

Urenui and Onaero Beach Camps

Monitoring Programme

Annual Report

2020-2021

Technical Report 2021-26



Working with people | caring for Taranaki



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 2020 to June 2021 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 improvement required level of environmental performance.

NPDC holds one resource consent per beach camp, and each include a total of five special 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. One of these inspections included bacteriological sampling of four sites at Urenui Beach Camp, and five sites at Onaero Bay Holiday Park.

The bacteriological monitoring did not detect any adverse effects caused by the beach camps' wastewater systems during the 2020-2021 monitoring period. Although high enterococci counts were found at a coastal site at Urenui, additional sampling as part of the Council's Bathing Beach Recreational Water Quality monitoring programme returned results well under the 'Alert' level for marine waters.

Exceedances of currently consented discharge limits continued to occur from both camps during the period under review. NPDC remain under abatement notice at both camps to comply with their consent conditions. Exceedances of discharge limits occur intermittently as a result of high rainfall and groundwater infiltration into the wastewater networks. Exceedances during peak holiday periods are also influenced by higher camp occupancy and the increased wastewater volumes generated. Both consents are currently in the process of being renewed. Solutions to the current issues are being investigated through the renewal process. Cultural impact assessments are also being prepared by local iwi. The abatement notices have been extended until 31 March 2022 to enable continuation of this work alongside the consent processing. Monitoring has shown that there have been no adverse effects on the coastal environment in relation to the unauthorised incidents.

During the year under review, NPDC demonstrated a level of environmental performance with the resource consents for Urenui Beach Camp (2046-3) and Onaero Bay Holiday Park (1389-3) that requires improvement. This rating was influenced by 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 proactive in their efforts to resolve the issues. NPDC demonstrated a high level of administrative performance with resource consents over the same period.

For reference, in the 2020-2021 year, consent holders were found to achieve a high level of environmental performance and compliance for 86% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 11% 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 has declined in the year under review.

This report includes recommendations for the 2021-2022 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 2020 to June 2021 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 31st 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 2021-2022 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 and administrative performance

Besides discussing the various details of the performance and extent of compliance by the Company, this report also assigns them a rating for their environmental and administrative performance during the period under review.

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.

For reference, in the 2020-2021 year, consent holders were found to achieve a high level of environmental performance and compliance for 86% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 11% 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 campground at Urenui has a mixture of campsites, cabins and permanent baches, as well as a house for the campground operator, two visitors' ablution blocks, a camp store and boat ramp

The current sewage disposal system at Urenui Beach Camp 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 sewers and discharges to a single centralized 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) and then being 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.

¹ The Council has used these compliance grading criteria for more than 17 years. They align closely with the 4 compliance grades in the MfE Best Practice Guidelines for Compliance, Monitoring and Enforcement, 2018

The current sewage disposal system at the Onaero Bay Holiday Park 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 soakage pit (approximately 4x2x3 m). This was found to be unsatisfactory during the peak summer period, and resulted in inadequate treatment of sewage. The current disposal system at Onaero 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 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.

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	1 June 2021
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	1 June 2021

1.4 Monitoring programme

1.4.1 Introduction

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.

1.4.2 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.

1.4.3 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 surveyed for environmental effects.

1.4.4 Bacteriological sampling

The Council undertook bacteriological sampling in conjunction with the second inspections in January 2021. 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 (see next paragraph). 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

1.4.4.1 Urenui Beach Camp

Water samples were collected at four sites at Urenui Beach Camp: two river and two coastal sites (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 during 2020-2021

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
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

1.4.4.2 Onaero Bay Holiday Park

Water samples were collected at five routinely monitored sites in conjunction with the Onaero Bay Holiday Park, two river and three coastal sites (Table 4; Figure 2).

Table 4 Locations of bacteriological sampling sites at Onaero Bay Holiday Park during 2020-2021

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 State of Environment Monitoring Programme during the 2020-2021 monitoring period.

2 Results

2.1 Urenui Beach Camp

2.1.1 Inspections

11 December 2020

The camp appeared to be relatively quiet at the time of inspection. The camp manager noted that Citycare contractors had been out most days working in the campground area.

There were no reported problems with the wastewater system, and no odour or visual problems were noted at the pump station. The soakage trenches were not inspected on this occasion.

Overall, the camp appeared to be operating in compliance with their consent conditions.

6 January 2021

The camp had approximately 370 people staying, with between 200-300 people staying in the baches, and a large number of day visitors as well.

