

FRIENDS of Banks Peninsula Inc.

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Submission to Environment Canterbury Long Term Plan

From: Friends of Banks Peninsula

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Organisation role: Community Environment Society

Friends of Banks Peninsula has been Akaroa's Community Environment Society for 27 years. The Society has been involved with the issues around Akaroa Wastewater for many years, and was a key participant in the recent consultation carried out by Christchurch City over land-based disposal options.

We are concerned about the amount and quality of wastewater (treated and untreated) entering our environment from Christchurch City Council owned facilities and would like to see Environment Canterbury taking a more hands-on approach to its role in monitoring breaches.

Akaroa Wastewater Monitoring

We were shocked to learn from the City Council that until June 2017 the wastewater flow through the Akaroa treatment plant was measured by a single meter, thereby creating a single point of failure. This only came to light when the Council publicly acknowledged that this flow meter was faulty and the proposed replacement treatment plant that had been granted consented by ECAN and the land based disposal systems it was publicly consulting on were consequently undersized by more than 50%. Equally shocking was the statement from the Council that this meter had not been calibrated since 2009

The Council has more recently stated in response to the Friends of Banks Peninsula's request for historical data, that the check done in 2009 cannot be considered reliable and they have no idea of when this meter was installed or when the fault might have developed.

The faulty meter has therefore provided the basis of consent compliance on flow levels for the Akaroa Treatment Plant for 10 or more years. We are concerned that ECAN as the compliance authority has:

- a. Allowed a monitoring system for a substantial wastewater treatment plant to be based on flow data from a single meter only
- b. Not required evidence from the Council that this single meter was calibrated and checked on a regular basis
- c. Not cross-checked that the flow readings tallied with the seasonal population trends in Akaroa (it was apparent to us the first time we saw the data that the flow readings in summer were not reflective of the population peak)

Further, we understand from the Christchurch City Council Wastewater Treatment Plant Annual Reports (2011-2016/17) that the Akaroa treatment plant has been regularly breaching consent conditions since 2011: median faecal coliforms have exceeded limits for around a month every summer since 2014; median faecal coliforms in the receiving environment have exceeded trigger levels (typically in summer) every year since 2011; total suspended solids exceeded consent levels for around six months of each of the last two years.

We are unaware that any penalties have been imposed on Christchurch City Council for any of these breaches.

Public Toilets on Banks Peninsula

We were also shocked when work by local residents in French Farm, following on from numerous complaints to the City Council about the smell from the public toilets and the sheer numbers of freedom campers, revealed that the septic tank under those toilets was overflowing into the nearby culvert and straight out to sea.

This was the result of a series of errors by the Christchurch City Council. First it erected a new toilet superstructure on the site of the existing toilet block without checking whether the septic tank below was functioning. The new toilet block included a campervan waste dump. Then as a result of the popularity of the French Farm foreshore with freedom campers due to the toilet block and waste dump, it designated the area as a suitable site for non-self-contained freedom camping in its first Freedom Camping by-law. The result was a horrific overuse of these toilets, with over 100 campers per night using a septic tank system that had received no proper monitoring maintenance.

The Council subsequently closed the toilets and shut down the freedom camping area, but in the meantime, we estimate 800,000l of raw sewage had entered Akaroa harbour. This estimate is based on the water meter supplying the toilets during the period when freedom camping was taking place there. Again, we question what sort of compliance monitoring ECAN has been doing to:

- a. Allow a public toilet block to be upgraded including a campervan waste disposal onto an existing, old and very limited capacity septic tank
- b. Fail to test the effluent flows from public toilets where there is a rapidly escalating use.

Since then the Council has engaged Beca to produce an assessment of public toilets on Banks Peninsula¹. This indicates that the French Farm toilets are not an isolated case. A similar situation exists at Le Bons Bay where a new toilet block has been built over an old septic tank (and in this case had the stormwater from the building directed into it) and there are failing public toilets at Wainui, Le Bons Bay, Little Akaloa and Stoddart Point. The Beca report estimates the capacity of these septic tanks systems as:

- French Farm 23 people per day
- Wainui 19 people per day
- Le Bons Bay Little Akaloa 10 people per day
- Stoddart Point 29 people per day
- Wainui 19 people per day

The report has advised the Council that industry best practice is that such septic tanks should not be emptied more than once every 3 years to allow anaerobic micro-organisms that drive the biodegradation time to establish in the sludge zones, and that the quality of treatment can be compromised if a septic tank is frequently pumped out.

We are now aware that the Council has reopened several of the closed toilets, including at French Farm and Stoddart Point on the basis that they will be pumped six monthly.

Redress requested

The Friends of Banks Peninsula request that ECAN step up the level of compliance monitoring that it is doing of the Christchurch City Council wastewater systems and public toilets on Banks Peninsula. We do not consider that ECAN is carrying out its monitoring and compliance functions adequately by relying solely on the reporting done by the City Council, because this has clearly lead to a substantial number of serious breaches going undetected.

We are particularly concerned that, if some form of land-based wastewater disposal is adopted for Akaroa's wastewater, we would currently have no confidence that the quality of the water being discharged is safe.

¹ Beca, "Banks Peninsula Public Toilets Assessment Report". Prepared for Christchurch City Council June 2017

Further we note that the Christchurch City Council LTP states that it has prioritised other matters over wastewater work and expects to experience more network overflows as a result. This on top of the level of compliance failure is not acceptable and we expect ECAN to step up and monitor wastewater to ensure that consent conditions are met.

We wish to be heard in Christchurch in support of our submission