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Te kuaka he kuaka marangaranga. Tahi manu i tae ki te tāhuna tau atu tau mai

The kuaka is a rising bird. When one lands on the beach others follow.

A. INTRODUCTION

This Cultural Impact Assessment (**CIA**) was developed for the purpose of providing Far North District Council (**Council**) with the perspective of tangata whenua, on the cultural impacts of its proposal to obtain a new consent for wastewater treatment and discharge.

Information contained in this document must not be used for anything other than the express purpose.

B. EXPLANATORY NOTES

This CIA is a result of a collaborative effort. Ngāti Kahu Station Ahuwhenua Trust led the drafting of the CIA, with input from tangata whenua, the Haititaimarangai Marae Ahuwhenua Trust, Haititaimarangai Marae 339 Trust.

Reference to tangata whenua in this CIA means those of Te Whānau Moana and Te Rorohuri uri, who whakapapa to Haititaimarangai Marae, being the only Marae within their rohe that was established in accord with tikanga.

This CIA contains several explanations concerning Te Whānau Moana and Te Rorohuri principles, values, mātauranga and kawa. There are limitations to explaining the worldview of one culture in another's dialect, particularly when interpreted in the context of different norms and ideologies.

1. OVERVIEW

- 1.1 Te Whānau Moana and Te Rorohuri are the two hapū o Haititaimarangai Marae. Haititaimarangai Marae is the tupuna Marae of Ngāti Kahu.
- 1.2 Haititaimarangai is named after the mokopuna (grandchild) of the founding tūpuna (ancestors) of Ngāti Kahu, being Kahutianui and Te Parata.
- 1.3 Te Whānau Moana and Te Rorohuri rohe encompasses Karikari Peninsula and the surrounding waters. They are tangata whenua, mana whenua, tangata moana and indeed mana moana here:

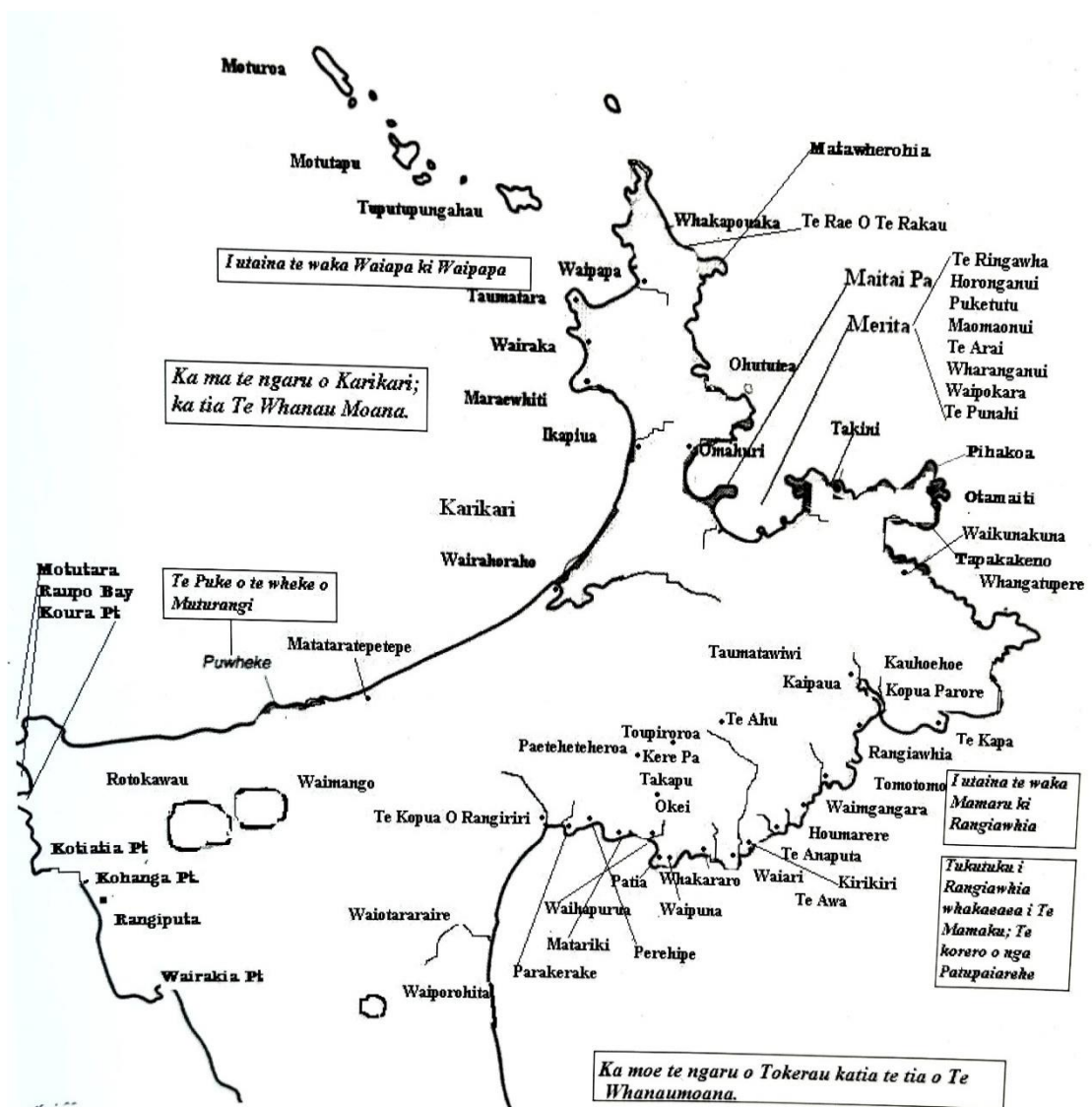


Fig 1.¹

¹ A Johns Ngā Tapuwae o Hinetewai (2012) p. 1.



Fig 2²

- 1.4 Far North District Council (**Council**) propose to apply for a new resource consent to operate a wastewater treatment plant and to discharge treated wastewater to Wairahoraho Awa and / or Waimango (**Proposal**).
- 1.5 The Proposal is located off Inland Road, within Karikari Peninsula. This is within the rohe of Te Whānau Moana and Te Rorohuri.

² CIV-2017-458-000271, Te Whānau Moana me Te Rorohuri Marine and Coastal Area Application, noting the boundaries are indicative, the claim for customary marine title extends 12 nautical miles seaward.

2. CIA SCOPE

- 2.1 This CIA assesses impacts of the Proposal, in the context of the longstanding associations, experience and maatauranga that Te Whānau Moana and Te Rorohuri have with the areas affected by the Proposal.
- 2.2 Council advised that the proposed receiving environment for treated wastewater is made up of Wairahoraho Awa, Waimango and Karikari Moana.
- 2.3 Constraints to the scope of this CIA include that at the time of writing this assessment:
- a. limited material has been made available to Te Whānau Moana and Te Rorohuri;
 - b. resourcing is scarce. As unsettled hapū, Te Whānau Moana and Te Rorohuri rely on volunteer time and expertise. Resourcing for this CIA was confirmed on 13 May 2025.
- 2.4 This assessment is not consultation. It collates information to facilitate understanding for further discussion.

3. METHODOLOGY

- 3.1 Information relied on in producing this CIA includes:
- a. Ngā Tapuwae o Hinetewai, being a book authored by Atihana Johns, a Te Whānau Moana and Te Rorohuri kaumātua;
 - b. evidence produced by hapū members in different proceedings;
 - c. korero tuku iho;
 - d. the Haititaimarangai Marae Hapū Management Plan;
 - e. information provided by Council, including the:
 - i. Proposal overview and the existing consent conditions, which are contained in attachment 'A';
 - ii. information communicated in an online hui, as recorded in the minutes contained in attachment 'B';

- iii. a site visit, during which Council advised it had not monitored or assessed some parts of Waimango;
 - iv. odour, flood hazard (complete copy) and water quality assessments (extract only a complete copy can be provided on request) which are contained in attachment 'C';
 - v. list of five wastewater plants and engineers' advice on those plants, noting the above qualification (financial feasibility of each is uncertain) and information from the related hui, including that Council confirmed sludge has not been removed over the life of the existing consent.
- 3.2 No assessment of the effects on ecology and landscape (inclusive of the cultural dimension) have been provided as at the date of writing this CIA.

4. ARRIVAL

- 4.1 Muturangi gifted a mōkai (pet) wheke (octopus) to Kupe to guide his travels from Hawaiki to Aotearoa. Kupe arrived at Rangiawhia and then travelled around what was then an island, to Puheke. Unfortunately, the wheke birthed babies on their travels, which ate the bait of Kupe's fishermen, so Kupe killed it.
- 4.2 The wheke now sits as the maunga that features in the pepeha of Te Whānau Moana and Te Rorohuri. The full name of the maunga is "Te Puke o Te Wheke o Muturangi". The shortened version is "Puheke", according to their traditions and pronunciation. Puheke overlooks Karikari Moana, Waimango and Wairahoraho Awa.
- 4.3 Kahutianui was the daughter of Kahukura and Tūmoana; the rangatira of the Tinana waka. The Tinana waka had arrived earlier near Ahipara. Ngāti Kahu iwi is named after Kahutianui. Te Whānau Moana and Te Rorohuri affiliate with this iwi.
- 4.4 On returning to Hawaiki, Tūmoana left his daughter and son in Aotearoa. He then passed Tinana waka onto his nephew Te Parata, who refashioned it, renamed it Māmaru and voyaged to Karikari Peninsula. On arrival, Te Parata married Kahutianui.

- 4.5 Ruakareamea and Waipapa waka arrived after Māmaru. These were internal migrations rather than new arrivals from Hawaiki. The people who stayed from these waka married into Te Whānau Moana and Te Rorohuri.
- 4.6 Te Whānau Moana and Te Rorohuri are coastal hapū, with a coastal Marae. They have lived by the sea, fed from the sea, and shaped their tikanga around the sea since their arrival.