The camp's wastewater treatment system had been operating without issue over summer and had been regularly maintained.

Water samples were collected on this occasion.

Overall, the camp appeared to be operating in compliance with their consent conditions.

4 February 2021

The camp was moderately booked at time of inspection with approximately 200 people staying. The camp had been fully booked from New Year's Eve through to 31 January 2021.

The camp manager reported no problems with the wastewater system, and no odour or visual problems were noted at the pump station. The soakage trenches were not inspected on this occasion.

Overall, the camp appeared to be operating in compliance with their consent conditions.

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 2020 is provided in Table 5. Median results indicate that FIB levels are typically lower at the river mouth than further upstream. This is 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.

The results of the routine bacteriological monitoring undertaken during the 2020-2021 summer monitoring period are presented in Table 6. The *E. coli* counts recorded at both river sampling sites were below the respective historical medians for those sites, and below the MfE 'Action' level for freshwater (Table 2).

Enterococci counts at both coastal sites were higher than their historical medians, and the coastal site 200m E of the mouth of the Urenui River was on the border of MfE 'Surveillance' and 'Alert' levels for marine waters (Table 2). Additional sampling between Nov 2020 and March 2021 carried out as part of the Council's Bathing Beach Recreational Water Quality monitoring programme returned bacteriological counts more typical of historical results at the site, and were all lower than the 'Alert' level for marine waters.

Table 5 Summary of previous bacteriological results at Urenui Beach Camp (1993-2020)

	Upstream Urenui River URN000420/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)
Number of samples	24	27	25	27	27	26	28	27
Minimum	8	192	4	144	<1	1,560	1	1,480
Maximum	3,300	4,740	2,100	4,750	250	4,750	900	4,760
Median	290	1,710	180	2,860	23	3,720	20	4,160

Table 6 Bacteriological results for Urenui Beach Camp (6 January 2021)

	Upstream Urenui River URN000420/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)
6 Jan 2021	61	1,376	85	1,660	140	2,660	70	3,760

2.1.3 Provision of consent holder data

A flow meter within the wastewater treatment system was installed by NPDC in December 2019 at Urenui Beach Camp, in order to comply with condition 3 of consent 2046-3. NPDC provided records of effluent volumes discharged to the soakage trenches between 01 July 2020 and 30 June 2021 (Figure 3). During the 2020-2021 monitoring period the Urenui Beach Camp exceeded the consent limit of 85 m³/day on 87 days of the year (24% non-compliance). Many of these events followed periods of high rainfall, and/or aligned with dates of higher occupancy (i.e. holiday periods).

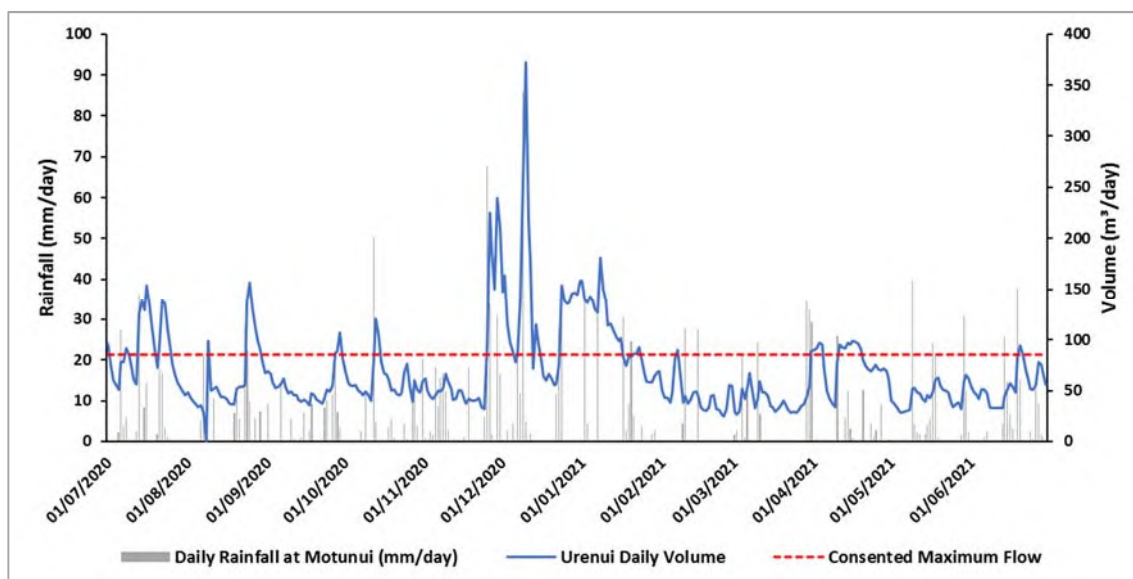


Figure 3 Supplied flow meter data from NPDC for Urenui Beach Camp (July 2020 – June 2021)

