

Comments on Matawii Water Storage Reservoir, Kaikohe, a listed project under the COVID-19 Recovery (Fast-track Consenting) Act 2020

Application Name:	<i>Matawii Water Storage Reservoir, Kaikohe</i>
EPA Reference:	FTC000016
Applicant:	<i>Te Tai Tokerau Water Trust</i>
Comments due by:	21 September 2020
Accessing the application:	The Matawii Water Storage Reservoir Fast-track application can be accessed here : https://www.epa.govt.nz/fast-track-consenting/listed-projects/matawii-water-storage-reservoir/application/

To comment on the Matawii Water Storage Reservoir application using the form below, please fill in the details and:

- **Email** the form to matawiifasttrack@epa.govt.nz
Please mark in the subject line: “Comments on Matawii Fast Track Application (Your name/organisation)”; or
- **Post** the form to Matawii Fast-track Application, Environmental Protection Authority, Private Bag 63002, Waterloo Quay, Wellington 6140. Please ensure adequate time is given for the form to be received in time; or
- **Deliver in person** to Environmental Protection Authority, Grant Thornton House, Level 10, 215 Lambton Quay, Wellington. Please note that due to potential changes in COVID-19 Alert Levels our reception may not be open to the public. We suggest phoning ahead to check.

Comments must be received by the EPA, on behalf of the Panel, on 21 September 2020.

If your comment is not received by the EPA on 21 September 2020 the Panel is not required to consider your comment (although it may decide to). Under the COVID-19 Recovery (Fast-track Consenting) Act 2020 there is no right to seek a waiver of the time limit.

If you are an iwi authority you may share the consent application with hapū whose rohe is in the project area in the application, and choose to include comments from the hapū with any comments you may wish to provide.

Important information

Your personal information will be held by the EPA and used in relation to the Matawii Water Storage Reservoir application process. You have the right to access and correct personal information held by the EPA. A copy of your comments, including all personal information, will be provided to the Matawii Expert Consenting Panel and the applicant.

All comments received on the application will be available on the EPA website.

If you are a company making comments on this application, your full business contact details will be publicly available. For individuals, your name and any information you provide may be publicly available. Your contact details (phone number, address, and email) will not be publicly available.

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All information held by the EPA is subject to the Official Information Act 1982.

Comment on the Matawii Water Storage Reservoir, Kaikohe, Fast-track Application

Please complete all parts of this form

The Matawii Water Storage Reservoir, Kaikohe, Fast-track application can be accessed here

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant):	Ara Poutama Aotearoa the Department of Corrections		
First name:	Andrea		
Last name:	Millar		
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2. We will email you draft conditions of consent for your comment about this application.

<https://www.epa.govt.nz/fast-track-consenting/listed-projects/matawii-water-storage-reservoir/application/>



I can receive emails and my email address is correct



I cannot receive emails and my postal address is correct.

3. Please provide your comments on the Matawii Water Storage Reservoir, Kaihohe Fast-track Application

Ara Poutama Aotearoa the Department of Corrections (“the Department”) operates and manages the Northland Region Corrections Facility (“NRCF”) which is located off State Highway 12; north of Ngawha Springs and east of Kaihohe.

NRCF is specifically identified in the Regional Policy Statement for Northland as a piece of “Regionally Significant Infrastructure”.

NRCF was established in 2005, and accommodates more than 600 men on a minimum to high security basis. The facility obtains its water supply from the Far North District Council’s (“FNDC”) municipal network, known in the local context as the Kaihohe Water Supply Scheme. Water is used on-site for typical domestic purposes (drinking, washing, cleaning etc.), as well as to supplement horticultural activities that form part of the prisoner rehabilitation programmes that are run at the facility.

The Department understands that the Matawii Water Storage Reservoir project would provide increased raw supply for the Kaihohe Water Supply Scheme. This is supported by the Department, particularly given the context of the recent drought conditions in Northland, which impacted water supply to NRCF. Further, the Department supports greater water resilience in the Northland region in general.

The Department’s interest in the project relates to management procedures were a failure of the reservoir and/or associated infrastructure to occur. The application material, including the “Potential Impact Classification” assessment in Appendix M, indicates that the NRCF site itself would not be subject to any impact in a failure event. However, the Potential Impact Classification assessment identifies that infrastructure that services and accesses NRCF would be subject to damage in a failure event, including State Highway 12 which would be “*likely to be damaged significantly due to significant overtopping of road.*”¹ The assessment goes on to identify that the time to restore operation to infrastructure would be “*up to three months*”², and the community recovery time would take “*months*”.³

Being a significant piece of infrastructure, accommodating vulnerable people (as well as staff) on-site on a “24/7” basis, it is essential that NRCF would be able to be accessed and serviced in a reservoir failure event. Evacuation of the facility would be a highly difficult proposition, therefore the Department needs to be satisfied that emergency protocols associated with the reservoir take account of the specific needs of the NRCF.

In this regard, it is noted that the application does not include any specific proposed emergency management conditions (in Appendix K), other than a requirement for a Construction Management Plan to include environmental emergency response procedures, which would then be required to be certified by the Northland Regional Council (as per proposed conditions 4 and 5). The application itself states that:

*“The detailed design process will confirm whether or not the High PIC applies and will address dam safety management and emergency planning. Through detailed design, specific mitigation measures that complete dam failure is minimised will be identified and overall effect is minor.”*⁴

The Department is concerned that it would not get an opportunity to review or provide feedback on the emergency response procedures at the Council certification stage, with the way that the proposed conditions have been

¹ “Potential Impact Classification Matawii Water Storage Reservoir, Kaihohe”, report reference 190272-B (Issue 0.2), dated 8 July 2020, Table 2

² Ibid, Table 3

³ Ibid, Table 5

⁴ “Fast-Track Consent Applications To Construct & Operate a Water Reservoir, Kaihohe, Te Tai Tokerau Water Trust”, report reference WWLA0156 Rev. 6, dated August 2020, page 89

drafted in Appendix K. Therefore, **the Department's position is that the resource consent conditions should require the applicant to engage with the Department following the completion of detailed design, to address emergency planning requirements in relation to NRCF.**

The Department welcomes further engagement with the applicant and/or Expert Consenting Panel to resolve its concerns in relation to emergency planning.

Thank you for your comments