

To: Auckland Council (AC)

Name of Submitter: Piha Ratepayers & Residents Association Inc (“the Submitter”)

Submission: Auckland Council Annual Budget 2020/2021
Item 3: Waitākere rural sewerage service targeted rate

Introduction

1. This is a submission on the proposed changes to the Waitakere Ranges Rural Sewerage Service Targeted Rate.
2. The submitters interest is in the Piha Coastal Village area (“PCV”) bordered by the Waitakere Ranges Heritage Area (“WRHA”).

Background

3. The Submitter is an incorporated body that has been actively representing the Piha community since 1939. Members include property owners, business owners, permanent residents, holiday and weekend dwellers and property tenants. The Submitter has an active membership of ratepayers who are necessarily affected by changes in the rules and regulations affecting the installation and maintenance of On-site Waste Water disposal Systems on their properties. The Submitter has an informative website and facebook page with regular communications to members.

Issues

4. The submitter acknowledges that in the early 1990’s the legacy Waitakere City Council initiated a Council contracted mandatory 3 year pump-out for all septic tank systems in their area and initiated a targeted rate to cover the costs of that pump out. The motivation for this was to reduce effluent contamination of west Coast streams and lagoons and minimise the cost to property owners.
5. The submitter also recognises that there are two basic types of system acceptable to AC. First, the traditional Septic Tank and disposal field system and second, the newer “Hi-Tech” systems now mandatory for new installations and that each system has a different maintenance regime under the AUP. Both systems are present in the Piha area as well as isolated cases of “Long Drop” installations that are not specifically covered by the Auckland Unitary Plan (AUP).

6. The submitter acknowledges that AC, through the AUP has the power and related bylaws to require regular inspections of the on-site Waste water disposal systems and require pump out and/or maintenance of those systems where indicated by those inspections.
7. The submitter also notes that while AC has required that Hi-Tech system owners provide a copy of their maintenance contract for the system before issuing a Consent Certificate of Completion, AC has not maintained any data base to ensure that contracts are maintained.
8. AC has indicated that it will NOT subsidise the Waitakere Rural Sewerage Service Targeted Rate. However, AC has a large income from the Water Quality Targeted Rate and a clear obligation to the Waitakere rural area under the Waitakere Ranges Heritage Area Act 2008 (WHRA) requires AC to *“to manage aquatic and terrestrial ecosystems in the area to protect and enhance indigenous habitat values, landscape.”* A contribution to, or indeed payment of, the Waitakere Rural Sewerage Service Targeted Rate would acknowledge this legal obligation of AC.
9. The submitter believes that AC and property owners must make a good faith effort to achieve a level of maintenance of their on-site waste water disposal systems that ensure compliance with the principles of the RMA and AUP on a base of fairness and equality to all.

Problems

10. AC and some of their elected members and officers propound that the mandatory 3 year pump out regime has not improved the water quality of the West Coast streams and lagoons, and in particular the Piha Lagoon. There is no comparative quantitative and qualitative analysis to support that assertion.
11. AC has implemented a number of investigations into the pollution of the Piha Lagoons and the latest, (unpublished) by Tokin and Taylor in February 2015 notes in the executive summary that, *“A combination of focussing on reducing point source pollution and periodic excavation provide the most comprehensive approach to reducing contaminant levels within Piha Lagoon.”* This clearly indicates that while regular maintenance and pump-out of on-site wastewater systems is necessary, those measures will not, on their own, resolve the issue of pollution in the Piha lagoons.
12. The inspection of traditional Septic Tank type On-site Waste Water disposal systems for the purpose of assessing their functionality is not possible without a clear understanding of the many variables that impact on the function of those systems. Variables include, but are not limited to; Soil types at different levels of the site, the gradient of the site, the type of disposal field (if any), the type of septic tank utilised, the size of the septic tank, the extent of the disposal field, the size of the disposal system relative to the dwelling, the potential occupancy of the dwelling, the actual occupancy of the dwelling, the extent and duration of occupancy, and even the manner in which occupants of a dwelling act with regard to the accrual and discharge of waste water.

This is made clear in Auckland Regional Council (ARC) TP58 On-site Wastewater Systems: Design and Management Manual, a 223 page document that comprehensively details the extent of the variables that impact on-site wastewater disposal systems.

13. AC is now beginning to implement a regime of requesting from property owners, proof of having an inspection of their on-site waste water disposal system undertaken. However, local contractors who undertake this work have been unable to obtain from AC a clear understanding of the requirements of an inspection that must be included in a subsequent report.

Actions

14. The submitter believes that AC has a moral and legal obligation to continue with the Waitakere Rural Sewerage Service as a minimum responsibility.
15. The submitter believes that AC has a legal obligation to manage and enhance the ecosystem of the Waitakere Ranges and asks that AC take fiscal responsibility for the cost of the Waitakere Rural Sewerage Service through the Water Quality targeted rate levied on all Auckland Ratepayers.
16. The submitter strongly suggests that AC consider that the Waitakere Rural Sewerage Service might more appropriately be applied to the inspection of ALL on-site waste water disposal systems, including the high tech. systems, and that the cost of any pump-out requirement as a result of that inspection, be addressed as a separate issue.
17. The submitter has a strong interest in ensuring that Piha property owners are able to rely on the good administration of the Council to follow its own rules and regulations, that the Council ensures a reasonable degree of accuracy in its processes, and complies with the legal obligations under the WRHRA.

Yours faithfully,



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President

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