2.2 Onaero Bay Holiday Park

2.2.1 Inspections

11 December 2020

The camp appeared quiet at the time of inspection. The new camp manager noted that Citycare and other contractors had been out most days doing work in the campground area.

No odours or visual issues were noted at the pump station or soakage trenches during the inspection.

Overall, the camp appeared to be operating in compliance with their consent conditions.

6 January 2021

A camp staff member was present at the time of the inspection and reported that there was approximately 100 campers present, and that there had been a lot of day visitors as well.

It was reported that there had been odour issues around the bridge and pump station. The soakage trench area looked to be well maintained.

Water samples were collected on this occasion.

Overall, the camp appeared to be operating in compliance with their consent conditions.

4 February 2021

The camp appeared quiet at the time of inspection with two campers and some others in the permanent caravans and batches.

No odours or visual issues were noted at the pump station or soakage trenches during the inspection.

Overall, the camp appeared to be operating in compliance with their consent conditions.

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 2020 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 (1993-2020)

	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	26	28	27	29	28	27	28	27	24	23
Minimum	77	10	69	11	1	757	3	603	1	2,280
Maximum	2,420	2,000	2,420	4,680	4,000	4,740	1,900	4,710	1,100	4,840
Median	454	104	590	142	79	4,130	40	4,340	33	4,450

Table 8 shows the results of the bacteriological monitoring undertaken during the 2020-2021 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). Enterococci counts at the coastal sites were all higher than their historical medians, but below the MfE 'Alert' level for marine waters (Table 2).

Table 8 Bacteriological results for Onaero Bay Holiday Park (6 January 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)
6 January 2021	548	86.7	613	187.7	100	1,611	100	2,280	100	4,480

2.2.3 Provision of consent holder data

A flow meter within the wastewater treatment system was installed by NPDC in December 2019 at Onaero Bay Holiday Park, in order to comply with condition 3 of consent 1389-3. NPDC provided records of effluent volumes discharged to the soakage trenches between 1 July 2020 and 30 June 2021 (Figure 4). During the 2020-2021 monitoring period Onaero Bay Holiday Park exceeded the consent limit of 17 m³/day on 54 days of the year (15% non-compliance). Many of these events followed periods of high rainfall, and/or aligned with dates of higher occupancy (i.e. holiday periods).

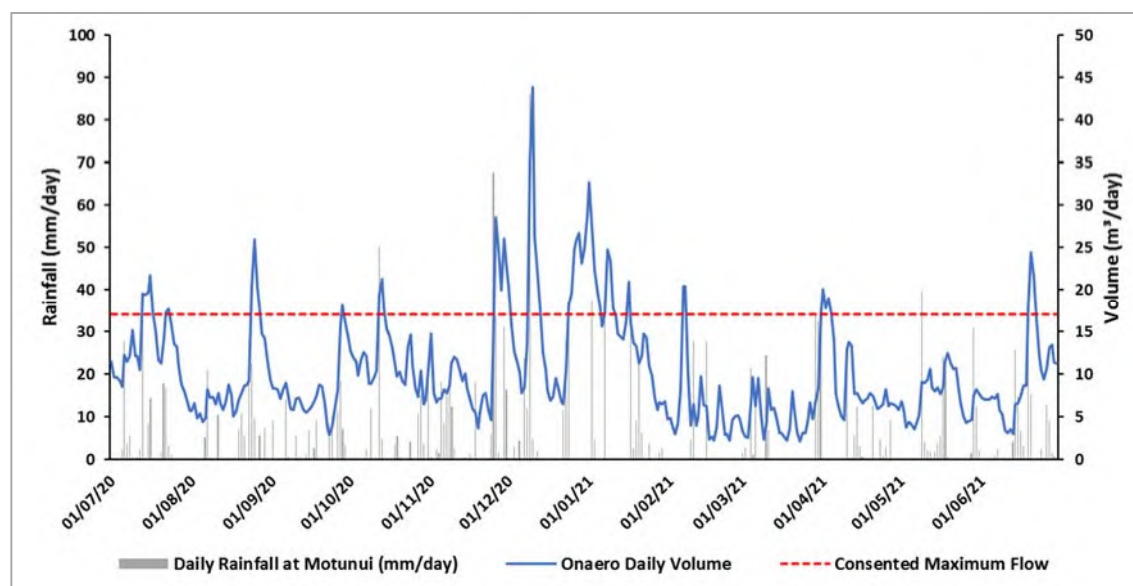


Figure 4 Supplied flow meter data from NPDC for Onaero Bay Holiday Park (July 2020 – June 2021)

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).