5. TE TAIAO

- 5.1 For Te Whānau Moana and Te Rorohuri, there is no definitive line between the spiritual and physical worlds, or the natural environment and them as a people.
- 5.2 Each element of the natural world is connected through whakapapa, being originally birthed by Papatūānuku and fathered by Ranginui. Thus, the natural world is an interconnected web of life with each element having its own mauri (life force).
- 5.3 The inextricable connection between the Te Taiao and Te Whānau Moana and Te Rorohuri informs and underscores their tikanga, practices, beliefs, and very identity. This intimate connection is perhaps most readily exemplified in the translation of their names:
- a. Te Whānau Moana literally translates to “the sea family”;
 - b. Te Rorohuri translates to “the head turned”. One of the kōrero connected to this name is that Parinuitonu, a tupuna was guided to wheua (whale bone) by a mako (shark). He retrieved the bone and took it to Kaiwhare, a Ngāti Whātua tohunga to carve. When Parinuitonu arrived to collect the bone, very little had been carved. The tohunga advised that the head kept turning as if it were alive and it wouldn’t allow the puku (stomach) to be carved.
- 5.4 Further examples of the close connection between Te Whānau Moana, Te Rorohuri and the Moana are highlighted in that their pepehā features the names of two Moana, Karikari and Tokerau. In addition, their Maunga is named after a creature of the sea; the wheke.
- 5.5 Whenua, wai (water), puna (underground freshwater springs) and kūkūwai (wetlands) are also indivisible from Te Whānau Moana and Te Rorohuri. The

sands, waterbodies and taonga species mark those things that make the rohe Te Whānau Moana and Te Rorohuri.

- 5.6 In practical terms, Te Whānau Moana and Te Rorohuri traditionally lived by and were sustained by the shellfish and fish of Tangaroa and wai Māori (freshwater) birds of Tane, and the fruits and vegetables of Papatūānuku. Protection was achieved through these practices. Areas that were utilised and harvested were allowed time to replenish. This approach facilitated balance, ensured future generations could be provided for and upheld whanaungatanga obligations to Papatūānuku, her children and the taonga within.
- 5.7 Balance has been lost over time. Within the Te Whānau Moana and Te Rorohuri rohe, freshwater has become dirty, with lower flows and less life within, development of land has seen the removal of native plants and reduction in kainga (homes) for taonga species. Mahinga kai sites have depleted or become unusable due to paru (unclean) activities being undertaken.
- 5.8 Much of the harm to the rohe of Te Whānau Moana and Te Rorohuri has been caused by things that are out of their control. People come and go from their rohe. They are left to bare the whakamā (shame) of the harm caused. The inseparable relationship between Te Whānau Moana and Te Rorohuri and their environs, means the harm to their rohe has a corresponding effect on them.

6. TIKANGA

- 6.1 “Tikanga” literally translates to “the rights”. It refers to the right way of doing things. Tikanga is informed by the kōrero of tūpuna (ancestors) and manifests in practice.
- 6.2 For Te Whānau Moana and Te Rorohuri, tikanga transcends the physical and spiritual realms and influences everything from political organisation of pan-hapū / iwi interactions to social and environmental practices.
- 6.3 There are dynamic and standing principles of tikanga. For example, tikanga generally allows for malleable management in terms of development. Where a part of the rohe is healthy, it may be able to absorb some development. When it is unwell, protection and restoration is required. Standing principles include things such as not mixing paru or profane with kai or that which is sacred.
- 6.4 Tikanga principles that are especially relevant to the Proposal include:

- a. **rangatiratanga** (autonomy): the ability to exercise self-determination and govern affairs within tribal boundaries in a manner that promotes well-being and aligns with tikanga;
- b. **mana** (authority): in essence, mana represents the respect, dignity and authority that derives from being a part of a particular hapū;
- c. **whanaungatanga** (relationships): building and maintaining relationships with whānau, hapū, iwi, manuhiri (guests) and non-human entities within the rohe;
- d. **manaakitanga** (caring): showing respect, kindness and support for others, inclusive of each element within the natural environment;
- e. **kaitiakitanga** (stewardship): managing or caring for the natural environment in a way that protects their integrity and preserves them for future generations;
- f. **utu** (reciprocity): properly implemented, utu achieves an equilibrium by through balancing exchanges between individuals, groups, and all other life.

6.5 Te Whānau Moana and Te Rorohuri values and tikanga connect and overlap. Tikanga reflects the values like, among other things, respect, reciprocity, relationships, authority and caring for one another (inclusive of human and non-human entities). Tikanga provides a framework that embodies values and facilitates practical expression and application of those values.

6.6 In this context, the term “values” is used to express the cumulation of beliefs, customs and principles that are fundamental to the world view of Te Whānau Moana and Te Rorohuri.

6.7 It is not possible to comprehensively express Te Whānau Moana and Te Rorohuri tikanga and values in this assessment. With that in mind, they provide a more detailed overview of their tikanga principles and values that are particularly important to assessing the proposal below.

7. KAITIAKITANGA

7.1 Contemporary use of the word kaitiakitanga is a relatively new for Te Whānau Moana and Te Rorohuri. That said, they consider it to adequately characterise their obligation to protect Te Taiao. It also applies in the broader sense of

safeguarding relationships with whanaunga (relations), act as guardians and protect tikanga, autonomy, social and economic needs, for present and future generations.

- 7.2 Traditionally, Te Whānau Moana and Te Rorohuri kaumātua and kuia were responsible for caring for the land, freshwater bodies, springs and species within the rohe. They were repositories of knowledge that maintained and taught tikanga. Put another way, they were kaitiaki of Te Whānau Moana and Te Rorohuri mātauranga (knowledge).
- 7.3 For Te Whānau Moana and Te Rorohuri, taniwha can take the form of pākaurua (stingray), mango (shark) and wheke. Taniwha were and are responsible for looking after the moana and they were known as kaitohu.
- 7.4 Although there are different kaitiaki for the domains of Papatūānuku and Tangaroa, all things are connected. As a coastal hapū, Te Whānau Moana and Te Rorohuri are obliged to ensure land-based activities do not compromise the health of taniwha or Tangaroa.
- 7.5 Te Whānau Moana and Te Rorohuri consider it challenging to fulfil their kaitiaki duties. As above, greater use of their rohe has seen degradation of their waters and land, as well as declining populations of shellfish, fish and wildlife. Much of this harm has been caused without consideration of their knowledge, experience, relationships or values. This displaces proper operation of kaitiakitanga and practical expression of tino rangatiratanga.

8. MANA

- 8.1 Mana translates to authority or prestige. Mana has significant implications for relationships with Te Taiao. It is not only a measure of social and spiritual status, but also an expression of the intricate and dynamic balance between humans and non-humans.
- 8.2 Each entity has its own mana, human and non-human. Mana fluctuates. It can rise or fall depending on factors like peoples (or entities) actions, behaviours, relationships and the broader social context.
- 8.3 Mana operates as a part of an interconnected web of tikanga principles. Examples of the fluctuation of mana in connection to other principles include:

- a. **kaitiakitanga**: successfully managing and protecting water, land and the species within enhances the mana of those who are responsible. In contrast, degradation or neglecting responsibilities can erode mana;
- b. **whanaungatanga**: the way traditions and responsibilities are upheld and honoured can influence how mana is perceived. Fulfilling responsibilities and upholding traditions typically enhance mana. Acts to the contrary can lead to a decrease;
- c. **manaakitanga**: caring for one another, manuhiri (visitors), land, water and the species usually lifts mana. Providing locally sourced kai is a simple but important component of caring for those who visit. Failure to care for others generally depletes mana.

8.4 Whakapapa underscores the right to exercise mana and the extent to which that mana may be exercised. For Te Whānau Moana and Te Rorohuri, it is not appropriate to assert mana over the rohe of other hapū. Similarly, it is not appropriate for an individual to assert she or he has the mana to speak for Te Whānau Moana and Te Rorohuri without first obtaining support from the hapū.

9. WHAKAPAPA

- 9.1 Whakapapa refers to lineage and is fundamental to Te Whānau Moana and Te Rorohuri. Whakapapa is woven into the social, spiritual and ecological fabric of their worldview. It shapes identity and guides actions.
- 9.2 Whakapapa holds pan-dimensional significance, connecting tangata whenua not only to other humans but also to atua. This reinforces the understanding that all elements of the world are part of one interconnected whānau, and affirms the enduring responsibilities of tangata whenua to uphold their reciprocal relationship with Papatūānuku.
- 9.3 Whakapapa is crucial for defining customs, tribal boundaries, identity, beliefs and heritage. Broadly, rights include the ability to use places and species within their rohe. Responsibilities include the duty of care for and protect places and species within their rohe.
- 9.4 Ancestry is not enough on its own. The home fires must be kept alight through occupation, use and / or frequent connection. Where people move away, marry into other families and do not return for decades or otherwise fulfil tangata whenua duties, fires generally go out.

- 9.5 Understanding and honouring whakapapa is essential to maintaining cultural integrity, fostering resilience and ensuring the survival of culture and traditions for future generations.

10. MAURI

- 10.1 Te Taiao is a living entity imbued with mauri (life force or vitality), rather than a backdrop or resource.

- 10.2 Every entity has its own mauri. Maintaining the balance of these life forces is essential to maintaining the well-being of Te Whānau Moana and Te Rorohuri and discharging obligations in accord with tikanga.

- 10.3 Mauri is at its strongest when it is free of human influence. Indicators of strong mauri include:

- a. paru is removed from mahinga kai sites and areas of cultural significance;
- b. native plant and animal species are abundant and thriving;
- c. the sound of strong water flows, tides and wildlife;
- d. food webs are flourishing and balanced;
- e. waterbodies are clean with clear water and healthy flows;
- f. the smell of land and water is not tainted with unnatural odour;
- g. traditions, customs and practices are known, applied and respected;
- h. land and waterbodies are free from pollution;
- i. invasive species are absent.

