

NPDC Urenui and Onaero Beach Camps

Monitoring Programme

Annual Report

2021-2022

Technical Report 2022-61



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Taranaki Regional Council
Private Bag 713
Stratford

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Executive summary

New Plymouth District Council (NPDC) operates the sewage disposal systems located at Urenui Beach Camp and Onaero Bay Holiday Park. NPDC holds resource consents to allow it to discharge septic tank treated sewage to groundwater via infiltration trenches at each of the beach camps.

This report for the period July 2021 to June 2022 describes the monitoring programme implemented by the Taranaki Regional Council (the Council) to assess NPDC's environmental and consent compliance performance during the period under review. The report also details the results of the monitoring undertaken and assesses the environmental effects of the NPDC's activities.

During the monitoring period, NPDC demonstrated an overall level of environmental performance that requires improvement and a high level of administrative performance.

NPDC holds one consent at Urenui, and one consent at Onaero, that each include five conditions setting out the requirements that NPDC must satisfy.

The Council's monitoring programme for the year under review included three inspections at each beach camp and one low tide bacteriological sampling survey of four sites at Urenui Beach Camp, and five sites at Onaero Bay Holiday Park. As in previous years, the bacteriological monitoring did not detect any adverse environmental effects caused by the beach camps' wastewater systems during the 2021-2022 monitoring period.

NPDC is currently under Abatement Notices EAC-23206 and EAC-23207 for exceeding the consented limits of wastewater effluent volumes discharged to the soakage trenches at both Urenui Beach Camp and Onaero Holiday Park. No adverse effects have been identified in relation to these discharges and NPDC are being pro-active in their efforts to resolve the issues.

There were no unauthorised incident/s recording non-compliance in respect of this consent holder during the period under review.

For reference, in the 2021-2022 year, consent holders were found to achieve a high level of environmental performance and compliance for 88% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 10% of the consents, a good level of environmental performance and compliance was achieved.

In terms of overall environmental and compliance performance by the consent holder over the last several years, this report shows that the consent holder's performance remains at a level that requires improvement in the year under review.

This report includes recommendations for the 2022-2023 year.

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1 Introduction

1.1 Compliance monitoring programme reports and the Resource Management Act 1991

1.1.1 Introduction

This report is for the period July 2021 to June 2022 by the Taranaki Regional Council (the Council) describing the monitoring programme associated with resource consents held by New Plymouth District Council (NPDC) for the disposal of treated sewage at the Urenui Beach Camp and Onaero Bay Holiday Park. NPDC operates the wastewater treatment systems at each of the beach camps.

This report covers the results and findings of the monitoring programme implemented by the Council in respect of the consents held by NPDC that relate to discharges of septic tank treated sewage effluent to groundwater via soakage trenches. This is the 32nd report to be prepared by the Council to cover NPDC's water discharges and their effects.

1.1.2 Structure of this report

Section 1 of this report is a background section. It sets out general information about:

- consent compliance monitoring under the *Resource Management Act 1991* (RMA) and the Council's obligations;
- the Council's approach to monitoring sites through annual programmes;
- the resource consents held by NPDC for the two beach camps;
- the nature of the monitoring programme in place for the period under review; and
- a description of the activities and operations conducted at the two beach camps.

Section 2 presents the results of monitoring during the period under review, including scientific and technical data.

Section 3 discusses the results, their interpretations, and their significance for the environment.

Section 4 presents recommendations to be implemented in the 2022-2023 monitoring year.

A glossary of common abbreviations and scientific terms, and a bibliography, are presented at the end of the report.

1.1.3 The Resource Management Act 1991 and monitoring

The RMA primarily addresses environmental 'effects' which are defined as positive or adverse, temporary or permanent, past, present or future, or cumulative. Effects may arise in relation to:

- a. the neighbourhood or the wider community around an activity, and may include cultural and social-economic effects;
- b. physical effects on the locality, including landscape, amenity and visual effects;
- c. ecosystems, including effects on plants, animals, or habitats, whether aquatic or terrestrial;
- d. natural and physical resources having special significance (for example recreational, cultural, or aesthetic); and
- e. risks to the neighbourhood or environment.

In drafting and reviewing conditions on discharge permits, and in implementing monitoring programmes, the Council is recognising the comprehensive meaning of 'effects' in as much as is appropriate for each

activity. Monitoring programmes are not only based on existing permit conditions, but also on the obligations of the RMA to assess the effects of the exercise of consents. In accordance with Section 35 of the RMA, the Council undertakes compliance monitoring for consents and rules in regional plans, and maintains an overview of the performance of resource users and consent holders. Compliance monitoring, including both activity and impact monitoring, enables the Council to continually re-evaluate its approach and that of consent holders to resource management and, ultimately, through the refinement of methods and considered responsible resource utilisation, to move closer to achieving sustainable development of the region's resources.

1.1.4 Evaluation of environmental performance

Besides discussing the various details of the performance and extent of compliance by the consent holders, this report also assigns a rating as to each Company's environmental and administrative performance during the period under review. The rating categories are high, good, improvement required and poor for both environmental and administrative performance. The interpretations for these ratings are found in Appendix II.

For reference, in the 2021-2022 year, consent holders were found to achieve a high level of environmental performance and compliance for 88% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 10% of the consents, a good level of environmental performance and compliance was achieved.¹

1.2 Process description

1.2.1 Urenui Beach Camp

The Urenui Domain is located on a spit of land at the mouth of the Urenui River and has been a summer recreation ground for more than 100 years. The Domain comprises of a number of permanent baches, boat ramp and campground including campsites, cabins, two visitors ablution blocks, a house for the campground operator and camp store.

The current sewage disposal system has been in use since 1987. Prior to this, septic tank waste was pumped to a nearby cliff top and discharged to the sea below. This was found to be unsatisfactory as the septic tank retention time was about 21 hours during the peak summer usage period, resulting in inadequate treatment of sewage. The current disposal system collects all sewage from various gravity fed sewers and discharges to a single centralised septic tank to the east of the camp site where it receives primary treatment, before being discharged to a pump station (located immediately west of the golf course). It is then transferred to a system of four discharge leach fields approximately 50 m from the edge of the cliff, to the northeast of the camp and golf course.

