

**Wai-iti Beach Retreat  
Monitoring Programme  
Annual Report  
2023/24  
Technical Report 2024-08**





# **Wai-iti Beach Retreat**

## **Monitoring Programme**

### **Annual Report**

#### **2023/24**

#### **Technical Report 2024-08**

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## Executive summary

Wai-iti Motor Camp Ltd (the Company) operates the Wai-iti Beach Retreat (the Retreat), located on Beach Road in North Taranaki. The camp ground has a septic tank, which discharges to land and a boulder rip rap wall along the foreshore.

This report for the period July 2023 to June 2024 describes the monitoring programme implemented by Taranaki Regional Council (the Council) to assess the Company'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 Company's activities.

**During the monitoring period, Wai-iti Beach Retreat demonstrated a high level of environmental performance and a good level of administrative performance.**

The Company holds two resource consents, which allow it to discharge treated septic tank effluent, and for a boulder rip rap toe protection in the coastal marine area. These consents include a total of 18 conditions setting out the requirements that the Company must satisfy.

The Council's monitoring programme for the year under review included three routine inspections of the wastewater system, one inspection of the rock wall, routine bacteriological water sampling of the Wai-iti Stream and the seawater at Wai-iti Beach and the addition of groundwater sampling.

The monitoring showed that the Retreat was well maintained during the period under review. Freshwater bacteriological sampling results showed high faecal bacteria indicator counts across all sites, however it is concluded that these results could not be attributed to the wastewater treatment system alone. Coastal and groundwater sampling suggested that the Retreat did not adversely impact the quality of local groundwater and coastal environments. There were no unauthorised incident/s recording non-compliance in respect of this consent holder during the period under review.

The Council continues to work with the Company to ensure that data collected and provided to Council is suitable for auditing, as required by the conditions of the replacement wastewater discharge consent granted in September 2022.

For reference, in the 2023/24 year, consent holders were found to achieve a high level of environmental performance and compliance for 864 (89%) of a total of 967 consents monitored through the Taranaki tailored monitoring programmes, while for another 75 (8%) of the consents a good level of environmental performance and compliance was achieved. A further 26 (3%) of consents monitored required improvement in their performance, while the remaining two (<1%) achieved a rating of poor.

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 high level in the year under review.

This report includes recommendations for the 2024/25 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 2023 to June 2024 by Taranaki Regional Council (the Council) describing the monitoring programme associated with resource consents held by Wai-iti Motor Camp Ltd (the Company). The Company operates the Wai-iti Beach Retreat (the Retreat) situated on Beach Road in North Taranaki (Photo 1).

The report includes the results and findings of the monitoring programme implemented by the Council in respect of the consents held by the Company that relate to the discharge of treated sewage effluent, and a boulder rip rap wall along the foreshore within the Wai-iti catchment. This report is the 35<sup>th</sup> annual report to be prepared by the Council to cover the Company's land discharges and their effects.



Photo 1 View of the beach from Wai-iti Beach Retreat

### 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 the Wai-iti Motor Camp Ltd in the Wai-iti catchment;
- the nature of the monitoring programme in place for the period under review; and
- a description of the activities and operations conducted in the Company's site/catchment.

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 2024/25 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 2023/24 year, consent holders were found to achieve a high level of environmental performance and compliance for 864 (89%) of a total of 967 consents monitored through the Taranaki tailored monitoring programmes, while for another 75 (8%) of the consents a good level of environmental

performance and compliance was achieved. A further 26 (3%) of consents monitored required improvement in their performance, while the remaining two (<1%) achieved a rating of poor.<sup>1</sup>

## 1.2 Process description

All wastewaters from the camping ground enter a septic tank of 143m<sup>3</sup> capacity. The effluent is then pumped via a 50mm alkathene pipe across the Wai-iti Stream and into soakage trenches situated on a wooded hillside approximately 30m from the stream. When previous proprietors took over the property in 1986-1987, the disposal system consisted of a seepage ditch situated near the base of the wooded hillside. Monitoring found that this trench system was an unsuitable means of disposal, resulting in high faecal coliform counts at the mouth of the Wai-iti Stream. This inadequate treatment led to the development of the new multiple soakage trench system on the hillside which was commissioned in 1991. More recently this has been extended, and another soakage field has been created in the Olive Grove on the other side of the hillside to allow the Retreat to spread the load across a wider area.

### 1.2.1 Rock wall

The current consent (6462-2.0) provides for the occupation of the coastal space by the rock wall (originally consented to be built in 2005). Whilst this consent requires that the structure is maintained, it is likely that maintenance activities would be permitted under Rule 40 of the Regional Coastal Plan for Taranaki (RCP) so long as the activity complies with the standards, terms and conditions of the rule. A copy of this rule has been included in Appendix III.

The rock wall is in an area that is known to be a Kororā (Little Blue Penguin) hotspot, with both the penguin and the area identified in the significant indigenous biodiversity schedule of the RCP (Schedule 4). Therefore particular attention needs to be paid to penguin habitat in this instance.<sup>2</sup>

## 1.3 Resource consents

The Company holds two resource consents, the details of the consents are summarised in Table 1. 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 Appendix I, as are copies of all permits held by the Company during the period under review.