- 10.4 Conversely, indicators that mauri is weak include markers like:

- a. paru is discharged, placed or allowed to enter mahinga kai sites, areas of cultural significance, areas that are wāhi tapu;
- b. native plant and animal species populations are declining;
- c. silence where the sounds of water and wildlife once thrived;
- d. food webs are compromised or exhausted;

- e. waterbodies are paru, with unclear water and reduced water levels and algae;
 - f. pungent or unnatural smells emit from land or water;
 - g. traditions, customs and practices are suppressed or unable to operate;
 - h. pollution is present;
 - i. pests are present.
- 10.5 Where the mauri of an area or place has diminished, Te Whānau Moana and Te Rorohuri tikanga requires the area or place to be protected and the mauri reinstated. The more unwell an area is, the greater the protection must be.
- 10.6 As tangata whenua and tangata moana of Karikari Peninsula, Te Whānau Moana and Te Rorohuri are responsible for maintaining, nurturing and where necessary, replenishing the mauri of each entity within their rohe.

11. PROPOSAL OVERVIEW

- 11.1 Council currently operates a wastewater treatment plant (**WWTP**), which is situated on the eastern side of Inland Road, Karikari Peninsula.
- 11.2 Resource consents for the WWTP expire on 30 November 2025.
- 11.3 Council advised it will apply for new resource consents for the Proposal in May 2025.
- 11.4 During a meeting and site visit with some hapū members, Council indicated:
- a. the WWTP would discharge to Wairahoraho stream and Waimango wetland;
 - b. it has not evaluated any other options for plant location or disposal methods;
 - c. it was open to having a committee of people, including tangata whenua involved in the WWTP operation via conditions;
 - d. it wanted a CIA that focused on the cultural effects of the Proposal.

12. LOCATION – PĀRAKERAKE

- 12.1 The Proposal is located on whenua that Te Whānau Moana and Te Rorohuri known as Pārakerake.
- 12.2 Pārakerake was a papakainga and fisheries village over the life of a Te Whānau Moana and Te Rorohuri rangatira, Ranginui.
- 12.3 Pārakerake was surveyed in around 1872 and sold shortly after. Te Whānau Moana and Te Rorohuri did not agree to the sale of Pārakerake. It was sold by two vendors who did not represent their hapū. In one case, the vendor did not even whakapapa to the hapū.
- 12.4 The sale of Pārakerake divested Te Whānau Moana of their land, the waters within and opportunities to develop within the new economy.
- 12.5 Pārakerake is connected to the wider rohe and significant in spiritual terms. At the end of Tokerau beach a stream flows to the sea in a place that shares the name Pārakerake. There is a whirlpool known as Te Kopua a Rangiriri (the deep pool of Rangiriri). Rangiriri is a taniwha that originated from Whatuwhiwhi. A piece of wood swirls back and forward within Te Kopua a Rangiriri. This wood is tapu (sacred) and never leaves the area.

13. WAIRAHORAHU, WAIMANGO AND KARIKARI ASSOCIATIONS

- 13.1 Te Whānau Moana and Te Rorohuri consider water to be a taonga of great significance, that is essential for the health and wellbeing of both humans and non-human entities.
- 13.2 Waterbodies have their own mana and mauri. They are to be respected and protected. The mauri of a waterbody can be seen as a measure of its physical and spiritual health and life-giving capacity, in line with the indicators set out above.
- 13.3 Inappropriate discharges, other pollutants, modification, activities within the catchment, poor management and pest species can severely degrade waterbodies. Broadly, there are three indicators to the state of water health:
 - a. wai ora, being water that is pure, healthy or well;
 - b. wai Māori, being the mauri of the freshwater system;
 - c. wai mate, being water that is unwell or dead.

- 13.4 As tangata whenua, Te Whānau Moana and Te Rorohuri must ensure that the waterbodies within their rohe are protected and healthy, meaning their mauri is strong, they are healthy and thus, their mana is protected.
- 13.5 Wairahoraho, Waimango and Karikari Moana are closely connected. Wairahoraho flows to Waimango. Waimango and Karikari Moana feed one another.
- 13.6 The Northland Regional Council Policy Statement map provides a good example of the interconnection and significance of these bodies. It identifies Karikari beach as being an outstanding natural landscape and of outstanding natural character. Waimango is identified as being of high natural character. The mouth of Wairahoraho Awa, Waimango and Karikari beach are identified as being an outstanding natural landscape.

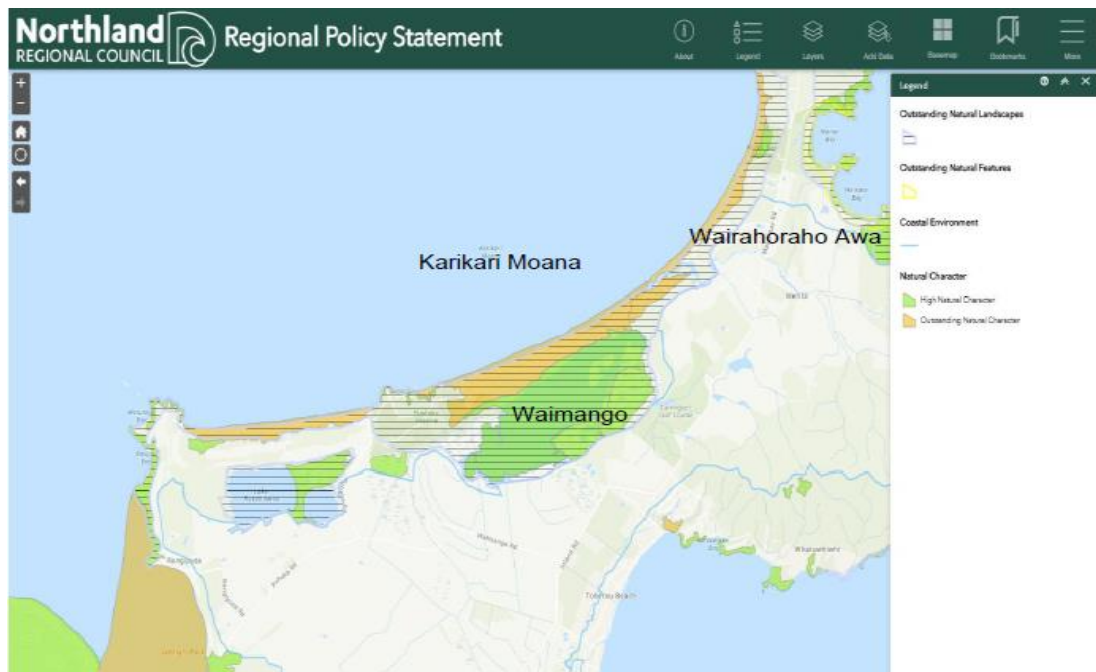


Fig. 3

- 13.7 Te Whānau Moana and Te Rorohuri understand that cultural values and associations count towards the values and character of an area. They say it is unfortunate that the Policy Statement does not factor cultural matters into the attributes that make this area so unique and special. Particularly given that Te Whānau Moana and Te Rorohuri presented evidence to this effect during the latest plan change.

Karikari Moana

- 13.8 Karikari Moana is an inextricable part of Te Whānau Moana and Te Rorohuri identity and thus of extremely high cultural significance. Karikari Moana is one of the two Moana that feature in their pepehā.
- 13.9 Burials within the sand were one of the ways that Te Whānau Moana and Te Rorohuri traditionally buried tūpapakū. Kōiwi (human bones) remain in the sands of Karikari to this day, deeming the coastal areas of Te Whānau Moana me Te Rorohuri with sand dunes, as wāhi tapu and areas of cultural significance.
- 13.10 Among other things, Pingao grow in the sands of Karikari. Te Whānau Moana and Te Rorohuri kōrero is Pingao was originally a sea child. She wanted to live with Kākaho (toetoe grass) who grew further inland. Pingao asked her parent; Tangaroa if she could go and live with Kākaho. Initially, Tangaroa refused. After some discussion, Tangaroa agreed to spray Pingao with seawater so she could crawl up to Kākaho. Unfortunately, Pingao did not make it, which is why she now lays in between the sand and the sea.
- 13.11 Traditionally, Pingao was harvested and used for weaving. This tradition has largely been lost with the reduction in Pingao abundance.
- 13.12 Karikari Moana was a mahinga kai site, with shellfish like toheroa, oysters, pupu, tuatua, scallop and kina, and fish like kanae; mullet and pātiki; flounder. Te Whānau Moana and Te Rorohuri have restricted the taking of kai from this area due to the pollution and wastewater flowing across them.

Wairahoraho Awa

- 13.13 Wairahoraho used to provide a place for Te Whānau Moana and Te Rorohuri to gather, swim and play in. That no longer occurs as the amount of water that flows through Wairahoraho Awa has reduced and become paru over the years.
- 13.14 Te Whānau Moana and Te Rorohuri used to net fish like tuna; eel at the mouth of Wairahoraho. This practice has stopped, due to the pollution and wastewater exposure.
- 13.15 The banks of Wairahoraho Awa provided homes and feeding grounds for manu (birds) like tōrea pango (variable oyster catcher), pīhoihoi (NZ pipit), tara (white-fronted tern), ngutu parore (wrybill), tūturiwhatu (red breasted dotterel), kohutapu (sharp-tailed sandpiper), taranui (Caspian tern) and kuaka (godwit).

- 13.16 Some of these manu remain in Wairahoraho Awa, though Te Whānau Moana and Te Rorohuri have noticed less birds come to Wairahoraho. They understand that some are vulnerable to extinction.