1.2.2 Onaero Bay Holiday Park

The campground at Onaero has a mixture of campsites and a cabin as well as housing for the campground manager, 16 privately owned baches and a public toilet block.

The current sewage disposal system has been in use since 1984. Prior to this, waste was collected in septic tanks and the overflow gravitated to a small pumping station on the northern side of the Onaero River. The septic tank waste was then pumped to the top of a nearby ridge and into a small soakage pit. This was found to be unsatisfactory during the peak summer period, and resulted in inadequate treatment of sewage.

¹ The Council has used these compliance grading criteria for more than 18 years. They align closely with the 4 compliance grades in the MfE Best Practice Guidelines for Compliance, Monitoring and Enforcement, 2018

The current disposal system treats waste from the campsite in a similar manner to the Urenui Beach Camp's wastewater treatment system. A collection manhole collects all sewage from various gravity fed sewers across the camp and a pump station transfers the wastewater to a leach field to the north of the camp where it is fed to two discharge fields approximately 300 m from site.

1.3 Resource consents

NPDC holds two resource consents, the details of which are summarised in the table below. Summaries of the conditions attached to each permit are set out in Section 3 of this report. Consent renewal applications were submitted by NPDC in February 2021 for both consents, and are still under consideration by the Council. Section 124 of the RMA provides the ability for consent holders to exercise their existing resource consent while applying for a replacement resource consent. Both consents are protected under S.124 in this instance.

A summary of the various consent types issued by the Council is included in Appendix I, as are copies of all permits held by NPDC during the period under review.

Table 1 Resource consents held by NPDC, in relation to treated septic tank effluent discharges into groundwater, at the Urenui Beach Camp and Onaero Bay Holiday Park

Consent number	Purpose	Granted	Review	Expires
<i>Water discharge permits</i>				
2046-3	To discharge treated septic tank sewage effluent via soakage trenches into groundwater in the vicinity of the Urenui River	6 December 2002	June 2015	Expired 1 June 2021 S.124 Protection
1389-3	To discharge treated septic tank effluent via soakage trenches into groundwater in the vicinity of the Onaero River	6 December 2002	June 2015	Expired 1 June 2021 S.124 Protection

1.4 Monitoring programme

Section 35 of the RMA sets obligations upon the Council to gather information, monitor and conduct research on the exercise of resource consents within the Taranaki region. The Council is also required to assess the effects arising from the exercising of these consents and report upon them.

The Council may therefore make and record measurements of physical and chemical parameters, take samples for analysis, carry out surveys and inspections, conduct investigations and seek information from consent holders.

The monitoring programme for the Urenui and Onaero beach camps consisted of three primary components.

1.4.1 Programme liaison and management

There is generally a significant investment of time and resources by the Council in:

- ongoing liaison with resource consent holders over consent conditions and their interpretation and application;
- in discussion over monitoring requirements;
- preparation for any consent reviews, renewals or new consent applications;
- advice on the Council's environmental management strategies and content of regional plans; and

- consultation on associated matters.

1.4.2 Site inspections

The Urenui Beach Camp and Onaero Bay Holiday Park were both visited three times during the monitoring period. With regard to consents for the discharge to water, the main points of interest were plant processes with potential or actual discharges to receiving watercourses. Air inspections focused on site processes with associated actual and potential emission sources and characteristics, including potential odour, dust, noxious or offensive emissions. The neighbourhood was also surveyed for environmental effects. The infiltration trenches for both locations were also inspected during the 2021-2022 monitoring year.

1.4.3 Bacteriological sampling

The Council undertook bacteriological sampling in conjunction with the second site inspections on 10 January 2022. Samples were analysed for temperature, conductivity and the faecal indicator bacteria (FIB) enterococci or *Escherichia coli* (*E. coli*) depending on whether it was freshwater or seawater. The FIB were monitored to provide an indication of potential contamination of the water by animal and/or human excreta. Electrical conductivity, which reflects the total ionic content of water, was measured as a supporting variable; conductivity indirectly relates to water composition as it correlates well with total dissolved solid concentrations (Davies-Colley, 2013).

Water quality at these sites is of particular interest as the beaches and rivers around the Urenui Beach Camp and Onaero Bay Holiday Park are popular summer swimming areas. In 2003, the Ministry for the Environment (MfE) developed the Guidelines for Recreational Water Quality to assess the safety of water for contact recreation. The coastal guidelines focus on enterococci as these bacteria have the ability to survive in marine water, providing the closest correlation with health effects in New Zealand coastal waters, and for freshwater, the guidelines use *E. coli* as the preferred indicator (MfE, 2003). 'Alert' and 'Action' guideline levels are summarised in Table 2 and are based on keeping illness risk associated with recreational use to less than approximately 2%.

Table 2 Recreational bathing guidelines (MfE, 2003)

	Indicator	Mode		
		Surveillance	Alert	Action
Marine	Enterococci (cfu/100 ml)	No single sample >140	Single sample > 140	Two consecutive single samples >280
Freshwater	<i>E. coli</i> (cfu/100 ml)	No single sample >260	Single sample >260	Single sample >550

1.4.3.1 Urenui Beach Camp

Water samples were collected at two river and two coastal sites at Urenui Beach Camp during the 2021-22 monitoring year (Table 3; Figure 1). The bridge on State Highway 3 (Site 1) was previously used as the upstream sampling site. An alternative site, 1 km downstream at the footbridge (Site 1a), has been used since 2001 as Site 1 is no longer safe to sample from.