Table 1 Resource consents held by Wai-iti Motor Camp Ltd

Consent number	Purpose	Granted	Review	Expiry
Water discharge permits				
1971-4.0	To discharge treated domestic wastewater via soakage trenches onto and into land at the Wai-iti Beach Motor Camp	7 Sep 2022	Jun 2025	1 Jun 2039
Coastal permits				
6462-2.0	To continue to occupy the coastal space associated with boulder rip rap toe protection in the coastal marine area on the Wai-iti Beach foreshore	7 Sep 2022	Jun 2027	1 Jun 2039

<sup>1</sup> The Council has used these compliance grading criteria for more than 20 years. They align closely with the 4 compliance grades in the MfE Best Practice Guidelines for Compliance, Monitoring and Enforcement, 2018

<sup>2</sup> The Council has developed a guidance document to assist with achieving compliance with Rule 40 of the RCP. Coastal Structure Maintenance; Guidance for planning works with regard to Kororā/Little Blue Penguins. This document can be located through the Council's website.

## 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 Wai-iti Beach Retreat consists of four 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;
- 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 Data review

The consent for the discharge of treated wastewater contains conditions relating to the monitoring and recording of the discharge rate and daily discharge volume. The data for the year ending 30 June 2024 was provided to Council for review.

### 1.4.4 Site inspections

Wai-iti Beach Retreat was visited three times during the monitoring period. With regard to the consent for the discharge to land, the main points of interest were inspection of the effluent dispersal beds and site processes with potential or actual discharges to receiving watercourses, including unprocessed effluent. Air inspections actual and potential emissions of offensive odour. The rock wall was inspected for structural integrity and erosion, and the neighbourhood was surveyed for environmental effects.

### 1.4.5 Bacteriological sampling

Samples were collected at five sites during the second site inspection. Three samples were collected from the Wai-iti Stream and two from coastal sites either side of the stream mouth (Table 2, Figure 1, and Photo 3).

Table 2 Locations of bacteriological sampling sites at the Wai-iti Beach Retreat

Site location	Site code	GPS coordinates (NZTM)
Wai-iti Stream upstream of the Retreat	WIT000420	1727999-5690544
Wai-iti Stream approx. 10m d/s of tributary	WIT000460	1727896-5690572
Wai-iti Stream adjacent beach entrance	WIT000490	1727686-5690533
Sea coast approx. 75m north of stream mouth	SEA900060	1727667-5690609
Sea coast approx. 30m south of stream mouth	SEA900063	1727555-5690516

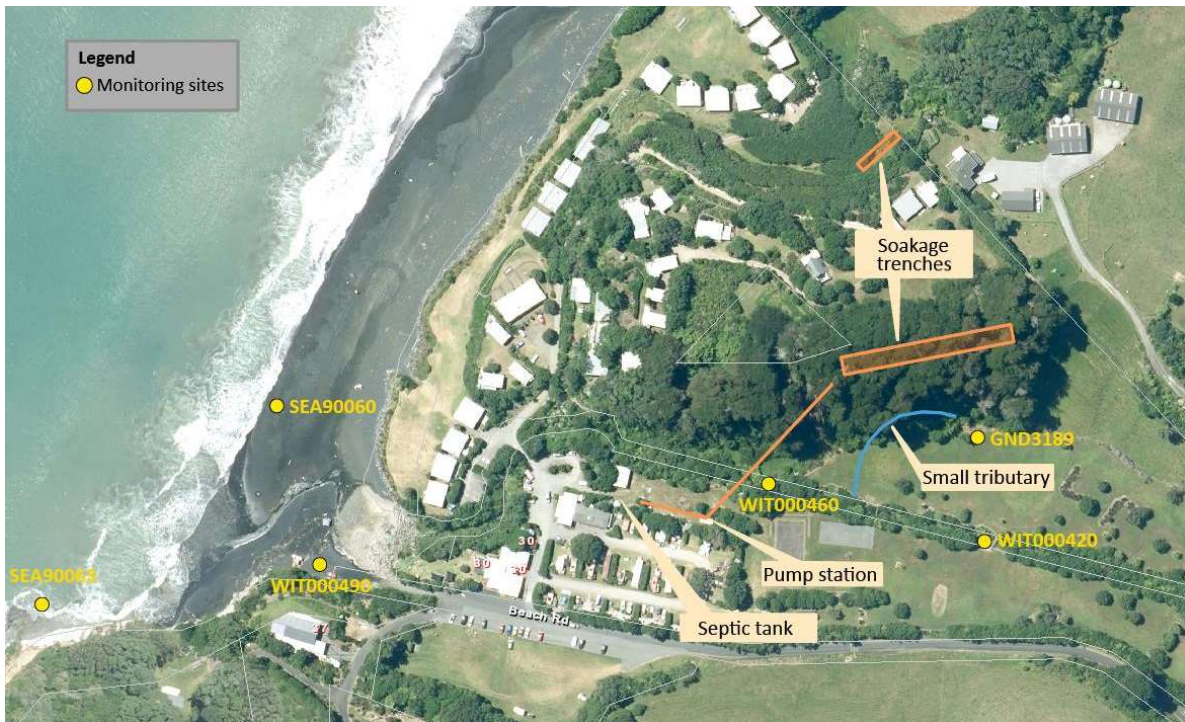


Figure 1 Locations of wastewater treatment system and sampling sites at the Wai-iti Beach Retreat

Samples were analysed for temperature, conductivity and the faecal indicator bacteria (FIB) enterococci or *Escherichia coli* (*E. coli*). 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 is of significant interest at this site as Wai-iti Beach receives high recreational use over the bathing season. 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 (MfE, 2003). For freshwater the MfE 2003 guidelines use *E. coli* as the preferred indicator. 'Alert' and 'Action' guideline levels are summarised in Table 3 and are based on keeping illness risk associated with recreational use to less than 2% of users.