Waimango

- 13.17 Waimango is also of extremely high significance. “Wai” translates to “water” and “mango” translates to “shark”. This name was given because there used to be a greater connection between Karikari Moana and Waimango. At that time, mango would swim in and spawn in the area. Waimango was the nursery for taniwha that took the form of mango.
- 13.18 Waimango traditionally provided sustenance for Te Whānau Moana and Te Rorohuri. Whānau trapped tuna (eels) using hinaki (eel traps). Karikari Moana would wash kanae (mullet) into Waimango at high tide. When the tide ebbed, it left pools of kanae which whānau would collect and eat.
- 13.19 Waimango and the surrounding whenua provided kainga (homes) for manu like parera (ducks), karakahia (grey duck), kuaka (godwit), matuku (bittern), tūturiwhatu (banded dotterel), pūweto (spotless crane), taranui (Caspian tern), mātātā (fernbird) and tara (white fronted tern).
- 13.20 Te Whānau Moana and Te Rorohuri have seen the number of manu around Waimango decrease. They understand that some of these manu are heading towards extinction.
- 13.21 Lands and Survey modified Waimango. It cut through the sandhills near Matataratepetepe. The size and depth of Waimango was reduced, along with the sand dunes. The outlet that once joined Wairahoraho Awa and flowed out towards Maraewhiti changed. These alterations were made for the Crown on the whenua known as Rangiputa. They were made at the expense of Waimango and the life within.
- 13.22 Waimango has also suffered from activities within the catchment. Wastewater discharges, farming, development and other activities have harmed and continue to harm Waimango. This harm extends to Karikari Moana by flow.
- 13.23 Few species live within Waimango these days. On engaging with a developer a few years ago, Te Whānau Moana and Te Rorohuri learnt the scientific term for Waimango is ‘hypereutrophic’. In Te Whānau Moana and Te Rorohuri terms, that means Waimango is paru, unwell and struggling to support life – her mauri is

heavily depleted. They also understand that if pollution continues, the harm might transition Waimango to a eutrophic state, meaning it will be difficult if not impossible to reinstate her integrity. The waters of Waimango that once cradled their taniwha will become wai mate.

13.24 Te Whānau Moana and Te Rorohuri do not collect kai from Waimango anymore. It is not appropriate given the level of pollution and that wastewater is discharged to the area.

13.25 Efforts have been made to try to restore Waimango. For example, in around 1999, Paul Kelly obtained resource consents to develop a resort on whenua that Te Whānau Moana and Te Rorohuri know as Pārakerake. Waimango is partly situated on this whenua. They engaged with Paul Kelly, and he agreed to restore Waimango to its original state. Unfortunately, he sold the resort after lengthy litigation with the Rūnanga and that agreement was lost. Restoration is difficult without control or access.

14. CULTURAL EFFECTS OF PROPOSAL

General

14.1 Discharging wastewater to Wairahoraho, Waimango and ultimately Karikari Moana will have a seriously negative impact on Te Whānau Moana and Te Rorohuri, for the reasons outlined below.

14.2 Te Whānau Moana and Te Rorohuri view wastewater paru or profane, irrespective of whether or not it has been treated. Areas that receive wastewater discharge are considered contaminated. This depletes mauri and erodes mana.

14.3 The location of the Proposal is particularly offensive to Te Whānau Moana and Te Rorohuri as it involves discharging treated wastewater to:

- a. the traditional birthplace and cradle of their taniwha, embodied as mango. In that sense, the Waimango is wai tapu (sacred water). Whilst taniwha no longer breed in Waimango, Te Whānau Moana and Te Rorohuri are obliged to reinstate the integrity of Waimango so it supports this life again. The Proposal is an affront to this goal;
- b. a Moana that features in the pepehā of Te Whānau Moana and Te Rorohuri. Releasing wastewater to a place that is significant to Te Whānau Moana and Te Rorohuri is a proposal to takahi (trample) their very identity;

- c. an area where koiwi lay. Allowing wastewater to wash over areas that contain koiwi is a violation of Te Whānau Moana and Te Rorohuri tikanga.
- 14.4 Te Whānau Moana and Te Rorohuri were denied the opportunity to effectively express rangatiranga and care for and uphold their relationship with Pārakerake and the taonga within following its sale. The Proposal will further compound suppression of their culture and traditions.
- 14.5 Discharging wastewater as proposed amounts to desecration of the tupuna awa, kūkūwai and moana of Te Whānau Moana and Te Rorohuri. This undermines and otherwise violates tikanga principles of:
- a. **rangatiratanga**: self-determination requires incorporation of Te Whānau Moana and Te Rorohuri values, stewardship and practices in the management of their rohe. Rangatiratanga requires land-based discharge of wastewater;
 - b. **kaitiakitanga**: placing wastewater in waterbodies diminishes their mauri. As symbols of life and nourishment, waterbodies ought to be protected from impurities. The Proposal prevents Te Whānau Moana and Te Rorohuri from discharging kaitiaki obligations;
 - c. **manaakitanga and whanaungatanga**: placing wastewater in waterbodies does not reflect respect, kindness or upholding relationships. The inability to source food from these waterbodies represents a further hurdle to providing kai to manuhiri;
 - d. **utu**: Waimango and Karikari Moana have acted as a source of physical and spiritual sustenance to Te Whānau Moana and Te Rorohuri. The wider community have benefitted from their uniqueness and significance. This is apparent in the fact that they are identified as outstanding and of high natural character by the regional council. In cultural terms, it is abhorrent to suggest to repay the gifts provided with wastewater.
- 14.6 Among other things, current wastewater discharge practices have harmed the mauri of Waimango and Karikari Moana. Waimango is acutely unwell. Te Whānau Moana and Te Rorohuri values and tikanga require protection and restoration of these bodies.
- 14.7 If granted, the Proposal would cement further diminishment of mauri, violation of Te Whānau Moana and Te Rorohuri tikanga and marginalisation of their values

for at least the life of the resource consent. They will be left to shoulder the whakamā (shame) of the diminishment of their values, traditions and ancestral relationships. This depletes rather than enhances mana.

14.8 As noted above, Te Whānau Moana and Te Rorohuri tikanga requires tangata whenua to refrain from gathering kai from paru areas, such as those that receive wastewater discharges. To this end:

- a. Karikari Moana and Waimango were in many ways pouaka whakamātao (refrigerators) or māra (gardens) for Te Whānau Moana and Te Rorohuri.
- b. traditions and mātauranga are upheld through practice;
- c. Te Whānau Moana and Te Rorohuri have been unable to harvest kai from Karikari Moana and Waimango for a number of years they have been receiving wastewater;
- d. the inability to undertake customary practices impacts the maintenance and transmission of mātauranga. For example, disrupting practice creates gaps in understanding fish, shellfish, plant and wildlife species presence and abundance. Without practice, related mātauranga cannot be transferred to the upcoming generations.

14.9 Practices relating to collecting mahinga kai from Waimango and Karikari Moana have been prevented for a number of years, partly due to the areas being contaminated by wastewater discharge.

14.10 The Proposal will see continued disruption of kawa relating to harvesting and in turn, the loss of mātauranga.

14.11 The effects on taonga plant and bird species that occupy Karikari, Waimango and the surrounding whenua are unclear. Te Whānau Moana and Te Rorohuri have observed a decline in their presence that corresponds with the increase in activities. For Te Whānau Moana and Te Rorohuri, it is not appropriate to allow treated wastewater to wash over Pingao or perforate the kainga of manu, particularly where those species are vulnerable and struggling to survive.

14.12 The effects of the Proposal in the context of climate change are also unclear. With sea levels rising, more frequent extreme weather events and increased temperatures it is difficult to see how increasing the volume of waterbodies could

not have an impact. As a coastal hapū with a web of interconnected waterbodies within their rohe, they feel particularly vulnerable and concerned.

Flood Hazard Risk Assessment

- 14.13 The Flood Hazard Risk Assessment records that a high level desktop exercise was undertaken to understand related risks.
- 14.14 Te Whānau Moana and Te Rorohuri members who have worked on or are familiar with our whenua know that a hard pan sits beneath the whenua. This pan acts as a barrier that prevents surface water from seeping downward. The outcome is, the layer of Papatūānuku that sits above the pan absorbs a certain amount of rain, and then it flows across her. It appears that this has not been factored into the assessment.
- 14.15 Te Whānau Moana and Te Rorohuri are deeply concerned that the WWTP will fail and result in sewage leaks to their tūpuna awa, kūkūwai and Moana. This would intensify the already significant negative cultural effects.
- 14.16 Given the Proposal is located in a culturally sensitive area, Te Whānau Moana and Te Rorohuri expected to see a detailed assessment, particularly as they understand that there is an expected increase in extreme weather events.

Odour Assessment

- 14.17 The Odour Assessment records that there have been no complaints and that the WWTP has an appropriate set back from dwellings. It appears this assessment is also based on a desktop exercise.
- 14.18 Te Whānau Moana and Te Rorohuri do not consider the community complaints to be the start and end point for assessing odour. While they have not complained, they have experienced awful smells coming from the mouth of Wairahoraho and Waimango at times.
- 14.19 Human intervention with Wairahoraho Awa, Waimango and Karikari Moana taints their natural smell. This kind of change represents a degradation of their mauri.

Water Quality Assessment

- 14.20 Council provided the water quality assessment on 12 May 2025. At this time, Te Whānau Moana and Te Rorohuri had held two wānanga. The final wānanga, focused on endorsing this CIA was scheduled for 17 May 2025.
- 14.21 Unfortunately, Te Whānau Moana and Te Rorohuri have not had the time to digest and incorporate the water quality assessment in this CIA. As such, they intend to address any issues they identify in evidence during the hearing process.

15. ADDRESSING ADVERSE EFFECTS

Proposed Conditions

- 15.1 Council offered to establish a committee that included Te Whānau Moana and Te Rorohuri members by conditions. The committee would receive reports and participate in monitoring practices.
- 15.2 Te Whānau Moana and Te Rorohuri view the suggested condition as tantamount to offering a front row seat to observe the desecration of their tūpuna, the debasing of their tikanga and belittling of their mana, integrity, and values.
- 15.3 The proposed condition does not address the effects that will be experienced by Te Whānau Moana and Te Rorohuri in terms of the current or future generations.
- 15.4 Rather than continue a practice that represents an affront to Te Whānau Moana and Te Rorohuri tikanga - values, traditions and ancestral relationships, they consider Council should explore ways that it can discharge wastewater to land. Given the WWTP is located between Rangiputa Station and a golf course, it is disappointing that Council has not investigated whether the wastewater could be discharged to these areas.

Wastewater Plant Design

- 15.5 Te Whānau Moana and Te Rorohuri support the plant design that it treats water to the purest possible standard, no matter where it is located in their rohe.