Table 3 Locations of bacteriological sampling sites at Urenui Beach Camp

Site	Location	Site code	GPS coordinates (NZTM)
1	Upstream Urenui River SH3 bridge	URN000420	1721404 - 5682968
1a	Upstream Urenui River footbridge	URN000440	1720608 - 5682914
2	Urenui River at mouth	URN000480	1720245 - 5683370

Site	Location	Site code	GPS coordinates (NZTM)
3	Sea coast approx. 200 m east of river mouth	SEA900072	1720582 - 5683563
4	Sea coast at east end of beach	SEA900070	1720803 - 5683667



Figure 1 Map of sampling sites and other features of interest at Urenui Beach Camp

In addition to water quality monitoring during inspections, bacteriological samples were also collected from Urenui Beach 200 m east of river mouth (SEA900072) as part of the Council's 'Can I Swim Here' Programme over the summer bathing season (November through March).

1.4.3.2 Onaero Bay Holiday Park

Water samples were collected at two river and three coastal sites at Onaero Bay Holiday Park during the 2021-2022 monitoring year (Table 4; Figure 2).

Table 4 Locations of bacteriological sampling sites at Onaero Bay Holiday Park

Site	Location	Site code	GPS coordinates (NZTM)
1	Onaero River SH3 bridge	ONR000450	1718296 - 5682687
2	Onaero River at domain pump station bridge	ONR000470	1718283 - 5682895
3	Sea coast on beach adjacent to surf club	SEA900085	1718158 - 5683163
4	Sea coast beneath sewage infiltration cliff	SEA900083	1718216 - 5683212
5	Sea coast north of sewage infiltration cliff	SEA900081	1718296 - 5683239



Figure 2 Map of sampling sites and other features of interest at Onaero Bay Holiday Park

In addition to water quality monitoring during inspections, bacteriological samples were also collected from in front of the Onaero Surf Club (SEA900085) as part of the Council's 'Can I Swim Here' Programme over the summer bathing season (November through March).

2 Results

2.1 Urenui Beach Camp

2.1.1 Inspections

Urenui Beach Camp was visited three times during the 2021-2022 monitoring period. During the first inspection on 17 Dec 2021 there was some ponding identified in the area around the pump station after heavy rainfall, but there were no offensive odours detected in this area at this time. The camp manager noted NPDC/Citycare had been working on the pump station and re-lining the sewer pipes and would be back in February to continue this work. There were no other odour or visual issues found during the second and third inspections. Water samples were taken in conjunction with the second inspection on 10 Jan 2022.

The Urenui Beach Camp trenches were inspected separately on 16 Feb 2022 at 0900 NZST. There had been heavy rain prior and the camp reported they had experienced a power cut for 30+ hours, during which NPDC had attended with generators to ensure the wastewater pumps did not overflow. There were no odour or visual issues identified in or around the trenches at the time of the inspection.

2.1.2 Bacteriological sampling

Faecal indicator bacteria have been sampled at the Urenui Beach Camp since 1987. A summary of historical bacteriological results from 1987 to 2021 is provided in Table 5. Median results indicate that FIB levels are typically lower at the river mouth than further upstream, likely due to a mixing effect at the river mouth where seawater containing very low levels of FIB intrudes into the estuarine environment and dilutes the higher FIB counts of the riverine water. This is supported by a higher median electrical conductivity level at the river mouth than at the upstream site, due to the high ionic content and therefore electrical conductivity of seawater. These higher FIB counts are typically not reflected at the coastal sites, where even more mixing and dilution occurs after the river enters the Tasman Sea.

Table 5 Summary of previous bacteriological results at Urenui Beach Camp (1993-2021)

	Upstream Urenui River URN000420/URN000440		Urenui River @ mouth URN000480		200m E of mouth SEA900072		End of beach SEA900070	
	<i>E. coli</i> (MPN/ 100 ml)	EC (mS/m @20°C)	<i>E. coli</i> (MPN/ 100 ml)	EC (mS/m @20°C)	Ent (cfu/ 100 ml)	EC (mS/m @20°C)	Ent (cfu/ 100 ml)	EC (mS/m @20°C)
Number of samples	26	28	26	28	27	26	29	28
Minimum	8	192	4	144	0.5	1560	1	1480
Maximum	3300	4740	2100	4750	250	4750	900	4760
Median	290	1710	150	2785	23	3720	20	4145

The results of the routine bacteriological monitoring undertaken during the 2021-2022 summer monitoring period are presented in Table 6. The *E. coli* counts recorded at both river sampling sites were above the respective historical medians for those sites, and counts were slightly higher at the mouth (URN000480) than at the upstream site (URN000440), but both results were below the MfE 'Action' level for freshwater (Table 2). Enterococci counts at both coastal sampling sites were well below the MfE 'Surveillance' levels for marine waters (Table 2) and similar to historical medians (Table 5).

Table 6 Bacteriological results for Urenui Beach Camp (10 January 2022)

	Upstream Urenui River URN000440		Urenui River @ mouth URN000480		200 m E of mouth SEA900072		End of beach SEA900070	
	<i>E. coli</i> (MPN/ 100 ml)	EC (mS/m @20°C)	<i>E. coli</i> (MPN/ 100 ml)	EC (mS/m @20°C)	Ent (cfu/ 100 ml)	EC (mS/m @20°C)	Ent (cfu/ 100 ml)	EC (mS/m @20°C)
10 Jan 2022	313	2520	397	3570	33	3970	7	4240

2.1.3 Provision of consent holder data

NPDC provided records of effluent volumes discharged to the soakage trenches between 01 July 2021 and 30 June 2022 (Figure 3). During the 2021-2022 monitoring period the Urenui Beach Camp exceeded the consent limit of 85 m³/day on 78 days of the year (21% non-compliance). Many of these events followed periods of high rainfall, and/or aligned with dates of higher occupancy (i.e. holiday periods).

