



TE RŪNANGA O NGĀTI AWA

6644/RMT

10 December 2013

Attention: Inka Krawczyk (Project Manager)

Whakatane District Council
Private Bag 1002
WHAKATANE 3158

MATATA WASTEWATER RETICULATION SCHEME & DISPOSAL FIELD – NGATI AWA FINAL CULTURAL IMPACT ASSESSMENT

The following correspondence is in response to your request for Te Runanga o Ngati Awa (TRoNA) to prepare a final cultural impact assessment for the proposed Matata wastewater reticulation scheme, treatment options and disposal field. This final assessment follows initial and interim cultural impact assessments issued by TRoNA on 17 May and 7 October 2013. TRoNA reserves the right to provide further comment on the proposal by way of formal submission to Regional Consent Application Number 67708 for the Matata Wastewater proposal. Additional correspondence received has included the following;

- Matata Wastewater Scheme – Waste Water Land Application Groundwater Assessment, Report Prepared for Whakatane District Council by URS New Zealand Limited, dated 1 November 2013;
- Matata Wastewater Scheme – Receiving Environment Water Quality, Ecological and Public Health Risk Assessment, Report Prepared for Whakatane District Council by URS New Zealand Limited, dated 1 November 2013;
- Cultural Impact Assessment of the Proposed Matata Wastewater Scheme (Final), received by email 3 December 2013;

Details of Ngati Awa cultural sites of significance including Wahi Tapu, statutory acknowledgements and land interests have been provided within the interim cultural impact assessments issued by TRoNA on 17 May and 7 October 2013.

MEETINGS

TRoNA attended meetings with Whakatane District Council representatives on Friday 15th November and Monday 2nd December 2013. The meetings were held to discuss cultural issues arising from the proposal and involved representatives of Te Runanga o Ngati Awa, Te Mana o Ngati Rangitahi and the Ngati Tuwharetoa BOP Settlement Trust. As a result of these meetings the following was agreed by TRoNA;

- The “Accidental Discovery Protocol for Earthworks Activities Undertaken in the Construction of the Matata Wastewater Scheme” is accepted by TRoNA as appropriate;

HE MANU HOU AHAU HE KOHANGA I REREA

- In regard to the appointment of Taonga Tuturu monitors for construction works, nga hapu o Ngati Awa Ngati Hikakino, Te Tawera and Ngai Te Rangihouhiri II will be meeting on 14th and 15th December 2013 and will consider the proposed appointment of Erin Tioke and Beverly Hughes. TRONA will notify Whakatane District Council of the outcome of this meeting;
- TRONA supports the identification of Otaramuturangi as an appropriate destination for any koiwi;
- TRONA supports the proposed Training Workshop (1/2 day) as an appropriate occasion to acknowledge commencement of works towards the Matata Wastewater Scheme and potentially undertake pre works karakia. TRONA accepts the offer to invite Ngati Awa Kaumatua and Pukenga to attend.
- TRONA requests that the Accidental Discovery Protocol is made a requirement of any consent granted for the Matata Wastewater Scheme.

RECOMMENDATIONS

Te Runanga o Ngati Awa (TRONA) generally supports the overall approach to the collection, treatment and disposal of wastewater from a reticulated sewage scheme in Matata proposed by Whakatane District Council. TRONA is aware that Matata Township's current reliance on individual on site effluent systems to dispose of wastewater is negatively affecting water quality and cannot be relied upon in the future. Ngati Awa supports the appropriate disposal of treated wastewater to land in circumstances where land disposal will not result in the discharge of contaminants to adjacent waterways or the open coast. TRONA reserves the right to provide further comment on the proposal by way of formal submission to Regional Consent Application Number 67708 for the Matata Wastewater proposal. While Ngati Awa provides general support for the proposal, we seek confirmation of the following matters;

- That Whakatane District Council ensures secure containment and ongoing management of the collection system and transfer pipeline and that effective responses to possible breach or failure are requirements of any consent granted;
- That Whakatane District Council ensures that the level of treatment of wastewater and the effectiveness of proposed land disposal is sufficient to ensure that there is no risk of contamination of ground and surface water or the open coast.
- In this regard, Ngati Awa requests that ongoing monitoring of water quality of the adjacent Orini and shellfish along the open coast be required by way of conditions of consent. In order for any monitoring to be useful, Ngati Awa considers that water quality within the Orini and shellfish at the adjacent open coast should be sampled no less than quarterly (4 times per annum) to account for seasonal variations. On this matter TRONA notes that the monitoring period for groundwater modelling undertaken by URS only took place between 13 September 2013 and 18 October 2013 with large fluctuations around rainfall events. TRONA is concerned that the monitoring undertaken did not account for seasonal periods of high groundwater.
- TRONA does not agree that ongoing monitoring of the impacts of proposed land disposal is appropriate as an advisory note to any consent granted. TRONA expects that any ground or surface water contamination issues that may arise over the lifetime of the scheme will require appropriate management responses that can only be required by conditions of consent.
- TRONA requests that any consent granted for the Matata Wastewater Scheme include requirements for ongoing monitoring of ground and surface water quality and shellfish at the adjacent open coast, and include management responses in the event inappropriate levels of contamination are measured.

- That Regional Council completes a detailed peer review of all technical information and reports provided by Whakatane District Council for the proposal and provide a copy of the findings of that peer review to TRONA.

As previously advised, TRONA had considered the provision of controlled vehicle access to the currently land locked Ngati Awa property Te Toangapoto as appropriate mitigation for the locating of the proposed land disposal area on neighbouring Whakatane District Council reserve land. TRONA is disappointed that negotiations with the neighbouring land owner has failed to secure such access for Ngati Awa. TRONA seeks a commitment by Whakatane District Council to rectify existing private property issues with regard to the informal sand road that provides vehicle access along the eastern bank of the Tarawera River to the river mouth which is the preferred long term option for access to Te Toangapoto.

This correspondence was prepared by Ray Thompson, Portfolio Manager Environment, Te Runanga o Ngati Awa. If you have any queries, please contact the undersigned.

Naku noa, na



Ray Thompson
**ENVIRONMENTAL KAITIAKI TE RUNANGA O NGATI AWA
FOR CHIEF EXECUTIVE**

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