Process

- 15.6 Te Whānau Moana and Te Rorohuri note the process to date has caused impacts.
- 15.7 The compact timeframes and lack of relevant information mean Te Whānau Moana and Te Rorohuri have made this assessment difficult in some respects.
- 15.8 At the outset, Te Whānau Moana and Te Rorohuri advised they have little resource and time, so they wanted discussions to be focused and transparent. In February 2025 Council advised Te Whānau Moana and Te Rorohuri CIA drafting should occur as engineers were completing an assessment of a “long list” of alternatives. The alternatives concerned five different plants, though on the same whenua, with the same discharge method. On querying financing each of the plants, Council confirmed it was unsure of what it could actually afford. Discussing plants that are not realistically available is not a good use of tribal resource.

Concerns with Current Operation

- 15.9 Council advised that it has not removed the sludge resulting from the existing wastewater plant for the life of its consent. Later, it suggested it may have removed sludge.
- 15.10 Te Whānau Moana and Te Rorohuri are deeply concerned that the failure to remove sludge regularly (if at all) may have caused harm to their waterbodies and the taonga species within, which is undetected as a result of the limited monitoring parameters. For example, it does not test some areas and there is no indication that micro-pharmaceuticals are monitored.
- 15.11 Te Whānau Moana and Te Rorohuri support regularly removing sludge and exploring options for repurposing sludge, no matter where the plant is situated in their rohe.

16. STATUTORY AND PLANNING INSTRUMENTS

- 16.1 This portion of the CIA is not strictly cultural. Te Whānau Moana and Te Rorohuri obtained some pro-bono input from professionals for this section. They considered this necessary as their experience is that local authorities often overlook provisions relevant to tangata whenua.

Resource Management Act

- 16.2 The purpose Resource Management Act 1991 (**RMA**) governs the Proposal. Its purpose is to promote “sustainable management” of natural and physical resources.³
- 16.3 Sustainable management means managing use, development and protection of the environs in a way that, among other things, provides for cultural well-being, while sustaining its potential, safeguarding the life-supporting capacity of water and ecosystems and avoiding, remedying or mitigating adverse effects.⁴
- 16.4 There is a direct connection between the well-being of Te Whānau Moana, Te Rorohuri and the environment within their rohe. Interdependence exists between their well-being and sustaining and safeguarding the environment.
- 16.5 In achieving the RMA's purpose, matters of national importance must be recognised and provided for in making decisions under the RMA. The Proposal engages consideration of the following matters of national importance:⁵
- a. the culture, traditions and ancestral relationships Te Whānau Moana and Te Rorohuri have with their environs are one of these matters, noting they consider these elements to be synonymous with tikanga in many respects;
 - b. preservation of the natural character of the coastal environment, wetlands, rivers and their margins and protection from inappropriate use. Te Whānau Moana and Te Rorohuri consider further contamination of Wairahoraho Awa, Waimango and Karikari Moana inappropriate for the reasons outlined in this CIA;
 - c. protection of outstanding natural features from inappropriate use. Te Whānau Moana and Te Rorohuri consider further contamination of Waimango and Karikari Moana inappropriate for the reasons outlined in this CIA;
 - d. protection of areas of significant indigenous vegetation and habits of indigenous fauna. This CIA identifies that Waimango, Wairahoraho and Karikari Moana provide kainga for manu that are vulnerable to extinction.

³ RMA, s 5(1).

⁴ RMA, s 5(2).

⁵ RMA, ss. 6(a) – (c), (e).

- 16.6 Decision-makers must also have particular regard to kaitiakitanga.⁶ The RMA defines kaitiakitanga to be the exercise of guardianship by the tangata whenua of an area in accordance with tikanga Māori in relation to the natural and physical resources.
- 16.7 As outlined in this CIA, Te Whānau Moana and Te Rorohuri consider their culture and traditions to require guardianship of the intangible as well as the tangible.
- 16.8 The principles of Te Tiriti o Waitangi must also be accounted for by decision-makers.⁷
- 16.9 Te Whānau Moana and Te Rorohuri say the following principles are especially relevant to the Proposal:
- a. **tino rangatiratanga**: the right to make decisions and exercise mana whakahaere (authority) over, among other things, the environment within their rohe;
 - b. **active protection**: the duty to actively protect their interests relating to the environment, inclusive of their relationships, tikanga and kawa. The duty to ensure their interests, knowledge and experience are understood and valued;
 - c. **reciprocity**: the exchange of the right to govern for the right to retain full tribal authority over their lands, waters and other taonga;
 - d. **partnership**: the mutual obligation to with good faith, fairly and reasonably, to share information and be fully informed in decision making processes. Open, timely and transparent communication is one way of achieving informed decision making.

Planning Instruments

- 16.10 Key planning instruments that are relevant to the Proposal include the:
- a. New Zealand Coastal Policy Statement 2010 (**NZCPS**);
 - b. National Policy Statement for Freshwater Management 2020 (**NPSFM**);

⁶ RMA, s 7(a).

⁷ RMA, s 8.

- c. National Policy Statement for Indigenous Biodiversity 2023 (**NPSIB**);
- d. Northland Regional Policy Statement (**RPS**) and Regional Plan (**RP**);
- e. Far North District Council Operative District Plan (**DP**) and Proposed Plan (**PDP**).

16.11 Especially relevant NZCPS provisions require:

- a. preservation of the coastal environment's natural character and protection of natural landscapes;⁸
- b. the principles of Te Tiriti o Waitangi to be taken into account and honoured;⁹
- c. a precautionary approach to be adopted where effects are uncertain, unknown or little understood but potentially significantly adverse;¹⁰
- d. integrated management;¹¹
- e. protection of indigenous biodiversity;¹²
- f. restoration of natural character;¹³
- g. enhancement of water quality where water in the coastal environment has deteriorated;¹⁴
- h. careful consideration of contaminants being discharged to the coastal environment.¹⁵

16.12 NPSFM provisions that are relevant to the Proposal include:

- a. Te Mana o Te Wai is relevant to all freshwater management. This refers to protecting the freshwater mauri, health, well-being and the wider environment. Te Mana o Te Wai principles include mana whakahaere, kaitiakitanga and manaakitanga;¹⁶

⁸ NZCPS, Obj. 2, Pol. 1, 13, 15.

⁹ NZCPS, Obj. 3, Pol. 2.

¹⁰ NZCPS, Pol. 3.

¹¹ NZCPS, Pol. 4.

¹² NZCPS, Pol. 11.

¹³ NZCPS, Pol. 14.

¹⁴ NZCPS, Pol. 21.

¹⁵ NZCPS, Pol. 23.

¹⁶ NPSFM, Subpart 1.3(1) – (4).

- b. freshwater must be managed in a way that gives effect to Te Mana o Te Wai;¹⁷
- c. tangata whenua are to be actively involved in freshwater management and their values are identified and provided for;¹⁸
- d. integrated management of freshwater is required, ki uta ki tai and as a part of an integrated response to climate change;¹⁹
- e. the health and well-being of degraded freshwater bodies and ecosystems is improved;²⁰
- f. there is no further loss of the extent of natural inland wetlands, their values are protected and their restoration promoted;²¹
- g. loss of river extent and values are avoided to the extent practicable;²²
- h. the habitats of indigenous freshwater species are protected;²³
- i. the condition of waterbodies and their ecosystems are systematically monitored and action is taken where freshwater is degraded and deteriorating trends reversed;²⁴
- j. communities are able to provide for their social and cultural well-being in a way that is consistent with the NPSFM;²⁵
- k. where river or wetland values are impacted, effects must be managed in accordance with the effects management hierarchy. Where practicable, adverse effects are avoided, then minimised, with more than minor residual effects offset, then compensated. If compensation is not appropriate, the activity must be avoided.²⁶

16.13 RPS provisions of particular relevance require:

17 NPSFM, Pol 1.
 18 NPSFM, Pol 2.
 19 NPSFM, Subpart 3.5(1), (3), Pol 4.
 20 NPSFM, Pol 5.
 21 NPSFM, Pol 6, Subpart 3.22.
 22 NPSFM, Pol 7, Supart 3.24.
 23 NPSFM, Pol 9.
 24 NPSFM, Pol 13.
 25 NPSFM, Pol 15.
 26 NPSFM, Subparts 3.21, 3.22, 3.24.

- a. identification of significant indigenous vegetation and habitats using set factors, noting Waimango appears to meet one or more;²⁷
- b. avoidance of adverse effects on indigenous taxa listed as threatened or at risk and significant native vegetation and habitats;²⁸
- c. avoidance of adverse effects on habitats of indigenous species used for cultural purposes;²⁹
- d. avoidance of adverse effects of use on the characteristics and qualities that make up outstanding values of natural character and landscapes;³⁰

16.14 RP provisions of particular relevance require:

- a. identification of places of significance to tangata whenua;³¹
- b. consideration of the extent to which the Proposal will have an adverse effect on the life supporting capacity of freshwater, their ecosystems and to which more than minor effects will be avoided;³²
- c. avoidance of adverse effects on the characteristics, qualities and values that contribute to make an area an outstanding natural landscape or toward natural character;³³
- d. avoidance of adverse effects on native taxa listed as threatened or at risk and on the values and characteristics of areas of indigenous vegetation and habitats assessed as significant;³⁴
- e. avoidance of significant adverse effects on habitats of native species that are important for cultural purposes;³⁵
- f. avoidance of significant adverse effects on indigenous ecosystems and habitats that are particularly vulnerable to modification, including coastal wetlands, spawning and nursery areas and saltmarsh;³⁶

²⁷ RPS, App. 5.

²⁸ RPS, Pol 4.4.1(1), within the coastal environment.

²⁹ RPS, Pol 4.4.1(2)(b), within the coastal environment.

³⁰ RPS Pol 4.6.1(1), within the coastal environment.

³¹ RP, Pol D.1.5.

³² RP, Pol D.4.5(1) – (2).

³³ RP, D.2.17(1), within the coastal environment.

³⁴ RP, D.2.18(1)(a), within the coastal environment.

³⁵ RP, Pol D.2.18(1)(b)(ii).

³⁶ RP, Pol D.2.18(b)(iii).