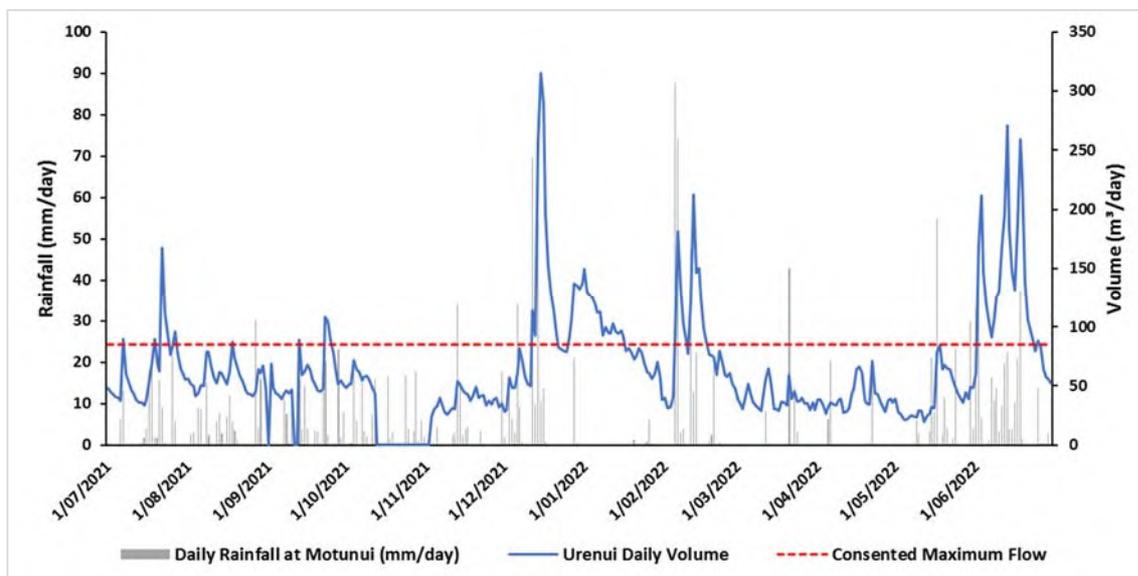


Figure 3 Supplied flow meter data from NPDC for Urenui Beach Camp (01 July 2021 – 30 June 2022)

2.2 Onaero Bay Holiday Park

2.2.1 Inspections

Onaero Bay Holiday Park was visited three times during the monitoring period. During the first inspection on 17 Dec 2021 the camp manager noted an offensive odour from an inspection hole that was not sealed properly near the pump station. The Council alerted NPDC who had this promptly fixed prior to the second inspection on 10 Jan 2022. The camp manager also noted that there had been issues with the pump station after the power cuts, which required NPDC to re-purge the system. There were no other odour or visual issues identified during any of the inspections, but a camp worker did disclose that there had been odour issues near the pump station during their busiest period and at times a thick scum floating on the Onaero River just upstream of the pump station bridge. Water samples were taken in conjunction with the second inspection on 10 Jan 2022, including an additional sample from a small tributary just upstream of the bridge (ONR000469; see Section 2.3).

2.2.2 Bacteriological sampling

FIB have been sampled for at the Onaero Bay Holiday Park since 1987. A summary of historical bacteriological results from 1987 to 2021 is presented in Table 7. Median results indicate that FIB levels and conductivity are typically higher at the bridge below the beach camp's pump station, compared with the upstream sample. These higher FIB counts are typically not reflected at the coastal sites, where extensive mixing and dilution occurs after the river meets the Tasman Sea.

Table 7 Summary of previous bacteriological results at Onaero Bay Holiday Park (1993-2021)

	Onaero River upstream ONR000450		Onaero River downstream ONR000470		Beach, adjacent to surf club SEA000085		Beach, beneath infiltration cliff SEA000083		Beach, north of infiltration cliff SEA000081	
	<i>E. coli</i> (MPN/ 100 ml)	EC (mS/m @20°C)	<i>E. coli</i> (MPN/ 100 ml)	EC (mS/m @20°C)	Ent (cfu/ 100 ml)	EC (mS/m @20°C)	Ent (cfu/ 100 ml)	EC (mS/m @20°C)	Ent (cfu/ 100 ml)	EC (mS/m @20°C)
No. of samples	27	29	28	30	29	28	29	28	25	24
Minimum	77	10	69	11	1	757	3	603	1	2280
Maximum	2420	2000	2420	4680	4000	4740	1900	4710	1100	4840
Median	460	101	602	160	80	4040	40	4310	35	4455

Table 8 shows the results of the bacteriological monitoring undertaken during the 2021-2022 monitoring year. The *E. coli* counts recorded at the upstream site were above the MfE 'Alert' level for freshwater, and the downstream sample was above the MfE 'Action' level (Table 2). Both were similar to their historical medians. Additional samples were taken from a tributary slightly upstream (ONR000469) of the downstream sampling site (ONR000470) which returned high *E. coli* counts and triggered a series of resamples (see Section 2.3). Enterococci counts at the coastal sites were also similar to their respective historical medians, and all were below the MfE 'Surveillance' level for marine waters (Table 2).

Table 8 Bacteriological results for Onaero Bay Holiday Park (10 January 2022)

	Onaero River upstream ONR000450		Onaero River downstream ONR000470		Beach, adjacent to surf club SEA000085		Beach, beneath infiltration cliff SEA000083		Beach, north of infiltration cliff SEA000081	
	<i>E. coli</i> (MPN/ 100 ml)	EC (mS/m @20°C)	<i>E. coli</i> (MPN/ 100 ml)	EC (mS/m @20°C)	Ent (cfu/ 100 ml)	EC (mS/m @20°C)	Ent (cfu/ 100 ml)	EC (mS/m @20°C)	Ent (cfu/ 100 ml)	EC (mS/m @20°C)
10 January 2022	435	243	687	387	34	4810	59	4540	19	5030

2.2.3 Provision of consent holder data

NPDC provided records of effluent volumes discharged to the soakage trenches between 1 July 2021 and 30 June 2022 (Figure 4). During the 2021-2022 monitoring period Onaero Bay Holiday Park exceeded the consent limit of 17 m³/day on 49 days of the year (13% non-compliance). Many of these events followed periods of high rainfall, and/or aligned with dates of higher occupancy (i.e. holiday periods).