Table 3 Summary of the 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/100ml)	No single sample > 260	Single sample > 260	Single sample > 550



Photo 2 Wai-iti Beach, looking from site SEA900060 towards SEA900063, with the Wai-iti Stream entering from centre-left

### 1.4.6 Groundwater sampling

The renewal of Consent 1971-4.0 on 7 September 2022 included an additional condition requesting the installation of a piezometer for the purpose of groundwater level and water quality sampling. The new monitoring bore was installed on 17 February 2023 by Geosearch and is located 50m east of the original proposed location by the Council. The new location was agreed upon to avoid any influence of the disused effluent bed on the monitoring of the current field. A baseline groundwater survey was conducted on 7 December 2023. Two further groundwater surveys were conducted alongside the first and last inspection of the monitoring year to determine any changes in groundwater quality. The details of the new monitoring bore are presented in Table 4 and Figure 2.

Table 4 Details of piezometer installation

Site code	GPS coordinates (NZTM)	Total depth (m)	Screen (m)	Diameter (mm)	Stick up (m)
GND3189	1727995-5690594	2.5	1.4-2.5	32	0.4



Figure 2 Location of the new piezometer/GND3189 in relation to the old and present effluent beds. The yellow circle represents a 50m radius

## 2. Results

### 2.1 Site Inspections

Site inspections were carried out on 7 December 2023, 26 January and 20 February 2024.

On all occasions the dispersal field appeared to be in good order with no noticeable dampness, slumping or odour. The piping that is visible and associated with the field also appeared to be in reasonable condition. There was no odour noticed from the effluent bed drain. There was a little odour evident around the septic tank, but this was not objectionable. During the January inspection the rip rap toe wall was in sound condition with no obvious adverse impact on the foreshore or seabed.

The camp appeared to be operating in compliance with its consent conditions at the time of each inspection.

### 2.2 Results of bacteriological monitoring

A summary of historical bacteriological results from January 1993 to January 2023 is presented in Table 5. Results from WIT000460 are from January 2000 onwards. Median *E. coli* counts are historically higher at the freshwater sites monitored downstream of the camp, particularly at the site located 10m downstream of the unnamed tributary. This is a reflection of the historical issues with wastewater disposal at the camp. These higher FIB counts are typically not reflected at the coastal sites, due to the high degree of mixing and dilution that occurs where the stream meets the Tasman Sea.

The results of the routine bacteriological monitoring undertaken during the 2023/24 summer monitoring period are presented in Table 6. The FIB counts of the samples collected in January 2024 from the three freshwater sites were all at 'Action' mode under the Freshwater Recreational Bathing Guidelines (MfE, 2003; Table 3). When compared to the upstream site, there was a decrease in *E. coli* numbers 10m downstream of the confluence with the small unnamed tributary. *E. coli* numbers at all freshwater sites have increased substantially since the previous year with numbers in the stream at the beach higher than the historical median (TRC, 2023; Table 5). Enterococci counts at both coastal sites were low and easily within the 'Surveillance' mode for Marine Recreational Bathing Guidelines (MfE, 2003; Table 3).

Table 5 Summary of previous bacteriological results from 1993-2023

	Upstream WIT000420		10m downstream tributary WIT000460		Stream at beach WIT000490		Coast 75 m N SEA900060		Coast 30 m S SEA900063	
	<i>E. coli</i> (MPN <sup>a</sup> / 100ml)	EC (mS/m)	<i>E. coli</i> (MPN/ 100ml)	EC (mS/m)	<i>E. coli</i> (MPN/ 100ml)	EC (mS/m)	Ent (cfu/ 100mL)	EC (mS/m)	Ent (cfu/ 100mL)	EC (mS/m)
Number of samples	32	33	26	27	28	29	31	30	30	29
Minimum	150	15.6	230	15.2	210	15.8	<1	3,430	<1	3,790
Maximum	2,700	23.7	3,100	23.8	2,700	25.6	1,400	5,470	140	5,470
Median	675	18.4	690	18.4	665	19.3	9	4,680	7	4,690

Note: <sup>a</sup> MPN and cfu are equivalent



Table 6 Bacteriological monitoring results for Wai-iti Beach Retreat during the 2023-24 monitoring period

Date	Upstream WIT000420		10m downstream tributary WIT000460		Stream at beach WIT000490		Coast 75m N SEA900060		Coast 30m S SEA900063	
	<i>E. coli</i> (MPN/ 100ml)	EC (mS/m)	<i>E. coli</i> (MPN/ 100ml)	EC (mS/m)	<i>E. coli</i> (MPN/ 100ml)	EC (mS/m)	Ent (cfu/ 100mL)	EC (mS/m)	Ent (cfu/ 100mL)	EC (mS/m)
26 Jan 2024	613	19.6	579	19.7	770	20.5	8	5210	7	5190

## 2.3 Results of groundwater monitoring

The results of the groundwater monitoring undertaken during the 2023/24 summer monitoring period are presented in Table 7. Both Enterococci and *E. coli* counts were low across the two samples collected. Various nitrogen species and total phosphorous were also analysed for on each sample. At this point in time, the results showed little to no impact of the Wai-iti WWTP on groundwater quality.

Table 7 Groundwater monitoring results for Wai-iti Beach Retreat during the 2023/24 monitoring period

Date	GND3189			
	pH	Conductivity <sup>a</sup> ( $\mu$ S/cm)	Enterococci (cfu/100ml)	<i>E. coli</i> (cfu/100ml)
07 Dec 2023	6.5	293	<1	<1
20 Feb 2024	6.6	320	3	<1

Note: <sup>a</sup> Specific conductivity by field meter

## 2.4 Provision of consent holder data

The Company provided records of average daily effluent volumes discharged to the soakage trenches between 1 July 2023 and 30 June 2024 (Appendix IV). The average daily discharge volumes were well below the consent limit. The Company continues to restrict the hours of operation of the effluent pump to 1 to 2 hours per day in order to ensure that less than 10m<sup>3</sup> is discharged on any one day.