- g. a precautionary approach to managing effects on significant native biodiversity;³⁷
- h. protection of natural inland wetland values and promotion of protection of their values;³⁸
- i. avoidance of the loss of river values unless there is a functional need for the activity in that location and the effects management hierarchy is applied;³⁹
- j. disturbance of indigenous vegetation in a significant wetland to be classified as a non-comply activity.⁴⁰

16.15 Especially relevant DP provisions require:

- a. rights guaranteed by Te Tiriti o Waitangi to be given effect by, among other things, identify and protecting taonga;⁴¹
- b. use of the coastal environment only occurs where the activity recognises Māori culture, traditions, and ancestral relationships, avoids adverse effects on cultural value, and significant flora and fauna as far as practicable, is located so as to minimise adverse effects on natural character;⁴²
- c. activities to avoid, remedy or mitigate significant adverse effects on natural and cultural values and elements that make up the distinctive character or outstanding natural landscape;⁴³
- d. cumulative effects of changes to the character of outstanding landscapes to be taken into account;⁴⁴
- e. a trend towards enhancement rather than deterioration of landscape values, including encouragement of restoration where a landscape is degraded.⁴⁵

³⁷ RP, Pol D.2.20.
³⁸ RP, Pol D.4.23.
³⁹ RP, Pol. D.4.30.
⁴⁰ RP, Pol. C.2.2.6(1).
⁴¹ DP, Obj. 2.7.1, Pol. 2,8,5.
⁴² DP, Pol. 10.4.1.
⁴³ DP, Pol. 12.1.4.2.
⁴⁴ DP, Pol. 12.1.4.3.
⁴⁵ DP, Pol. 12.1.4.8.

16.16 Especially relevant PDP provisions require:

- a. protection of cultural resources and other taonga by scheduling sites of significance and recognising the significance of the cultural landscape;⁴⁶
- b. recognition of tangata whenua as specialists in **their** own tikanga;⁴⁷
- c. identification of cultural sites of significance using the RPS criteria and protection of those sites;⁴⁸
- d. identification of areas of significant vegetation and habitats using a set criteria and avoid adverse effects on these areas;⁴⁹
- e. encouragement of restoration and enhancement of wetland and river margins;⁵⁰
- f. avoidance of adverse effects on outstanding landscapes and features;⁵¹
- g. land use effects to be managed, with consideration of the historical, spiritual and cultural associations held by tangata whenua.⁵²

⁴⁶ PDP, Pol. TW-P2.

⁴⁷ PDP, Pol TW-P5.

⁴⁸ PDP, Pol. SASM P1, P2.

⁴⁹ PDP, Pol. IB-P1, P2, within the coastal environment.

⁵⁰ PDP, Pol. NATC-P4.

⁵¹ PDP, Pol. NFL-P3, within the coastal environment.

⁵² PDP, Pol NFL-P8.

APPENDICES

ATTACHMENT A

PROPOSAL OVERVIEW



To: Haititaimarangai Marae
Cc: Nina Raharuhi & Thomson Lawrence

31 July 2024

Tēnā kōrua,

RE: NOTICE OF RESOURCE CONSENT APPLICATION FOR THE WHATUWHIWHI WASTEWATER TREATMENT PLANT

The Far North District Council (FNDC) wishes to inform and engage with Haititaimarangai marae about preparing an application for resource consent for the Whatuwhiwhi Wastewater Treatment Plant (WWTP).

Whatuwhiwhi Wastewater Treatment Plant:

The Whatuwhiwhi WWTP is located off of Inland Road on the Karikari Peninsula on the east coast of the Far North.

Current consents:

Currently, FNDC holds the following consents, originally issued 8 July 2011 with minor corrections made and authorised on 27th June 2023:

- AUT.007203.02.02 To discharge contaminants to land from the outlet of the treatment system and via seepage from the base of the treatment system.
- AUT.007203.03.02 To discharge contaminants (primarily odour) to air.

These consents are due to expire 30 November 2025.

A replacement resource consent application is planned to be lodged by **30th April 2025 in accordance with Section 124(1) Resource Management Act 1991 (RMA) statutory timeframes.**

Engagement with iwi, hapū and key stakeholders:

FNDC would like to meet with Haititaimarangai Marae and other local hapū and iwi in the area of the Whatuwhiwhi WWTP to discuss how iwi and hapū would like to be engaged on this consenting project. Some ideas on what collaboration could look like is working together on the best practicable option, understand the cultural effects as a result of the discharge and the impacts on those values and how these could be mitigated through consent conditions and other topics related to the resource consent application that would be of interest to iwi and hapū.

Next steps:

Please indicate some available days and times in August or early September to give us the opportunity for whakawhanaungatanga with each other and the consultants who have been engaged to provide technical assistance and advice for this resource consent application.

Look forward to your response.

Ngā mihi,

Simone Elsmore,
Infrastructure Consenting Team Leader

Resource Consent

FILE: 7203
(02 and 03)
Correction

Document Date: 27.06.2023

*Pursuant to the Resource Management Act 1991, the Northland Regional Council
(hereinafter called "the council") does hereby grant a Resource Consent to:*

FAR NORTH DISTRICT COUNCIL

To undertake the following activities associated with the operation of the Whatuwhiwi Wastewater Treatment Plant on Lot 1 DP 52317 Blk IV Karikari SD, at or about location co-ordinates 1633600E 6141700N (Note: All location co-ordinates in this document refer to Geodetic Datum 2000, New Zealand Traverse Mercator Projection):

AUT.007203.02.02 To discharge contaminants to land from the outlet of the treatment system and via seepage from the base of the treatment system.

AUT.007203.03.02 To discharge contaminants (primarily odour) to air.

Subject to the following conditions:

AUT.007203.02 - Discharge to Land

- 1 The quantity of wastewater discharged to land from the outlet of the treatment system shall not exceed 700 cubic metres per day, based on average dry weather inflows to the treatment system. For compliance purposes the "average dry weather flow" shall be calculated in accordance with the details provided in Schedule 1 (attached).
- 2 The Consent Holder shall minimise, as far as practicable, any increase in the quantity of wastewater entering the treatment system as a result of stormwater inflow and infiltration to the sewers.

Advice Note: *A significant increase in the quantity of wastewater entering the treatment plant during wet weather periods can have a significant adverse effect on the treatment efficiency of the plant, thereby increasing the potential for adverse effects from the discharge.*

The correct design, construction and maintenance of the wastewater reticulation network, including the connections to private lots, are major factors in minimising the volume of stormwater inflow and infiltration during wet weather periods.

- 3 To enable the collection of wastewater samples, the Consent Holder shall, within one month of the date of commencement of these consents, provide and maintain easy and safe access to NRC Sampling Site 105629: Treatment system outlet.

- 4 The Consent Holder shall, within three years of the date of commencement of these consents, upgrade the treatment system so that:
- (a) The quality of the treated wastewater discharged from the outlet of the treatment system meets the discharge standards specified in Condition 8;
 - (b) A meter that has an accuracy of $\pm 5\%$ is installed, and then maintained, prior to the inlet to the treatment system to record the total wastewater inflow rates and volumes. This meter shall then be used to determine compliance with the requirements of Condition 1 and 2; and
 - (c) The direct discharge from the wetland outlet into the marsh drain ceases and the treated wastewater from the wetland outlet is discharged to land via a disposal system that evenly distributes the wastewater to the surface of that part of Lot 1 DP 52317 which is not being occupied by the treatment system.
- 5 Once the upgraded treatment system has been commissioned, the Consent Holder shall ensure that all wastewater receives treatment within the upgraded treatment system prior to it being discharged to land from the outlet of the treatment system.
- 6 The Consent Holder shall ensure that the upgraded treatment system is, at all times, connected to, and actively communicating with, the Far North District Council's telemetry system for wastewater treatment systems. The telemetry system shall be capable of, and utilised for, notifying the operator of the telemetry system of at least the following:
- (a) Any failure of mechanical equipment within the treatment system due to either electrical or mechanical faults; and
 - (b) If a disinfection system is installed, any electrical or mechanical failures within the disinfection system, including any parameter measurement device installed within the disinfection system.
- 7 There shall be no discharge of gross solids from the outlet of the treatment system, as a result of the exercise of these consents. For the purpose of this condition, "gross solids" shall be defined as any material (organic or inorganic) within the discharge that is visible to the naked eye.
- 8 Once the upgraded treatment plant has been commissioned, the concentration of the following determinands within the treated wastewater, as measured at NRC Sampling Site 308643 – Post UV Treatment, shall not exceed the following:

Determinand	Median	90 th Percentile
5 day Biochemical Oxygen Demand (grams per cubic metre)	30	50
Total Suspended Solids (grams per cubic metre)	30	40
Faecal Coliform (per 100 millilitres)	500	2,600
Total ammoniacal nitrogen (grams per cubic metre)	30	50

- 9 Notwithstanding any other conditions, the exercise of these consents shall not cause any of the following effects in the water quality of the Waimango Swamp:
- (a) The production of any conspicuous oil or grease films, scums or foams;
 - (b) Any emission of objectionable odour;

- (c) The four-day average concentration of total ammoniacal nitrogen $[(\text{NH}_3 + \text{NH}_4)\text{-N}]$ shall not exceed the following:

pH	Total Ammoniacal Nitrogen, $[(\text{NH}_3 + \text{NH}_4)\text{-N}] \text{ g/m}^3$				
	10°C	15°C	20°C	25°C	30°C
6.50	1.81	1.81	1.22	0.86	0.60
6.75	1.81	1.81	1.22	0.86	0.60
7.00	1.81	1.81	1.22	0.86	0.61
7.25	1.81	1.81	1.23	0.86	0.61
7.50	1.81	1.81	1.23	0.86	0.61
7.75	1.73	1.64	1.15	0.81	0.58
8.00	1.13	1.09	0.76	0.54	0.39
8.25	0.64	0.62	0.44	0.32	0.23
8.50	0.37	0.36	0.26	0.19	0.14

- (d) Any significant adverse effects on aquatic life.

In addition, the exercise of these consents shall not result in a more than minor increase in the extent of eutrophic wetland vegetation that is adjacent to both Lot 1 DP 52317 and any unnamed tributary/drain that flows from Lot 1 DP 52317 into the natural wetland.

