

Hahei Beach Ratepayers Association

31 August 2020

Thames Coromandel District Council
Private Bag
Thames

Attention: Mohamed Imtiaz

Subject: Comments on Draft Hahei Water and Sewage Expansion Feasibility Studies

Dear Mo,

Thank you for Inviting us to attend a meeting at TCDC, Thames to review the draft Harrison and Grierson Feasibility Studies (H&G FS). We understand the meeting will be rescheduled. However, in the meantime, you would like us to submit comments.

Our committee has reviewed the studies, we would like to make the following comments.

1 Community Consultation

While we can provide helpful factual information, it is important to understand that our organisation simply acts as facilitator for discussion and consultation with our community. All we can say it is likely that there is a diversity of opinions and to develop a consensus, it is most important for TCDC to engage with our community NOW. We strongly recommend that you hold a community workshop in Hahei as soon as possible, perhaps Labour Weekend to discuss water and wastewater options. The workshop should be followed up with a letter/survey to all Hahei property owners explaining water and sewage options and inviting them to comment. In this way, our non-resident owners will be informed of progress.

2 Lack of Costs Information

While the H&G FS contains interesting engineering studies, until you provide cost forecasts for each property in Hahei, it is impossible for us to make any serious comments.

We have seen what happened in Emma Place, where there was no consensus prior to construction, we cannot allow a similar situation to occur across the whole of Hahei. Before any construction takes place, every property owner must know and explicitly agree to cost of connecting to water and/or sewage.

The H&G FS should provide estimated individual costs for each scenario. We suggest that H&G should focus on the cost to each property located in the proposed Wigmore Stream collection area.

3 Population, No of Dwellings, and Growth

We are very concerned that the H&G Study is not based on accurate dwelling numbers, population and growth rates and strongly recommend H&R/TCDC review these. Until we have agreement on population served, water consumption, and growth rates, we cannot design water and sewage systems when any confidence.

3.1 Review of Appendix 2 - Existing Dwellings and Forecast Population

The Rationale Report, which you have used as the basis of forecasts, states that in 2018 there are 445 usual residents, and 770 dwellings. We think these numbers represent the total Hahei rateable area including Lees Rd, and perhaps Hot Water Beach and are not a correct basis for forecast in demand.

We have both counted properties on TCDC maps and consider the following a more accurate forecast for number of properties in Hahei Village in 2048.

	Long Term Scenario	
	Feasibility Study	Updated
TCDC - Water	138	138
HWSA	170	170
GRWA	64	77
Rainwater (Pa Rd/Wigmore)	348	174
Rainwater (Emmerdale/Hahei Beach Rd)		33
100 Acres	59	59
New Properties	143	10
Total	922	661

We recommend that H&G check these numbers carefully and further that we reach community consensus on long term coverage area.

If you are still expecting Hahei to grow, as described in the Rational Report, please show us where this can take place.

3.2 Tourism Growth–

We have seen rapid tourism growth over the past few years and we need to understand better its effect on our water and wastewater facilities. Issues that we need to understand better are,

- Most tourist to Hahei are day visitors who will use public toilets – how much water and wastewater?
- More properties are rented for longer periods, so water/sewage consumption is extended. How much?
- How does tourism affect our commercial area water/wastewater volumes?

3.3 Household and Commercial Area Water Consumption

All the existing water supply systems have detailed water consumption data and so we recommend H&G use this information to develop forecast per capita consumption. This will help us forecast average and peak flow for water and sewage.

We note that in recent years there have been an increased number of larger houses being built and several smaller dwellings replaced also by larger ones. Often these properties are permanently

occupied leading to an increased demand for both water and sewerage increase. We expect this trend may continue in the future, thus further increasing demand.

We also need to understand water/wastewater loads in our commercial area. For instance, what is the water consumption and wastewater load at our local brewery and are there any plans for expansion?

4 Water

4.1 Takeover/Partnering with Hahei Water Supply Association (HWSA)

Clearly, this is top priority for our community. The HWSA has written to you separately and we trust you will action their requests urgently.

4.2 Hahei Bore Water Capacity

As we experienced last summer and described in the Earthtech Report, the bores in Hahei are under stress. We strongly recommend TCDC immediately undertake a drilling program to find additional water for the combined TCDC/HWSA system.

4.3 Grange Road Water Association (GRWA).

We expect the Grange Road Water Association will continue own and operate its water. GRWA will send you a letter shortly setting out their position.

4.4 North Pa Road/Wigmore Crescent/Eastern Pa Road

This area currently has rainwater tanks. Before any more engineering work takes place, we recommend TCDC/H&G ask each property if they are interested in reticulated water. Our impression is that many are happy with their rainwater systems but would like to have the right to access water from the local TCDC water storage system if their tanks need topping up. Unless a significant majority wish to connect to a TCDC operate water system, then engineering work in this area should stop.

4.5 Long Term Water Demand

It seems likely that in the long term, only HWSA and TCDC, plus possibly the 100 Acres development will be water consumers in Hahei. H&G should prepare long term consumption forecasts for this area only.

4.6 TCDC Treatment Plant Upgrades

The H&G FS states that TCDC will upgrade and expand its current water treatment plant to provide 660m³/day by July 2022. Please explain:

- How a capacity 660m³/day was determined?
- Where will the supply bore water will come from?
- If neither GRWA nor the Rainwater properties (Pa Rd/Wigmore) connect to this system, then 660m³/day will be sufficient to serve Hahei well into the future, particularly if the proposed water storage tanks are built. Please comment.
- Please confirm that funding is available and there is no risk that this project will not proceed.