Condition 6 of Consent 1971-4 requires the installation and maintenance of a data logger and recording system that measures and records the rate and volume of the discharge to an accuracy of  $\pm$  5%, at intervals not exceeding 15 minutes. This system was to be installed by 31 December 2022. Condition 7 further details the record requirements. Due to the WWTP only pumping 1-2 hours per day, condition 6 is currently under review as the Council determines whether the data received from the Consent Holder is sufficient enough to satisfy compliance.

## 2.5 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 the Wai-iti Beach Retreat. 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 proactive 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).

In the 2023/24 period, the Council was not required to undertake 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

The Wai-iti Beach Retreat WWTP was found to be operating well over the 2023/24 monitoring year. During the three inspections, no objectionable or offensive odour was found beyond the plant boundary. Additionally, no visual issues were observed with the plant, soakage trenches and associated piping.

The average daily discharge volumes were well below the consent limit (Appendix III). As it stands, the Company provides average discharge volumes over a two hour period, daily. With no conditions limiting flow and a restricted discharge period, the consent holder has requested the removal of condition 6, which is currently under review with the Council.

The freshwater results were found to be at 'Action' level for FIB (MfE 2003; Table 6). Contrary to historical data, the upstream site had higher *E. coli* numbers, with counts 10m downstream of the unnamed tributary lower than both upstream and the stream at the beach sites. As the Wai-iti Stream is surrounded by farmland, it is therefore unlikely that high FIB counts were only attributed to the WWTP in operation. Additionally, the area experienced moderate to heavy rainfall from early to mid-morning three days prior to sampling. The accumulation of agricultural, stormwater and wastewater runoff to the stream particularly at the beach presumably explain the higher FIB counts seen on this sampling day.

The pathogens that occur in faecal matter present a health risk. Although the stream is not thought to be commonly bathed in, the presence of eels attracts people to the stream banks and it is often crossed where it runs out over the beach. These considerations highlight the importance of maintaining the wastewater treatment and disposal systems at the Retreat as well as ensuring public awareness of the impacts of stormwater on recreational water quality particularly after a rain event. In the coastal water, where most people are likely to bathe, counts were well within 'Surveillance' mode (MfE, 2003; Table 3). The health risk overall, was therefore considered to be low.

The addition of groundwater monitoring to the 2023/24 programme allows the Council to track impacts to groundwater quality from the WWTP. In the first year, groundwater samples returned low FIB counts which suggests there is no contamination occurring to groundwater from the treatment plant at present. Continued monitoring will build a more representative picture of groundwater quality.

The rock wall looked to be in good condition with no scouring or adverse impacts on the foreshore or seabed noted during the period under review.

### 3.2 Environmental effects of exercise of consents

Elevated phosphorous and nitrogen in the receiving environment can result in negative environmental impacts. Some forms of nitrogen are toxic to aquatic fauna and can directly harm macroinvertebrates and fish. Elevated levels of nitrate in groundwater is toxic to humans, if used for drinking water. An overload of nitrogen and phosphorous in surface water can also result in excess algae growth, which in extreme cases, reduces the amount of oxygen in the water, posing a threat to aquatic life. If high counts of FIB are found in groundwater or surface water, this indicates that other harmful bacteria and pathogens are present, posing a risk to human health.

The operation of the wastewater system at the Wai-iti Beach Camp was not found to have any adverse effects on surface water or groundwater quality during the 2023/24 monitoring period. Routine monitoring of seawater continues to return low FIB counts, which suggest there is no contamination occurring between the wastewater treatment plant and the coast. High *E. coli* counts continue to be present in Wai-iti Stream

however due to the location of the beach camp and surrounding environment and land use purposes, it is likely these elevated counts are not from the Wai-iti Beach Camp alone.

### 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 8-9.

Table 8 Summary of performance for Consent 1971-4.0

<b>Purpose: To discharge treated domestic wastewater via soakage trenches onto and into land at the Wai-iti Beach Motor Camp</b>		
<b>Condition requirement</b>	<b>Means of monitoring during period under review</b>	<b>Compliance achieved?</b>
1. Exercise of the consent in accordance with application documentation	Site inspection and liaison with consent holder	Yes
2. Additional soakage trench to be installed by 31 December 2022	Site inspection	Yes
3. Adopt best practicable option to prevent or minimise adverse effects	Site inspection	Yes
4. Notification of changes that could alter the nature of the discharge	Site inspection and review of Council records.	Yes
5. Discharge not to exceed 30m <sup>3</sup> per day	Review of data required by condition 7	Yes
6. Requirement to record 15 minute data for the rate and volume discharged accurate to ±5%	Site inspection, review of data required by condition 7 and liaison with consent holder. Email from consent holder advising meter is installed.	No – condition under review
7. Specifies data recording requirements and the provision of each year's data to 30 June within one month	Review of the daily average discharge data provided to the Council	Yes
8. Prohibits run off and ponding and contamination of ground and surface water	Site inspection	Yes
9. Prohibits offensive or objectionable odours beyond the site boundary	Site inspection	Yes
10. Provision of treated wastewater sampling point required	Sampling point is available	Yes
11. Installation of groundwater monitoring bore by 31 December 2022	Installed 17 February 2023. Delays due to wet weather/ground conditions	Yes
12. Discharge to be operated in accordance with certified Management Plan by 31 December 2022	Approved Management Plan received November 2023	Yes
13. Optional review provision re environmental effects or provision of discharge data	Next opportunity for review June 2025	N/A
Overall assessment of consent compliance and environmental performance in respect of this consent		<b>High</b>
Overall assessment of administrative performance in respect of this consent		<b>Good</b>