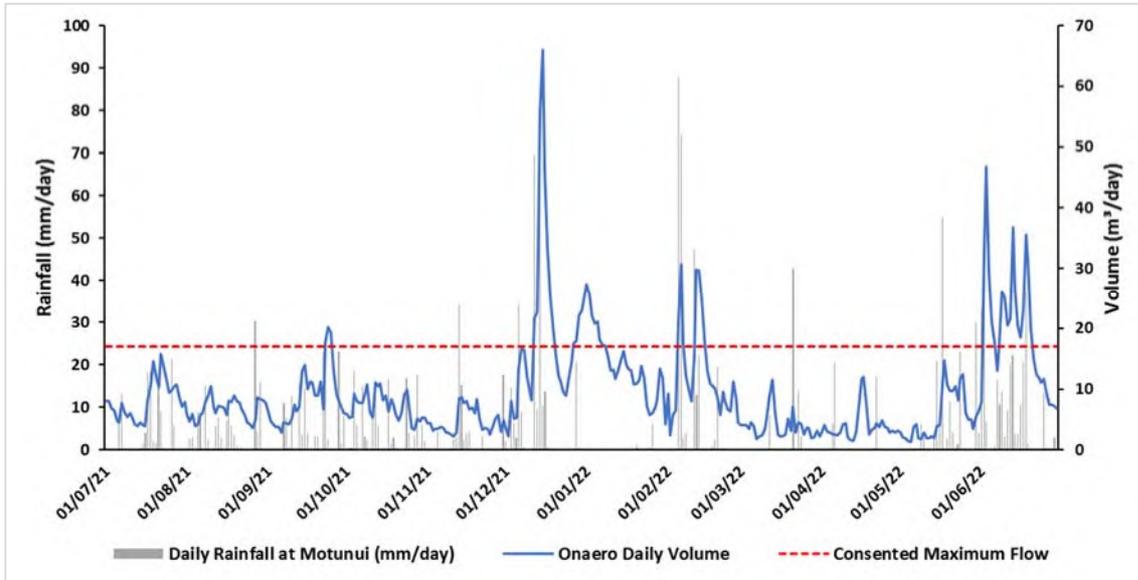


Figure 4 Supplied flow meter data from NPDC for Onaero Bay Holiday Park (1 July 2021– 30 June 2022)

2.3 Incidents, investigations, and interventions

The monitoring programme for the year was based on what was considered to be an appropriate level of monitoring, review of data, and liaison with NPDC. During the year matters may arise which require additional activity by the Council, for example provision of advice and information, or investigation of potential or actual causes of non-compliance or failure to maintain good practices. A pro-active approach, that in the first instance avoids issues occurring, is favoured.

For all significant compliance issues, as well as complaints from the public, the Council maintains a database record. The record includes events where the individual/organisation concerned has itself notified the Council. Details of any investigation and corrective action taken are recorded for non-compliant events.

Complaints may be alleged to be associated with a particular site. If there is potentially an issue of legal liability, the Council must be able to prove by investigation that the identified individual/organisation is indeed the source of the incident (or that the allegation cannot be proven).

NPDC is currently under Abatement Notices EAC-23206 and EAC-23207 for exceeding the consented limits of wastewater effluent volumes discharged to the soakage trenches at both Urenui Beach Camp and Onaero Holiday Park. In 2020, NPDC commissioned an Assessment of Environmental Effects and is planning for an improved system with additional measures such as monitoring of the discharges and receiving environments, reduction of inflow and infiltration, monitoring and limiting occupancy of the campgrounds, improvement to system buffering capacity and investigations into alternative infrastructure for wastewater treatment at both sites. The Abatement Notices have been extended until 30 June 2023 to enable suitable actions to be scoped and implemented, noting that no adverse environmental effects have been detected as a result of the non-compliances. NPDC has been proactive with works on maintenance of their inflow and infiltration pipework, and has reduced the occupancy rate at Onaero Bay Holiday Park from 120 to 90 sites. Consent renewal applications were submitted by NPDC in February 2021 for both consents which address the volume exceedances and ongoing Abatement Notices. These applications are currently sitting with the Council, who are continuing to liaise with NPDC regarding the situation.

During the second site inspection at Onaero Bay Holiday Park on 10 January 2022, the Council was notified that there had been some observations of a thick scum floating on the Onaero River just upstream of the pump station bridge. Additional samples were taken from a small tributary just upstream of the bridge (ONR000469, Figure 5), believed to be the source of the scum, which returned high faecal bacteria counts and triggered a series of resamples by the Council including testing for PCR markers to determine whether human, ruminant, avian or other. The results of the PCR testing determined the counts were not caused by human contamination, and were inconclusive in determining an origin of the source. The Onaero River continued to be monitored closely throughout the remainder of the summer bathing season via the Councils 'Can I Swim Here' recreational water quality monitoring programme.



Figure 5 Location of additional sampling site Onaero trib (ONR000469), upstream of pump station bridge

In the 2021-2022 period, the Council was not required to undertake any other significant additional investigations and interventions, or record incidents, in association with the Company's conditions in resource consents or provisions in Regional Plans.