5 Sewage

5.1 Costs to Each Property

Before we can have a useful discussion about expanding sewage treatment in Hahei, TCDC must provide us with a detailed explanation of how construction and operating costs will be allocated to each property. We also need to understand TCDC's decision-making process. For instance, as was the case in Emma Place, property owners will have no option but to connect.

Specifically, we need to understand the following

5.1.1 Construction Costs

We would like to understand exactly how TCDC proposed recovering the construction cost from each property owner. Here are some key issues we would like TCDC to provide guidance on.

5.1.1.1 Costs Prior to Treatment Plant Expansion

It is proposed that the approx. 80 properties along Wigmore Stream and Wigmore Crescent are connected since they may be responsible for contaminating the Wigmore Stream. The report states that the treatment plant has spare capacity for approximate 80 properties, so would these properties simply pay for the cost of running a sewer collection system in this area?

In the case of Emma Place, property owners were charged equally approximately \$20,000 for the overall cost of installing water and sewer system. Details of their costs and various payment plans are set out in Council Paper, "Hahei Water and wastewater extension target rate paper dated 12 April 2019. See attached copy. We note they were required to pay a development charge.

It would be very helpful to know if the cost of the Wigmore Stream sewage collection system would be similar to Emma Place so that each property owner pays a similar amount i.e. $80 \times \$20,000 = \$1.6m$

5.1.1.2 Cost Following Sewage Plant Expansion

Once the Wigmore Stream collection system is built, the treatment plant and collection system would have to be expanded considerably. Who pays for plant expansion? All property owners in Hahei or just new connections? How will costs be shared?

5.1.1.3 Existing On-Site Connection Options

All properties owners except undeveloped sections have sewage treatment plants of some form. They may be septic tanks or approved on site treatment plants. In the case of Emma Place, it would appear that TCDC compelled each resident to pay an identical amount irrespective of their onsite treatment plant or if it was an empty section. Do you propose adopting the same policy for the Hahei wide sewage scheme?

How do you propose owners dispose of (or not) their existing sewage treatment plants?

5.1.2 On Going User Charges

Once sewers are completed, we understand each property will pay standard user charges. These are currently

7. Targeted rates for wastewater disposal

Targeted rates for wastewater disposal of fixed amounts set per separately used or inhabited part (SUIP) of a rating unit for residential rating units, and based on the number of water closets and urinals in each part for all differential categories other than residential, which are connected, and per rating unit where rating units are capable of being connected to a council wastewater scheme but not connected.

Section 16(3)(b) and (4)(b)

Differential rating classification	Targeted rate
Residential	\$839.02 per SUIP
Non-residential uses – 1 water closet/urinal	\$839.02 per water closet/urinal
Non-residential uses - > 1 water closet/urinal, including the first	\$419.51 per water closet/urinal
Service available but not connected	\$629.26 per rating unit

Please confirm this is correct.

Please provide details of how commercial properties are charged.

5.2 Target Areas

We expect that the community will support prioritising area adjacent to Wigmore Stream. In addition, high priority should be given to Tutaritari Stream area. If TCDC goes ahead with the upgrade of the toilet at beach carpark, then this could be integrated into the upgrade.

5.3 Stormwater Management

One of reasons for investing sewage treatment in Hahei is protect water quality in the Wigmore Stream and Tutaritari Stream. While run off from septic tanks may be causing a decline in water quality, storm water and other unmanaged flows into these small streams are probably contributors to poor stream water quality. If we are to invest in a sewage scheme, then we need a firm commitment from TCDC/WRC to management all storm water flows in Hahei and surrounding catchment areas.

5.4 Sewage Treatment Plant Options

Without rough costs and how these would be allocated to ratepayers, it is difficult to comment on the various options described in the report. Our initial comments however are

- Since it would appear retention time in ponds constrains plant throughput, we would like to know cost/feasibility of enlarging ponds.
- Some people would like to relocate the treatment plant. Please comment on cost/feasibility of this idea.
- There is absolutely no interest in discharging wastewater into the sea. We recommend you remove this option from the FS.

6 Monitoring Program

To establish a firm basis for developing the water and sewage system, we recommend TCDC undertakes a monitoring program over each summer season. This could run from 1 December to April 30, and would focus on the following

- **Effect of Tourist Numbers** – Try and establish relationship between visitors to Hahei and water demand and sewage volumes. For instance, we could establish number of people actually staying in Hahei, number of people walking to Cathedral Cove and related these numbers to water/sewage loads
- **Commercial Area Water/Wastewater Flows** – check these to see if they are disproportionately high over the summer period
- **Leakage** – check water leakage
- **Wigmore and Tutaritari Contamination** – measure E Coli and Enterococci in stream and establish source of contamination. Is it properties, local drains, or farmland run-off?

7 Hahei Based Project Development and Implementation Team

To ensure the project moves ahead smoothly, we strongly recommend that we create a Hahei based project team. The team would include Hahei properties owners, TCDC and qualified advisers. There would be regular public meetings in Hahei, and newsletter issued regularly to non-residents. The whole community must be regularly informed of progress and any disputes resolve quickly.

We would like to discuss this concept with you.

Thank you for inviting us to comment on the Draft Harrison & Grierson Feasibility Study.

We look forward to working with you to develop a water and sewage systems that is supported by our community.

Yours faithfully



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Chair of Hahei Beach Ratepayers Association