N/A = not applicable

Table 9 Summary of performance for Consent 6462-2

Purpose: To continue to occupy the coastal space associated with boulder rip rap toe protection in the coastal marine area on the Wai-iti Beach foreshore		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
1. Authorisation to occupy limited to 293m of boulder rip rap	Site inspections	Yes
2. Structure to be maintained in a safe and sound state	Site inspections	Yes
3. Prohibits significant erosion due to the structure	Site inspections	Yes
4. Specifies actions to be taken if significant or potentially significant erosion is found	Site inspections	N/A
5. Optional review provision re. environmental effects	Next review opportunity June 2027	N/A
Overall assessment of consent compliance and environmental performance in respect of this consent		High
Overall assessment of administrative performance in respect of this consent		High

N/A = not applicable

Table 10 Evaluation of environmental performance over time

Year	Consent numbers	High	Good	Improvement req	Poor
2019/20	1971, 6462	1	x	x	x
2020/21	1971, 6462	1	x	x	x
2021/22	1971, 6462	1	x	x	x
2022/23	1971, 6462	1	x	x	x
2023/24	1971, 6462	1	x	x	x

During the year, the Company demonstrated a high level of environmental and good administrative performance with the resource consents as defined in Appendix II. The Council continues to work with the Company to ensure that the data collected and provided to Council is suitable for auditing, as required by the conditions of the replacement wastewater discharge consent granted in September 2022.

### 3.4 Recommendations from the 2022/23 Annual Report

In the 2022/23 Annual Report, it was recommended:

1. THAT in the first instance, monitoring of consented activities at Wai-iti Beach Retreat in the 2023/24 year include the addition of groundwater monitoring; and
2. THAT should there be issues with environmental or administrative performance in 2023/24, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.

These recommendations were implemented as appropriate.

### 3.5 Alterations to monitoring programmes for 2024/25

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 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 2023/24.

## 4. Recommendations

1. THAT in the first instance, monitoring of consented activities at Wai-iti Beach Retreat in the 2024/25 year continues at the same level as in 2023/24; and
2. THAT should there be issues with environmental or administrative performance in 2024/25, 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:

Action mode	Marine: two consecutive single samples >280 enterococci/100ml. Freshwater: single sample >550 <i>E. coli</i> /100ml.
Alert mode	Marine: single sample 141-280 enterococci/100ml. Freshwater: single sample 261-550 <i>E. coli</i> /100ml.
Bathers	Those who enter the water, and either partially or fully immerse themselves.
Bathing season	Generally the bathing season extends between 1 November and 31 March.
Beach	The shore or any access point to the sea.
BODCF	Biochemical oxygen demand of a filtered sample.
cfu	Colony forming units. A measure of the concentration of bacteria usually expressed as per 100ml sample.
Conductivity	An indication of the level of dissolved salts in a sample, usually measured at 20°C and expressed in mS/m.
Contact recreation	Recreational activities that bring people physically in to 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 100ml of sample.
Ent	Enterococci, an indicator of the possible presence of faecal material and pathological micro-organisms. Usually expressed as colony forming units per 100ml of sample.
FC	Faecal coliforms, an indicator of the possible presence of faecal material and pathological micro-organisms. Usually expressed as colony forming units per 100ml of sample.
FIB	Faecal Indicator Bacteria – in this report it refers collectively to <i>E. coli</i> , enterococci and faecal coliforms.
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.
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.
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 the circumstances/events surrounding an incident, including any allegations of an incident.
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.



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> including all subsequent amendments.
Temperature	Measured in °C (degrees Celsius).
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 manager within the Environment Quality Department.

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## Appendix I

### Resource consents held by Wai-iti Motor Camp Limited

(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: Wai-iti Motor Camp Limited

Decision Date: 7 September 2022

Commencement Date: 7 September 2022

**Conditions of Consent**

Consent Granted: To discharge treated domestic wastewater via soakage  
trenches onto and into land at the Wai-iti Beach Motor Camp

Expiry Date: 1 June 2039

Review Date(s): June 2023 and every two years thereafter

Site Location: 30 Beach Road, Wai-iti

Grid Reference (NZTM) 1727948E-5690724N

Catchment: Waiiti

*For General, Standard and Special conditions  
pertaining to this consent please see reverse side of this document*

### General condition

- a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

### Special conditions

1. The exercise of this consent shall be undertaken generally in accordance with the documentation submitted in support of the original application and any subsequent applications to change conditions. In case of any contradiction between the documentation submitted in support of previous applications and the conditions of this consent, the conditions of this consent shall prevail.
2. The additional soakage trench shall be installed in accordance with the report prepared by Civil Infrastructure Consulting, dated 29 October 2020, submitted with the application, and online by 31 December 2022.
3. The consent holder shall at all times adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise any actual or likely adverse effect on the environment associated with the discharge.
4. The consent holder shall advise the Taranaki Regional Council prior to making any change in the processes undertaken at the site which could significantly alter the nature of the discharge. The advice shall be given by emailing [consents@trc.govt.nz](mailto:consents@trc.govt.nz).
5. The discharge shall not exceed 30 m<sup>3</sup> in any 24 hour period ending at midnight (New Zealand standard time).
6. Before 31 December 2022, the consent holder shall install and thereafter maintain a meter and a datalogger at the site of discharge. The flow meter and datalogger shall be tamper-proof and shall measure and record the rate and volume of the discharge to an accuracy of  $\pm 5\%$ , at intervals not exceeding 15 minutes.