For compliance purposes, "a more than minor increase in the extent of eutrophic wetland vegetation" shall be assessed against the results of a baseline vegetation survey of the wetland areas that are adjacent to both Lot 1 DP 52317 and any unnamed tributary that flows from Lot 1 DP 52317 into the natural wetland. This baseline vegetation survey shall be undertaken by a suitably qualified and experienced person and shall provide details of the species of vegetation present adjacent to both Lot 1 DP 52317 and any unnamed tributary/drain that flows from Lot 1 DP 52317 into the natural wetland, and the extent of eutrophic wetland vegetation in these areas. A copy of the results of the survey shall be forwarded to the Regional Council within 3 months of the date of commencement of this consent.

AUT.007203.03 - Discharge to Air

- 10 The Consent Holder's operations shall not give rise to any discharge of contaminants at or beyond the boundary of Lot 1 DP 52317, which is deemed by a suitably trained and experienced Enforcement Officer of the Regional Council to be noxious, dangerous, offensive or objectionable to such an extent that it has, or is likely to have, an adverse effect on the environment.

General Conditions

- 11 The Consent Holder shall notify the Regional Council in writing of any new connection that will discharge any industrial or trade wastewater to the treatment system, at least two weeks prior to that connection occurring.
- 12 The Consent Holder shall maintain the wastewater treatment system so that it operates effectively at all times. This maintenance shall include, but not be limited to the monitoring of sludge levels within the treatment system and the annual calibration of the wastewater flow meter installed on the inlet to the treatment system.

A written record of all maintenance undertaken shall be kept and a copy of this record shall be forwarded to the Regional Council immediately upon written request by the Regional Council.

- 13 The Consent Holder shall monitor these consents in accordance with Schedule 1 (**attached**).
- 14 The Consent Holder shall, for the purposes of adequately monitoring these consents as required under Section 35 of the Resource Management Act 1991, on becoming aware of any contaminant associated with the Consent Holder's operations escaping otherwise than in conformity with these consents:
- (a) Immediately take such action, or execute such work as may be necessary, to stop and/or contain such escape;
 - (b) Immediately notify the Regional Council by telephone of an escape of contaminant;
 - (c) Take all reasonable steps to remedy or mitigate any adverse effects on the environment resulting from the escape; and
 - (d) Report to the Regional Council in writing within one week on the cause of the escape of the contaminant and the steps taken or being taken to effectively control or prevent such escape.
- 15 The Regional Council may, in accordance with Section 128 of the Resource Management Act 1991, serve notice on the Consent Holder of its intention to review the conditions of these consents annually during the month of June. The review may be initiated for any one or more of the following purposes:
- (a) To deal with any adverse effects on the environment that may arise from the exercise of these consents and which it is appropriate to deal with at a later stage, or to deal with any such effects following assessment of the results of the monitoring of the consent and/or as a result of the Regional Council's monitoring of the state of the environment in the area;
 - (b) To require the adoption of the best practicable option to remove or reduce any adverse effect on the environment;
 - (c) To provide for compliance with rules in any regional plan that has been made operative since the commencement of the consent;
 - (d) To deal with any inadequacies or inconsistencies the Regional Council considers there to be in the conditions of these consents, following the establishment of the activity the subject of these consents;
 - (e) To change existing, or impose new limits on, conditions relating to the quality of the discharge and the receiving waters; and
 - (f) To deal with any material inaccuracies that may in future be found in the information made available with the application (notice may be served at any time for this reason).

The Consent Holder shall meet all reasonable costs of any such review.

EXPIRY DATE: 30 NOVEMBER 2025

These consents were granted on 8 July 2011 under delegated authority from the council by Rob Lieffering, Consents Senior Programme Manager. Pursuant to Section 133A of the Resource Management Act 1991, minor corrections have been made to Condition 8 and Schedule 1 which have been authorised under delegated authority from the council by Stuart Savill, Consents Manager on 27 June 2023.

ATTACHMENT B

Minutes of Online Hui 4th October 2024



www.fndc.govt.nz
Memorial Ave, Kaikohe 0440
Private Bag 752, Kaikohe 0440
Phone 0800 920 029

Minutes

Whatuwhiwhi Wastewater Treatment Plant (WWTP) Resource Consent Renewal

What: Meet and greet online and discuss Whatuwhiwhi WWTP Resource Consent Renewal

Where: Microsoft Teams (Online)

When: Friday 4th October 2024

Time: 1pm to 2pm

Attendees:

Far North District Council (FNDC)

NgatiKahu Station 438 Ahuwhenua Trust

Simone Elsmore
Infrastructure Consenting Team Leader

Karena Hita
Chairwoman

Louise Wilson
Senior Infrastructure Planner

Troy Ulrich
Whānau member

Dena-Maree Hemara
Kaiārahi Kaupapa Māori

Tracey Haretuku
Whānau member

Karakia and introductions were made.

Kaupapa: Whatuwhiwhi WWTP Resource Consent Renewal

Facilitator: Simone Elsmore

- FNDC is right at the beginning of the process and wanting to include hapu concerns and issues when briefing our consultants. This could include face to face hui where hapu can meet our engineer and ecologist.
- Consent will expire in November 2025. FNDC would like to lodge replacement application in April 2025 so that treatment plant remains lawful until a decision is made about the replacement consent.
- The best practicable option has not yet been determined. The existing wastewater scheme was discussed. FNDC confirmed no other option has been explored and that is part of this process.
- Hapū queried the feasibility of developing a new proposal in a 6 month timeframe. FNDC indicated the current wastewater scheme may be an interim measure to allow for a better option, if necessary.
- Waimango and Karikari Moana are being treated as the receiving environment. FNDC would like an cultural effects assessment for this area.
- All acknowledged hapuu have been provided a high level letter and the existing consent conditions rather than the details of any wastewater scheme proposal. All agreed details are needed to assess cultural effects.
- Other wastewater scheme consent has had conditions requiring the investigation of alternative locations if there are concerns about the current discharge location.
- The current discharge is to a wetland that eventually flows via a river into the Waimango (see aerial photo below)

- The plant has generally complied with consent conditions since the UV units was installed. However, FNDC acknowledge the consent was issued in 2011. Attitudes and legal requirements regarding water have changed in that time and the appropriateness of the consent conditions needs to be assessed.
- Hapū queried the existing consent condition that required discharge to land.
- All acknowledged the existing consent has no provision for cultural matters, which could be explored in the new resource consent application process.
- Louise will create a timeline of when the plant was constructed, significant upgrades and any changes to the resource consent conditions.
- Simone would like to confirm who to liaise with about this application. This will enable FNDC to provide koha to people who are giving up their time to help us understand the issues and opportunities associated with managing wastewater at Whatuwhiwhi.
- We look forward to working out a time, location and agenda for our next hui.



ACTIONS

- Hapū to confirm a time for next meeting and where (happy to have online or in person)
- Invite consultants to next meeting who will be completing the technical assessments that provide the evidence for the consent application

ATTACHMENT C

Air Quality Odour Assessment



21 October 2024

Louise Wilson
Senior Infrastructure Planner - Infrastructure Strategy
Far North District Council

Air Quality (Odour) Assessment – Application for Discharge to Air – Resource Consent for
Whatuwhiwhi Wastewater Treatment Plant

1-14657.00

Dear Louise,

1 Introduction

This letter report provides Far North District Council (FNDC) with a qualitative assessment of potential odour affects associated with the operations at the wastewater treatment plant (WWTP) located off Inland Road in Whatuwhiwhi. Figure 1 shows the location and schematic of the WWTP, provided by FNDC.

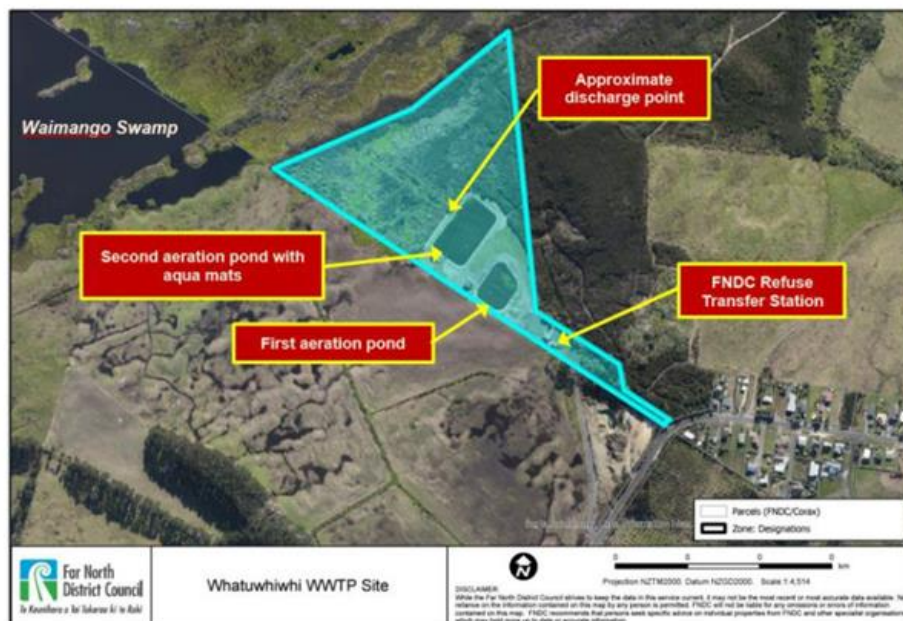


Figure 1 Site location of the Whatuwhiwhi WWTP.

FNDC currently holds resource consent AUT.007203.03.02, which was granted by Northland Regional Council (NRC) on 8 July 2011. This consent expires on 30 November 2032.

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This letter is limited to a qualitative assessment of potential odour effects associated with the Whatuwhiwhi WWTP. There is a community refuse transfer station on-site that operates under the same resource consent.

2 Description of Site and Environment

2.1 Overview

The WWTP is located off Inland Road on the Karikari Peninsula, on a relatively flat topography, adjacent to swamps, wetlands and coastal lands. The WWTP receives wastewater from coastal settlements of Whatuwhiwhi and Tokerau Beach, which are approximately 1.5 km away from the WWTP. The general population of the settlements fluctuates between seasons with 450 during the winter periods and up to 1,500 during summer periods.¹

These settlements are a mixture of dwellings and commercial activities. There are no industrial activities identified in the FNDC proposed district plan. Figure 2 shows the land uses surrounding the WWTP, as provided by FNDC. According to the FNDC-proposed district plan, the surrounding the land uses includes the following:

- Coastal, general coastal and coastal living
- Carrington Estate which includes a Golf course, vineyard
- Residential and commercial
- Recreational activities and holiday parks.