Self-notification data received from flow meters at Urenui and Onaero showed that on multiple occasions, treated septic tank sewage effluent was discharged to groundwater in excess of the consented limits. 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 EAC-23206 and EAC-23207 have been extended until 31 March 2022 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. The Council is continuing to liaise closely with NPDC regarding the situation.

In the 2020-2021 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 Discussion of site performance

3.1.1 Urenui Beach Camp

No visual issues or offensive odours were noted during any of the three inspections, and no issues with the wastewater treatment system were reported during the 2020-2021 monitoring period.

Enterococci counts at both coastal sites were higher than their historical medians, and 200 m E of the Urenui River mouth was on the threshold between MfE 'Surveillance' and 'Alert' levels, however additional sampling as part of the Council's Bathing Beach Recreational Water Quality monitoring programme returned results well under the 'Alert' level for marine waters.

The daily discharge at Urenui Beach Camp exceeded the consent limit of 85 m³/day on 87 days of the 2020-2021 monitoring year (24% non-compliance). Many of these exceedances were following periods of high rainfall, and/or align with dates of higher occupancy (i.e. holiday periods).

3.1.2 Onaero Bay Holiday Park

No issues with the wastewater treatment system were reported during the 2020-2021 monitoring period, however there were found to be odour issues around the bridge and pump station during the January inspection.

E. Coli counts in the Onaero River were slightly higher than historical medians, and the downstream sample was above the threshold for the MfE 'Action' level (Table 2). Enterococci counts at the coastal sites were also higher than their historical medians, but well below MfE 'Alert' levels. Overall, there was no clear indication from the monitoring results to suggest that the camp's wastewater system was affecting water quality at the river or the coast.

The daily discharge at Onaero Bay Holiday Park exceeded the consent limit of 17 m³/day on 54 days of the 2020-2021 monitoring year (15% non-compliance). Many of these exceedances were following periods of high rainfall, and/or align with dates of higher occupancy (i.e. holiday periods), however this is still of concern and does need to be addressed (as per Abatement Notice EAC-23207).

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 2020-2021 monitoring period.

NPDC remains under abatement notices to comply with the conditions of both discharge consents. The timeframe on the abatement notices has been extended until 31 March 2022 to allow time for further investigations and works to be carried out on both systems. NPDC has commissioned LOWE Environmental Impact (LEI) to investigate the environmental impacts of the wastewater system and they have recommended additional measures should be included in a management plan to ensure compliance, including 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 (LEI, 2020). Monitoring bores have been drilled around both leach fields, and the effluent and groundwater quality analysed monthly. Groundwater levels are now also being monitored (NPDC, pers. comm., July 16, 2021).

3.3 Evaluation of performance

A tabular summary of the consent holder's compliance record for the year under review is set out in Table 9 and Table 10.

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
3. Records of daily effluent volumes if requested	Flow meter installed in December 2019, with data provided monthly by NPDC	Yes
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		Improvement required High
Overall assessment of administrative performance in respect of this consent		

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
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
Overall assessment of consent compliance and environmental performance in respect of this consent		Improvement 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	-
Total	2046	7	2	1	0
	1389	7	1	2	0

During the year under review, NPDC demonstrated a level of environmental performance with the resource consents for Urenui Beach Camp (2046-3) and Onaero Bay Holiday Park (1389-3) that requires improvement. This rating was influenced by 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 proactive 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 declined during the period under review.

3.4 Recommendations from the 2019-2020 Annual Report

In the 2019-2020 Annual Report, it was recommended:

1. THAT monitoring of consented activities at the beach camps in the 2020-2021 year continue at the same level as in 2019-2020.
2. THAT should there be issues with environmental or administrative performance in 2020-2021, 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 2021-2022

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 2021-2022, 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 2021-2022.

4 Recommendations

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.

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 a Science Services 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