3 Discussion

3.1.1 Urenui Beach Camp

There were no visual issues or offensive odours noted during any of the three inspections at Urenui Beach Camp, and no issues with the wastewater treatment system were reported during the 2021-2022 monitoring period. Routine bacteriological monitoring recorded *E. coli* counts above the respective historical medians for the freshwater sites, but below the MfE 'Action' level for freshwater. Enterococci counts at both coastal sampling sites were below the MfE 'Surveillance' levels for marine waters and similar to historical medians. During the 2021-2022 monitoring period the Urenui Beach Camp exceeded the consent limit of 85 m³/day on 78 days following periods of high rainfall and/or dates of higher occupancy. NPDC remains under Abatement Notice EAC-23206 for exceeding consented limits of wastewater effluent volumes discharged to soakage trenches

3.1.2 Onaero Bay Holiday Park

There were no issues with the wastewater treatment system reported during the 2021-2022 monitoring period. An offensive odour was reported near the pump station bridge which was quickly fixed by NPDC. There were reports of a thick scum on the river near the pump station bridge, but further investigation by the Council ruled out human contamination as a source. Routine bacteriological monitoring recorded *E. coli* counts at the upstream site above the MfE 'Alert' level for freshwater, and the downstream sample was above the MfE 'Action' level, however both were similar to their historical medians. Enterococci counts at the coastal sites were also similar to their respective historical medians, and all were below the MfE 'Surveillance' level for marine waters. The daily discharge at Onaero Bay Holiday Park exceeded the consent limit of 17 m³/day on 49 days following periods of high rainfall and/or dates of higher occupancy. NPDC remains under Abatement Notice EAC-23207 for exceeding consented limits of wastewater effluent volumes discharged to soakage trenches.

3.2 Environmental effects of exercise of consents

Bacteriological monitoring was undertaken in the Urenui River, Onaero River and adjacent coastal waters during the period under review. The monitoring did not detect any adverse effects caused by the beach camps' wastewater systems during the 2021-2022 monitoring period.

3.3 Evaluation of performance

A tabular summary of the consent holder's compliance record for the year under review is set out in Tables 9-11.

Table 9 Summary of performance for consent 2046-3

Purpose: To discharge up to 85 m³/day of treated septic tank sewage effluent in the vicinity of the Urenui River		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
1. Bacteriological monitoring of Urenui River and coastal foreshore	Sample collection	Yes
2. Consent holder to maintain septic tank system as required	Site inspections, liaison with camp management	Yes

Purpose: To discharge up to 85 m³/day of treated septic tank sewage effluent in the vicinity of the Urenui River		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
3. Records of daily effluent volumes if requested	Flow meter installed in December 2019, with data provided monthly by NPDC	Yes – Records provided but NPDC are currently under Abatement Notice EAC-23206 for exceeding consented limits of wastewater effluent volumes discharged to soakage trenches
4. Contingency plan	NPDC Water & Wastes Incident Response Plan version 10.5, received February 2019	Yes
5. Optional review provision re. environmental effects	No further provisions for review; expired 1 June 2021, new consent being processed	N/A
Overall assessment of consent compliance and environmental performance in respect of this consent Overall assessment of administrative performance in respect of this consent		Improvement required High

N/A = not applicable

Table 10 Summary of performance for consent 1389-3

Purpose: To discharge up to 17 m³/day of treated septic tank sewage effluent in the vicinity of the Onaero River		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
1. Bacteriological monitoring of Onaero River and coastal foreshore	Sample collection	Yes
2. Consent holder to maintain septic tank system as required	Site inspections, liaison with camp management	Yes
3. Records of daily effluent volumes if requested	Flow meter installed in December 2019, with data provided monthly by NPDC	Yes – Records provided but NPDC are currently under Abatement Notice EAC-23207 for exceeding consented limits of wastewater effluent volumes discharged to soakage trenches
4. Contingency plan	NPDC Water & Wastes Incident Response Plan version 10.5, received February 2019	Yes
5. Optional review provision re. environmental effects	No further provisions for review; expires 1 June 2021, new consent being processed	N/A

Purpose: To discharge up to 17 m ³ /day of treated septic tank sewage effluent in the vicinity of the Onaero River		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
Overall assessment of consent compliance and environmental performance in respect of this consent		Improved required High
Overall assessment of administrative performance in respect of this consent		

N/A = not applicable

Table 11 Evaluation of environmental performance by NPDC over time

Year	Consent no	High	Good	Improvement req	Poor
2010-2011	2046	1	-	-	-
	1389	1	-	-	-
2011-2012	2046	1	-	-	-
	1389	1	-	-	-
2012-2014	2046	1	-	-	-
	1389	-	-	1	-
2014-2015	2046	1	-	-	-
	1389	1	-	-	-
2015-2016	2046	1	-	-	-
	1389	1	-	-	-
2016-2017	2046	1	-	-	-
	1389	1	-	-	-
2017-2018	2046	1	-	-	-
	1389	1	-	-	-
2018-2019	2046	-	1	-	-
	1389	1	-	-	-
2019-2020	2046	-	1	-	-
	1389	-	1	-	-
2020-2021	2046	-	-	1	-
	1389	-	-	1	-
2021-2022	2046	-	-	1	-
	1389	-	-	1	-
Total	2046	7	2	2	0
	1389	7	1	3	0

During the monitoring period, NPDC demonstrated an overall level of environmental performance that requires improvement, and a high level of administrative performance with the resource consents for both Urenui Beach Camp (2046-3) and Onaero Bay Holiday Park (1389-3), as defined in Appendix II. This rating

reflects the ongoing exceedances of discharge volume limits from both camps. No adverse effects have been identified in relation to these discharges and NPDC are being pro-active in their efforts to resolve the issues. NPDC demonstrated a high level of administrative performance with resource consents over the same period.

By comparison with previous years, the monitoring indicated environmental performance has remained at a level that requires improvement.

3.4 Recommendations from the 2020-2021 Annual Report

In the 2020-2021 Annual Report, it was recommended:

1. That in the first instance, monitoring of consented activities at Urenui and Onaero in the 2021-2022 year continue at the same level as in 2020-2021.
2. That should there be ongoing issues with environmental or administrative performance in 2021-2022, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.

These recommendations were implemented in full.

3.5 Alterations to monitoring programmes for 2022-2023

In designing and implementing the monitoring programmes for air/water discharges in the region, the Council has taken into account:

- the extent of information already made available through monitoring or other means to date;
- its relevance under the RMA;
- the Council's obligations to monitor consented activities and their effects under the RMA;
- the record of administrative and environmental performances of the consent holder; and
- reporting to the regional community.

The Council also takes into account the scope of assessments required at the time of renewal of permits, and the need to maintain a sound understanding of industrial processes within Taranaki exercising resource consents.