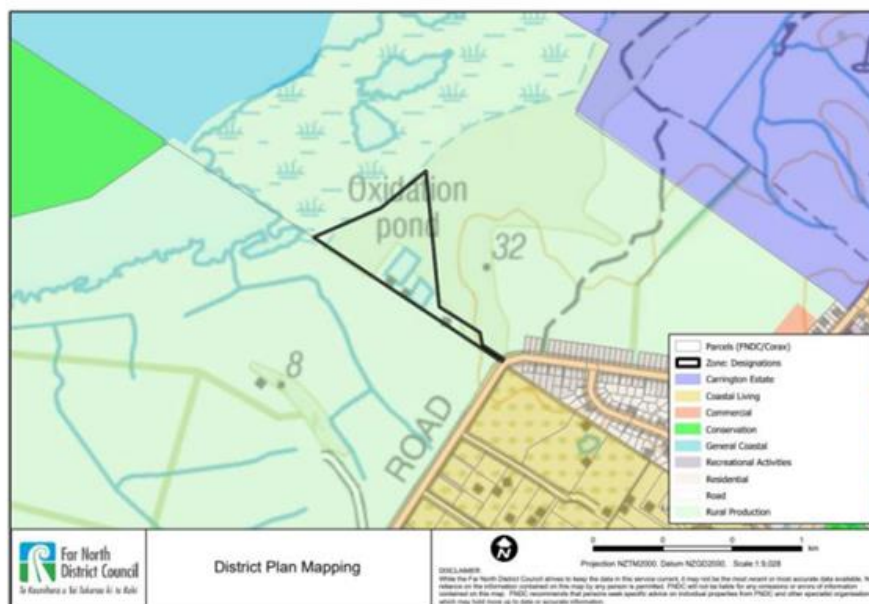


Figure 2 WWTP location and surrounding land uses.

¹ <https://www.fndc.govt.nz/services/wastewater-and-stormwater/Wastewater/wastewater-treatment-plants/Whatuwhiwhi-Wastewater-Treatment-Plant>

3 Odour Assessment

3.1 Background Air Quality - Odour Sources

The Whatuwhiwhi community refuse transfer station is located within the same property boundary. Other than the refuse transfer station, there are no other significant sources of odour in the area.

The surrounding environment may be affected by natural odours associated with the ocean and beach. However, as these would be of a different character, there is not expected to be any potential for cumulative effects in combination with odours originating from the WWTP.

3.2 Odour Complaints

WSP understands that FNDC has not received any complaints relating to odour from the local community.

3.3 Separation Distance Guidelines

There is currently no New Zealand or regional guidance on separation distance for WWTP facilities. In WSP's experience, the Australian Environment Protection Authority (EPA) Victoria provides an appropriate recommended distance for determining the extent of potential odour effects from WWTPs.

A review of the separation distance guidance for WWTPs was based on the following guidelines promulgated by EPA Victoria²:

EPA Victoria recommends separation distances for different types of sewage installations and based on the population that the WWTP it serves. For aerobic pondage systems such as Whatuwhiwhi, the separation distance is calculated as follows:

$$\text{separation distance, metres} = 5 n^{1/2}$$

Where n is the population served by the WWTP.

For the current population based in winter (450) and summer (1,500), the calculated separation distances are 106 m and 194 m, respectively. Allowing for a 20 % increase in population, and concurrent increase in capacity of the WWTP, these values would rise to 116 m and 212 m, respectively.

The recommended separation distance for a waste transfer station is 250 m.

The closest dwellings are approximately 300 m from the WWTP's closest aerobic pond and the waste transfer station. These residences are beyond the separation distance and therefore not expected to experience residual odours.

² Environment Protection Authority (EPA) Victoria: *Recommended separation distances for industrial residual air emissions*. March 2013.



4 Conclusion

Based on the provided information and WSP's findings, since FNDC has not received any odour complaints from the WWTP and the nearest dwelling is beyond the calculated separation distance, it can be concluded that no offensive or objectionable odour originating from the Whatuwhiwhi WWTP or the waste transfer station is expected in the closest communities to the WWTP.

5 Report Limitations

This report ('Report') has been prepared by WSP New Zealand Limited ('WSP') exclusively for Far North District Council ('Client') in relation to Air Quality Odour Assessment ('Purpose') and in accordance with the Short Form Agreement dated 14 August 2024 ('Agreement'). The findings in this Report are based on and are subject to the assumptions specified in the Report. WSP accepts no liability whatsoever for any use or reliance on this Report, in whole or in part, for any purpose other than the Purpose or for any use or reliance on this Report by any third party.

In preparing this Report, WSP has relied upon data, surveys, analyses, designs, plans and other information ('Client Data') provided by or on behalf of the Client. Except as otherwise stated in this Report, WSP has not verified the accuracy or completeness of the Client Data. To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in this Report are based in whole or part on the Client Data, those conclusions are contingent upon the accuracy and completeness of the Client Data. WSP will not be liable for any incorrect conclusions or findings in the Report should any Client Data be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to WSP.

6 Closure

If there are any queries related to this letter report, please do not hesitate to contact the undersigned.

Regards,

Authored by:

Darlene Adrian
Environmental Scientist – Air Quality

Reviewed by:

Neil Gimson
Principal Air Quality Scientist



Far North District Council
**Whatuwhiwhi Wastewater Treatment
Plant Water Quality Assessment**

12 May 2025

1-14657.00



4 RECOMMENDATIONS

As a result of the above assessment, the following recommendations are made, with the intention they are incorporated into, or inform, proposed conditions of consent. These conditions are only part of the expected condition set, to monitoring and propose discharge standards for the W-WWTP, with reporting requirements and other standard consent conditions not addressed. It is noted that crafting of consent conditions is a technical skill within the remit of a resource consent planner, and therefore wording may change between the below recommendations and proposed conditions:

- Discharge monitoring:
 - Following commissioning of the fully upgraded W-WWTP, monthly water sampling should be undertaken at the point of discharge, and at a point representing reasonable mixing in the receiving environment;
 - Water sampling should be undertaken by a suitably trained person, and in compliance with National Environmental Monitoring Standards (NEMS, 2019). Samples should be sent to a suitably accredited laboratory for sample processing in lines with the requirements of the NEMS (2019);
 - The reasonable mixing location should be identified in consultation with the Northland Regional Council, however as a starting point, this could be considered as 50m from the point of discharge, given the discharge appears to be flowing water at this point;
 - Once an agreed reasonable mixing locations is determined, an accessway and associated infrastructure should be constructed such that safe monitoring can be undertaken at all times of year;
 - Monitoring should be for the following parameters:

Parameter	Discharge Monitoring	Receiving Environment
Total Nitrogen	x	x
Nitrate	x	x
Nitrite	x	x
Ammoniacal Nitrogen	x	x
Dissolved Inorganic Nitrogen (by calculation)	x	x
Total Phosphorus	x	x
Dissolved Reactive Phosphorus	x	x
<i>E. coli</i>	x	x
Total suspended solids	x	x
5-day Biological Oxygen Demand	x	x
Dissolved Oxygen (mg/L and % saturation)	x	x
Temperature		x
pH	x	x
Zinc	x	x
Dissolved Copper	x	x
Total Hardness (as CaCO ₃)		x
Dissolved Organic Carbon (DOC)		x

- Monitoring for Copper and Zinc (and their associated parameters DOC and Hardness respectively) to occur monthly for one year only.

- Discharge standards -at the point of discharge, following commissioning of the fully upgraded W-WWTP should include:
 - Annual median *E. coli* concentrations not to exceed 130 MPN/100 mL and annual 95th percentile not to exceed 1200 MPN/100 mL;
 - Total Suspended Solids not to exceed an annual average 10 mg/L, and annual 90th percentile of 15 mg/L;
 - 5-day Biological Oxygen Demand not to exceed an annual average 15 mg/L, and annual 90th percentile 25 mg/L;
- Discharge standards -at the point of reasonable mixing, following commissioning of the fully upgraded W-WWTP should include:
 - annual median concentration of ammoniacal nitrogen not to exceed 0.24 mg/L and annual 95th percentile not to exceed 0.4 mg/L following pH adjustment;
 - annual median concentration of nitrate not to exceed 2.4 mg/L and annual 95th percentile not to exceed 3.5 mg/L;
 - Copper and Zinc to be assessed against appropriate guideline values in the *Australian and New Zealand Guidelines for Fresh and Marine Water Quality*. Annual median concentrations not to exceed the 95% species protection thresholds therein following adjustment.
- Vegetation surveys undertaken by Wildlands Consultants in 2016 and 2019 should be repeated, to confirm the current understanding that elevated concentrations of nutrients being discharged from the W-WWTP are having no eutrophication effect in the receiving environment;
 - These should be undertaken by a suitably qualified expert;
 - Surveys should be undertaken at the locations and following the protocols identified in the Wildlands Consultants 2016 report;
 - This should occur following upgrade and commissioning of the W-WWTP upgrades and every five years thereafter;
 - There should be no more than minor increase in the extent of eutrophic wetland vegetation assessed against the results provided in the Wildlands Consultants 2016 report;
 - There shall be no statistically significant increase in nutrient concentration in leaf material between impact and control plots, as identified in the Wildlands Consultants 2016 report.

5 LIMITATIONS

This report ('Report') has been prepared by WSP New Zealand Limited ('WSP') exclusively for Far North District Council ('Client') in relation to a water quality technical assessment ('Purpose') and in accordance with the Short Form Agreement dated 14/08/2024 ('Agreement'). The findings in this Report are based on and are subject to the assumptions specified in the Report and in the pricing schedule dated 07 August 2024. WSP accepts no liability whatsoever for any use or reliance on this Report, in whole or in part, for any purpose other than the Purpose or for any use or reliance on this Report by any third party.

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