*Note: Water meters and dataloggers must be installed, and regularly maintained, in accordance with manufacturer's specifications in order to ensure that they meet the required accuracy. Even with proper maintenance water meters and dataloggers have a limited lifespan.*

7. The records of discharge shall:
  - a) include the time, and the rate and volume of the discharge;
  - b) be in a format that, in the opinion of the Chief Executive, Taranaki Regional Council, is suitable for auditing; and
  - c) for each 12-month period ending on 30 June, be provided to the Chief Executive, Taranaki Regional Council within one month after the end of that period.
8. There shall be no surface run-off, ponding, or contamination of surface water or groundwater resulting from the discharge of treated wastewater to land.
9. There shall be no offensive or objectionable odour beyond the boundaries of the subject property.



## Consent 1971-4.0

10. The consent holder shall ensure that there is a point where the treated wastewater can be sampled before it is discharged to the land application area. The consent holder shall provide access for the Taranaki Regional Council to enable a sample to be taken as required.
11. Before 31 December 2022, the consent holder shall after consultation with the Chief Executive, Taranaki Regional Council, install at least one piezometer. The piezometer shall be at a location, and to a depth, that enables monitoring to determine any change in groundwater quality resulting from the exercise of this consent. The piezometer shall be installed in accordance with NZS 4411:2001 and all associated costs shall be met by the consent holder.
12. From 31 December 2022, the discharge shall be operated in accordance with a 'Management Plan' prepared by the consent holder and approved by the Chief Executive, Taranaki Regional Council, acting in a certification capacity. The Management Plan shall detail how the site is to be managed and monitored and shall include as minimum:
  - a) monitoring the wastewater quality and rate of the discharge;
  - b) management of the wastewater treatment system;
  - c) general housekeeping; and
  - d) reporting.
13. 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 2023 and every two years thereafter for the purposes of:
  - a) 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; and/or
  - b) requiring any data collected in accordance with the conditions of this consent to be transmitted directly to the Taranaki Regional Council's computer system, in a format suitable for providing a 'real time' record over the internet.

Signed at Stratford on 7 September 2022

For and on behalf of  
Taranaki Regional Council

  
\_\_\_\_\_  
A D McLay  
**Director - Resource Management**



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

Name of  
Consent Holder: Wai-iti Motor Camp Limited

Decision Date: 7 September 2022

Commencement Date: 7 September 2022

**Conditions of Consent**

Consent Granted: To continue to occupy the coastal space associated with boulder riprap toe protection in the coastal marine area on the Wai-iti Beach foreshore

Expiry Date: 1 June 2039

Review Date(s): June 2027, June 2033

Site Location: 30 Beach Road, Waiiti

Grid Reference (NZTM) 1727747E-5690675N

Catchment: Tasman Sea

*For General, Standard and Special conditions  
pertaining to this consent please see reverse side of this document*

**General condition**

- a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

**Special conditions**

1. This consent authorises the occupation of space in the Coastal Marine Area by boulder riprap protection up to 293 metres long.
2. The consent holder shall maintain the structure in a safe and sound state such that:
  - a) it does not fall into a state of disrepair and continues to function effectively for the purpose it was designed;
  - b) its structural integrity is maintained; and
  - c) there is no settlement or loss of foundation material.
3. The structure shall not cause significant erosion of the foreshore or seabed.
4. If significant or potentially significant erosion near the structure occurs, the consent holder shall, as soon as practicable, undertake an investigation to determine its cause and identify options to avoid, remedy or mitigate the adverse effects of that erosion. The details of the investigation shall be approved by the Chief Executive, Taranaki Regional Council, acting in a certification capacity.
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 2027 and/or June 2033, 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 7 September 2022

For and on behalf of  
Taranaki Regional Council

  
\_\_\_\_\_  
A D McLay  
**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.





## Appendix III

Daily effluent volume data (m<sup>3</sup>)  
provided by Wai-iti Beach Retreat  
for 2023/24



July 2023	Reading 7176-00	M3
1	7180-24	4.24
2	7187-23	6.99
3	7188-07	0.84
4	7191-41	3.34
5	7194-43	3.02
6	7196-11	1.68
7	7197-52	1.41
8	7199-72	2.01
9	7201-36	1.64
10	7203-72	2.36
11	7205-47	1.75
12	7206-91	1.44
13	7208-17	1.26
14	7209-89	1.20
15	7211-95	2.08
16	7214-63	2.68
17	7216-40	1.77
18	7218-25	1.05
19	7218-31	0.06
20	7218-36	0.05
21	7219-32	0.98
22	7220-29	0.97
23	7221-30	1.01
24	7222-29	0.99
25	7223-30	1.01
26	7224-26	0.96
27	7225-29	1.03
28	7226-83	1.54
29	7227-94	1.11
30	7229-32	1.36
31	7230-72	1.40

August 2023	Reading 7230-72	M3
1	7233-05	2.33
2	7234-23	1.18
3	7236-31	2.08
4	7238-47	2.16
5	7240-44	1.97
6	7242-17	1.73
7	7243-59	1.42
8	7244-03	0.44
9	7245-86	1.83
10	7246-85	1.05
11	7248-34	1.49
12	7249-64	1.30
13	7252-65	3.01
14	7256-10	3.74
15	7259-07	2.88
16	7262-40	3.33
17	7264-54	2.14
18	7267-39	2.58
19		
20	7296-30	
21	7273-85	2.15
22	7275-60	1.75
23	7281-79	6.19
24	7284-57	2.78
25	7286-50	1.93
26	7288-06	1.58
27	7289-61	1.55
28	7291-81	2.20
29	7293-60	1.79
30	7298-07	1.47
31	7297-54	1.24