It is proposed that for 2022-2023, the monitoring programme for the Urenui and Onaero Beach Camps monitoring programme remains unchanged.

It should be noted that the proposed programme represents a reasonable and risk-based level of monitoring for the site(s) in question. The Council reserves the right to subsequently adjust the programme from that initially prepared, should the need arise if potential or actual non-compliance is determined at any time during 2022-2023.

4 Recommendations

1. That in the first instance, monitoring of consented activities at Urenui and Onaero in the 2022-2023 year continue at the same level as in 2021-2022.
2. That NPDC continue to make all attempts possible to comply with Abatement Notices EAC-23206 and EAC-23207.
3. That should there be ongoing issues with environmental or administrative performance in 2022-2023, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.

Glossary of common terms and abbreviations

The following abbreviations and terms may be used within this report:

cfu	Colony forming units. A measure of the concentration of bacteria usually expressed as per 100 millilitre sample.
Conductivity	Conductivity, an indication of the level of dissolved salts in a sample, usually measured at 25°C and expressed in mS/m.
Contact recreation	Recreational activities that bring people physically in contact with water, involving a risk of involuntary ingestion or inhalation of water.
<i>E. coli</i>	<i>Escherichia coli</i> , an indicator of the possible presence of faecal material and pathological micro-organisms. Usually expressed as colony forming units per 100 millilitre sample.
Ent	Enterococci, an indicator of the possible presence of faecal material and pathological micro-organisms. Usually expressed as colony forming units per 100 millilitre of sample.
Incident	An event that is alleged or is found to have occurred that may have actual or potential environmental consequences or may involve non-compliance with a consent or rule in a regional plan. Registration of an incident by the Council does not automatically mean such an outcome had actually occurred.
Intervention	Action/s taken by Council to instruct or direct actions be taken to avoid or reduce the likelihood of an incident occurring.
Investigation	Action taken by Council to establish what were the circumstances/events surrounding an incident including any allegations of an incident.
Incident Register	The Incident Register contains a list of events recorded by the Council on the basis that they may have the potential or actual environmental consequences that may represent a breach of a consent or provision in a Regional Plan.
Median	Central value when values are arranged in order of magnitude.
MPN	Most Probable Number. A method used to estimate the concentration of viable microorganisms in a sample.
mS/m	Millisiemens per metre.
Resource consent	Refer Section 87 of the RMA. Resource consents include land use consents (refer Sections 9 and 13 of the RMA), coastal permits (Sections 12, 14 and 15), water permits (Section 14) and discharge permits (Section 15).
RMA	<i>Resource Management Act 1991</i> and including all subsequent amendments.
Water quality	The bacteriological condition of a water body as it relates to human health, measured using indicator bacteria.

For further information on analytical methods, contact an Environmental Quality Manager.

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Appendix I

Resource consents held by New Plymouth District Council

(For a copy of the signed resource consent
please contact the TRC Consents department)

Water abstraction permits

Section 14 of the RMA stipulates that no person may take, use, dam or divert any water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or it falls within some particular categories set out in Section 14. Permits authorising the abstraction of water are issued by the Council under Section 87(d) of the RMA.

Water discharge permits

Section 15(1)(a) of the RMA stipulates that no person may discharge any contaminant into water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or by national regulations. Permits authorising discharges to water are issued by the Council under Section 87(e) of the RMA.

Air discharge permits

Section 15(1)(c) of the RMA stipulates that no person may discharge any contaminant from any industrial or trade premises into air, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Permits authorising discharges to air are issued by the Council under Section 87(e) of the RMA.

Discharges of wastes to land

Sections 15(1)(b) and (d) of the RMA stipulate that no person may discharge any contaminant onto land if it may then enter water, or from any industrial or trade premises onto land under any circumstances, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Permits authorising the discharge of wastes to land are issued by the Council under Section 87(e) of the RMA.

Land use permits

Section 13(1)(a) of the RMA stipulates that no person may in relation to the bed of any lake or river use, erect, reconstruct, place, alter, extend, remove, or demolish any structure or part of any structure in, on, under, or over the bed, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Land use permits are issued by the Council under Section 87(a) of the RMA.

Coastal permits

Section 12(1)(b) of the RMA stipulates that no person may erect, reconstruct, place, alter, extend, remove, or demolish any structure that is fixed in, on, under, or over any foreshore or seabed, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Coastal permits are issued by the Council under Section 87(c) of the RMA.

Discharge Permit
Pursuant to the Resource Management Act 1991
a resource consent is hereby granted by the
Taranaki Regional Council

Name of
Consent Holder: New Plymouth District Council
Private Bag 2025
NEW PLYMOUTH

Consent Granted
Date: 6 December 2002

Conditions of Consent

Consent Granted: To discharge up to 17 cubic metres/day of treated septic tank sewage effluent via soakage trenches into groundwater in the vicinity of the Onaero River at or about GR: Q19:284-448

Expiry Date: 1 June 2021

Review Date(s): June 2009, June 2015

Site Location: Onaero Bay Motor Camp, State Highway 3, Onaero

Legal Description: Sec 82 Urenui Dist Blk III Waitara SD Kaipikari Farm Sett
Rec Res

Catchment: Onaero

Consent 1389-3

General conditions

- a) On receipt of a requirement from the Chief Executive, Taranaki Regional Council (hereinafter the Chief Executive), the consent holder shall, within the time specified in the requirement, supply the information required relating to the exercise of this consent.
- b) Unless it is otherwise specified in the conditions of this consent, compliance with any monitoring requirement imposed by this consent must be at the consent holder's own expense.
- c) The consent holder shall pay to the Council all required administrative charges fixed by the Council pursuant to section 36 in relation to:
 - i) the administration, monitoring and supervision of this consent; and
 - ii) charges authorised by regulations.