September 2023	Reading	M3
1	7298-56	1.02
2	7300-00	1.44
3	7301-74	1.74
4	7303-20	1.48
5	7304-44	1.24
6	7306-52	2.08
7	7309-04	2.52
8	7310-38	1.34
9	7311-85	1.47
10	7313-74	1.85
11	7314-37	1.23
12	7316-71	2.34
13	7318-04	1.33
14	7319-20	1.16
15	7320-57	1.37
16	7322-11	1.54
17	7324-55	2.44
18	7326-10	1.55
19	7327-19	1.09
20	7328-20	1.01
21	7329-26	1.06
22	7331-07	1.81
23	7332-78	1.71
24	7335-11	2.33
25	7337-23	2.12
26	7340-12	2.89
27	7341-72	1.58
28	7343-26	1.54
29	7344-42	1.16
30	7346-62	2.20

October 2023	Reading	M3
1	7348-99	2.37
2	7351-09	2.10
3	7354-65	3.56
4	7356-02	1.37
5	7357-02	1.00
6	7358-34	1.32
7	7361-01	2.67
8	7362-93	2.92
9	73366-71	2.78
10	7369-60	2.89
11	7370-02	0.42
12	7370-02	0.40
13	7371-89	1.87
14	7374-00	2.13
15	7377-49	3.49
16	7379-77	2.28
17	7382-06	2.25
18	7383-07	1.01
19	7385-23	2.16
20	7386-77	1.54
21	7388-14	1.37
22	7390-81	2.67
23	7394-73	3.92
24	7397-09	2.36
25	7399-04	1.99
26	7400-55	1.51
27	7402-91	2.36
28	7404-91	2.00
29	7407-57	2.66
30	7410-14	2.57
31	7411-00	0.86

November 2023	Reading	M3
1	7413-90	2.90
2	7415-15	1.25
3	7417-04	1.89
4	7419-43	2.39
5	7422-43	3.00
6	7425-01	2.58
7	7427-86	2.85
8	7430-93	3.07
9	7433-89	2.96
10	7436-38	2.49
11	7438-29	1.91
12	7440-47	2.18
13	7442-80	2.33
14	7444-00	1.20
15	7445-05	1.05
16		
17	7446-14	1.09
18	7447-98	1.84
19	7454-74	6.76
20	7459-44	4.70
21	7461-18	1.74
22	7465-63	4.45
23	7466-81	1.18
24	7467-99	1.18
25	7469-66	1.67
26	7473-73	4.07
27	7475-53	1.80
28	7478-01	2.48
29	7480-35	2.34
30	7482-12	1.77

December 2023	Reading	M3
1	7483-38	1.26
2	7485-23	1.85
3	7488-03	2.80
4	7491-04	3.01
5	7493-79	2.75
6	7495-55	1.76
7	7497-36	1.81
8	7498-48	1.12
9	7500-50	2.02
10	7503-57	3.07
11	7506-10	2.53
12	7509-64	3.54
13	7511-25	1.61
14	7512-54	1.29
15	7513-84	1.30
16	7516-27	2.43
17	7519-11	2.84
18	7522-13	3.02
19	7525-77	3.64
20	7529-34	3.57
21	7534-71	5.37
22	7539-06	4.35
23	7544-30	4.76
24	7549-41	5.11
25	7556-75	5.67
26	7560-06	3.31
27	7565-93	5.87
28	7572-79	6.86
29	7581-65	7.86
30	7591-91	10.26
31	7598-21	6.30



January 2024	Reading 7598-21	M3
1	7605-60	7.39
2	7612-02	6.42
3	7618-60	6.58
4	7624-12	6.72
5	7632-22	8.10
6	7639-75	7.53
7	7645-98	6.23
8	7652-19	6.19
9	7659-42	7.23
10	7665-31	5.89
11	7670-42	5.11
12	7675-23	4.81
13	7683-80	5.57
14	7692-13	8.33
15	7699-63	7.50
16	7707-57	6.94
17	7712-01	5.44
18	7715-90	3.89
19	7799-74	3.84
20	7724-72	4.98
21	7732-54	7.82
22	7735-54	3.00
23	7737-97	2.43
24	7741-51	3.54
25	7745-18	3.67
26	7748-46	3.38
27	7753-51	5.05
28	7758-67	5.16
29	7765-83	7.16
30	7768-17	2.34
31	7770-65	2.48

February 2024	Reading	M3
1	7772-22	1.57
2	7773-65	1.43
3	7777-42	3.77
4	7784-06	6.64
5	7787-45	3.39
6	7791-36	3.91
7	7794-60	3.24
8	7795-89	1.29
9	7797-10	1.21
10	7798-86	1.76
11	7802-50	3.64
12	7803-51	1.01
13	7805-31	1.80
14	7808-59	3.29
15	7510-00	1.41
16	7811-24	1.24
17	7812-95	1.71
18	7815-53	2.58
19	7817-99	2.46
20	7820-04	2.05
21	7822-63	2.59
22	7823-74	1.11
23	7525-05	1.3
24	7827-66	2.61
25	7836-63	8.97
26	7840-75	4.12
27	7842-09	1.34
28	7843-41	1.32
29	7844-76	1.35

March 2024	Reading 7844-76	M3
1	7846-39	1.63
2	7848-30	1.91
3	7851-66	3.36
4	7854-26	2.60
5	7857-21	2.95
6	7858-75	1.54
7	7860-10	1.35
8	7861-05	0.95
9	7862-09	1.04
10	7866-85	4.76
11	7872-12	5.27
12	7875-53	3.41
13	7876-88	1.35
14	7878-06	1.18
15	7879-18	1.12
16	7880-58	1.40
17	7882-59	2.01
18	7884-62	2.03
19	7886-40	1.78
20	7887-62	1.22
21	7889-03	1.44
22	7890-43	1.40
23	7894-20	3.77
24	7896-92	2.72
25	7899-05	2.13
26	1900-48	1.43
27	7901-66	1.18
28	7902-82	1.16
29	7903-99	1.17
30	7905-88	1.89
31	7909-34	3.49

Date Read	Average Volume per day
24/03/2023	1.50
25/03/2023	2.85
26/03/2023	2.05
27/03/2023	1.48
28/03/2023	1.14
29/03/2023	1.79
30/03/2023	1.27
31/03/2023	2.91
1/04/2023	2.79
2/04/2023	6.36
3/04/2023	4.47
4/04/2023	2.97
5/04/2023	1.19
6/04/2023	1.33
7/04/2023	1.25
8/04/2023	7.10
9/04/2023	6.58
10/04/2023	6.34
11/04/2023	5.99
12/04/2023	3.34
13/04/2023	2.20
14/04/2023	2.20
15/04/2023	2.62
16/04/2023	3.55
17/04/2023	3.25
18/04/2023	2.37
19/04/2023	2.60
20/04/2023	0.96
21/04/2023	1.10
22/04/2023	5.16
23/04/2023	0.92
24/04/2023	1.93
25/04/2023	3.95
26/04/2023	1.05
27/04/2023	0.97
28/04/2023	2.06
29/04/2023	1.05
30/04/2023	4.40
1/05/2023	1.02
2/05/2023	1.73
3/05/2023	1.78
4/05/2023	6.94
5/05/2023	5.11
6/05/2023	7.33
7/05/2023	2.23

April 2024	Reading 7909-34	M3
1	7913-22	3.88
2	7918-34	5.12
3	7919-83	1.49
4	7921-16	1.33
5	7922-45	1.29
6	7923-72	1.27
7	7925-27	1.55
8	7926-93	1.66
9	7928-04	1.11
10	7929-06	1.02
11	7929-25	0.19
12	7931-73	2.48
13	7934-65	2.92
14	7938-93	4.27
15	7940-45	1.52
16	7941-93	1.48
17	7943-25	1.32
18	7944-42	1.17
19	7945-46	1.04
20	7946-50	1.04
21	7948-97	2.47
22	7950-77	2.77
23	7952-89	2.12
24	7954-72	1.83
25	7956-24	1.52
26	7959-16	2.92
27	7962-16	3.00
28	7964-77	2.61
29	7966-83	2.59
30	7969-75	2.92

Date Read	Average Volume per day
8/05/2023	3.57
9/05/2023	2.85
10/05/2023	0.89
11/05/2023	3.94
12/05/2023	6.66
13/05/2023	3.42
14/05/2023	3.10
15/05/2023	1.65
16/05/2023	2.78
17/05/2023	1.05
18/05/2023	1.24
19/05/2023	1.08
20/05/2023	2.49
21/05/2023	2.42
22/05/2023	2.85
23/05/2023	5.67
24/05/2023	1.05
25/05/2023	1.27
26/05/2023	2.15
27/05/2023	0.99
28/05/2023	2.04
29/05/2023	1.84
30/05/2023	1.49
31/05/2023	1.88
1/06/2023	1.29
2/06/2023	1.96
3/06/2023	1.64
4/06/2023	1.83
5/06/2023	3.67
6/06/2023	2.46
7/06/2023	1.53
8/06/2023	1.34
9/06/2023	1.20
10/06/2023	1.42
11/06/2023	1.46
12/06/2023	1.56
13/06/2023	1.27
14/06/2023	1.28
15/06/2023	1.33
16/06/2023	1.41
17/06/2023	2.56
18/06/2023	2.69
19/06/2023	1.33
20/06/2023	1.54
21/06/2023	1.24

May 2024	Reading	M3
1	7970-73	0.98
2	7971-96	1.23
3	7973-11	1.15
4	7974-40	1.29
5	7976-59	2.15
6	7979-64	3.05
7	7981-76	2.12
8	7983-42	1.66
9	7984-70	1.28
10	7955-93	1.77
11	7987-22	2.71
12	7988-97	1.75
13	7990-07	1.10
14	7992-30	2.23
15	7994-03	1.73
16	7995-33	1.30
17	7996-84	1.51
18	7998-52	1.68
19	7999-90	1.38
20	8001-61	1.71
21	8003-86	2.25
22	8006-78	2.84
23	8007-96	1.18
24	8009-27	1.31
25	8011-99	2.72
26	8014-92	2.93
27	8016-47	1.55
28	8017-59	1.12
29	8019-08	1.49
30	8020-73	1.65
31	8022-03	1.30

Date Read	Average Volume per day
22/06/2023	2.23
23/06/2023	0.56
24/06/2023	1.73
25/06/2023	0.77
26/06/2023	2.19
27/06/2023	1.96
28/06/2023	3.24
29/06/2023	1.47
30/06/2023	1.11

**Total Volume**

**1,154.59**



June 2024	Reading 8022-03	M3
1	8023-01	0.98
2	8024-95	1.94
3	8026-65	1.70
4	8027-90	1.25
5	8029-63	1.73
6	8031-26	1.63
7	8033-03	1.77
8	8034-35	1.32
9	8035-10	0.79
10	8037-.19	2.09
11	8038-70	1.51
12	8040-00	1.30
13	8041-41	1.41
14	8043-20	1.79
15	8046-95	3.75
16	8048-76	1.81
17	8050-99	2.23
18	8052-87	1.88
19	8054-82	1.95
20	8056-34	1.52
21	8057-53	1.19
22	8058-96	1.43
23	8060-20	1.24
24	8061-63	1.43
25	8062-00	1.37
26	8063-00	1.00
27	8065-30	2.30
28	8067-09	1.79
29	8068-59	1.50
30	3069-84	1.25