Special conditions

1. The consent holder shall, in conjunction with the Taranaki Regional Council, undertake such bacteriological monitoring of the Onaero River and coastal waters of the foreshore as deemed necessary by the Chief Executive, Taranaki Regional Council.
2. The consent holder shall ensure proper maintenance of the septic tanks, pumping station and soakage trenches as required.
3. The consent holder shall provide records of daily effluent volumes discharged to the soakage trenches at the request of the Chief Executive, Taranaki Regional Council.
4. The consent holder shall provide a contingency plan to the satisfaction of the Chief Executive, Taranaki Regional Council, outlining measures to be undertaken in the event of power failure, pump breakdown, pipe blockage and failure of soakage trenches, within three months of granting this consent.
5. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2009 and/or June 2015, for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Signed at Stratford on 6 December 2002

For and on behalf of
Taranaki Regional Council

Director-Resource Management

Discharge Permit
Pursuant to the Resource Management Act 1991
a resource consent is hereby granted by the
Taranaki Regional Council

Name of
Consent Holder: New Plymouth District Council
Private Bag 2025
NEW PLYMOUTH

Consent Granted
Date: 6 December 2002

Conditions of Consent

Consent Granted: To discharge up to 85 cubic metres/day of treated septic
tank sewage effluent via soakage trenches into
groundwater in the vicinity of the Urenui River at or about
GR: Q19:310-452

Expiry Date: 1 June 2021

Review Date(s): June 2009, June 2015

Site Location: Urenui Beach Motor Camp, Beach Road, Urenui

Legal Description: Lot 1 DP 15787 Blk III Waitara SD

Catchment: Urenui

Consent 2046-3

General conditions

- a) On receipt of a requirement from the Chief Executive, Taranaki Regional Council (hereinafter the Chief Executive), the consent holder shall, within the time specified in the requirement, supply the information required relating to the exercise of this consent.
- b) Unless it is otherwise specified in the conditions of this consent, compliance with any monitoring requirement imposed by this consent must be at the consent holder's own expense.
- c) The consent holder shall pay to the Council all required administrative charges fixed by the Council pursuant to section 36 in relation to:
 - i) the administration, monitoring and supervision of this consent; and
 - ii) charges authorised by regulations.

Special conditions

1. The consent holder shall, in conjunction with the Taranaki Regional Council, undertake such bacteriological monitoring of the Urenui River and coastal waters of the foreshore as deemed necessary by the Chief Executive, Taranaki Regional Council.
2. The consent holder shall ensure proper maintenance of the septic tanks, pumping station and soakage trenches as required.
3. The consent holder shall provide records of daily effluent volumes discharged to the soakage trenches at the request of the Chief Executive, Taranaki Regional Council.
4. The consent holder shall provide a contingency plan to the satisfaction of the Chief Executive, Taranaki Regional Council, outlining measures to be undertaken in the event of power failure, pump breakdown, pipe blockage and failure of soakage trenches, within three months of granting this consent.
5. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2009 and/or June 2015, for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Signed at Stratford on 6 December 2002

For and on behalf of
Taranaki Regional Council

Director-Resource Management

Appendix II

Categories used to evaluate environmental and administrative performance

Categories used to evaluate environmental and administrative performance

Environmental performance is concerned with actual or likely effects on the receiving environment from the activities during the monitoring year. Administrative performance is concerned with the Company's approach to demonstrating consent compliance in site operations and management including the timely provision of information to Council (such as contingency plans and water take data) in accordance with consent conditions.

Events that were beyond the control of the consent holder and unforeseeable (that is a defence under the provisions of the RMA can be established) may be excluded with regard to the performance rating applied. For example loss of data due to a flood destroying deployed field equipment.

The categories used by the Council for this monitoring period, and their interpretation, are as follows:

Environmental Performance

High: No or inconsequential (short-term duration, less than minor in severity) breaches of consent or regional plan parameters resulting from the activity; no adverse effects of significance noted or likely in the receiving environment. The Council did not record any verified unauthorised incidents involving environmental impacts and was not obliged to issue any abatement notices or infringement notices in relation to such impacts.

Good: Likely or actual adverse effects of activities on the receiving environment were negligible or minor at most. There were some such issues noted during monitoring, from self-reports, or during investigations of incidents reported to the Council by a third party but these items were not critical, and follow-up inspections showed they have been dealt with. These minor issues were resolved positively, co-operatively, and quickly. The Council was not obliged to issue any abatement notices or infringement notices in relation to the minor non-compliant effects; however abatement notices may have been issued to mitigate an identified potential for an environmental effect to occur.

For example:

- High suspended solid values recorded in discharge samples, however the discharge was to land or to receiving waters that were in high flow at the time;
- Strong odour beyond boundary but no residential properties or other recipient nearby.

Improvement required: Likely or actual adverse effects of activities on the receiving environment were more than minor, but not substantial. There were some issues noted during monitoring, from self-reports, or during investigations of incidents reported to the Council by a third party. Cumulative adverse effects of a persistent minor non-compliant activity could elevate a minor issue to this level. Abatement notices and infringement notices may have been issued in respect of effects.

Poor: Likely or actual adverse effects of activities on the receiving environment were significant. There were some items noted during monitoring, from self-reports, or during investigations of incidents reported to the Council by a third party. Cumulative adverse effects of a persistent moderate non-compliant activity could elevate an 'improvement required' issue to this level. Typically there were grounds for either a prosecution or an infringement notice in respect of effects.

Administrative performance

High: The administrative requirements of the resource consents were met, or any failure to do this had trivial consequences and were addressed promptly and co-operatively.

Good: Perhaps some administrative requirements of the resource consents were not met at a particular time, however this was addressed without repeated interventions from the Council staff. Alternatively

adequate reason was provided for matters such as the no or late provision of information, interpretation of 'best practical option' for avoiding potential effects, etc.

Improvement required: Repeated interventions to meet the administrative requirements of the resource consents were made by Council staff. These matters took some time to resolve, or remained unresolved at the end of the period under review. The Council may have issued an abatement notice to attain compliance.

Poor: Material failings to meet the administrative requirements of the resource consents. Significant intervention by the Council was required. Typically there were grounds for an infringement notice.