# St Lukes Environmental Protection Society Incorporated (STEPS)

# Annual budget 2017-18 – Strategic Spend on Stormwater

Submitters: STEPS

### Objectives:

- Auckland Council to focus and "ringfence" the strategic spend on Auckland stormwater and waterways, in areas with combined sewers
- Auckland Council needs a strategic and long term view of how stormwater will be managed in conjunction with sewage plans. Funding for this strategic plan needs to begin immediately in this year's annual budget 2017-18
- To ensure community engagement by Healthy Waters particularly with community groups in the isthmus areas with combined sewers in relation to this strategic plan. STEPS wishes to be consulted by Auckland Council during the upcoming strategic review and the annual planning process.

### **Key Points**

The Auckland Council 2017-18 annual plan does not address means by which to manage the ongoing combined sewer overflows and flooding that routinely occur on Auckland streets and in Auckland's waterways. Combined sewer overflows are outdated legacy assets which Auckland Council has failed to upgrade or even deal with.

STEPS expects as a basic principle that Council will ensure the critical functions of Auckland's streams, wetlands and aquifers are treated on a par with the volcanic and coastal environments of which they are an integral part. This means stormwater and road runoff must be dealt with in an environmentally and societally responsible way – most likely locally and at source.

'Healthy Waters' (formerly Stormwater) appear to be relying on the Watercare Central Interceptor sewerage project as a 'solution' for Meola stormwater overflows and associated unhealthy water. This is contrary to statements by Watercare, which has no statutory responsibility for stormwater. (See Watercare asset management plan in Background below).

Furthermore, Watercare has advised STEPS that at best, the Central Interceptor project might reduce the number of overflow events from 80-100 per year, down to perhaps 10. But the large overflow events will still occur. See photos of Meola flooding at <a href="http://www.meolacreek.org.nz/2017/03/16/meola-in-flood-11-12-march-2017/">http://www.meolacreek.org.nz/2017/03/16/meola-in-flood-11-12-march-2017/</a>

It appears to STEPS, that Healthy Waters is planning to continue using Meola Creek as a receiving environment for sewage and road pollutants for the indefinite future, with no plan other than the Watercare Central Interceptor in place.

The Local Government Act requires Councils to have a plan for all its infrastructure. For stormwater and sewage in the combined sewer areas of Auckland there is no visible plan. STEPS has been told in the past by Auckland Council Stormwater that Auckland Council has abandoned the separation of stormwater from sewage. The Auckland plan strategic direction completely ignores combined sewers (see Background below). In the absence of a plan stormwater overflows can only be expected to continue indefinitely.

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In addition, we have no evidence that Auckland Transport is undertaking any action to address its contribution to stormwater runoff. We understand that roads managed by AT are the source of 48% of all stormwater.

There appears to be a major disconnect between three arms of Council on the subject of stormwater (Auckland Council Healthy Waters, WCS and AT) while our streets are routinely flooded, and streams routinely contaminated by runoff and sewage overflows.

We have seen no evidence to suggest that appropriate measurements have been done to prove that the water table will not drop further when areas reliant on soakage (such as Mt Albert) are intensified. Already our creeks are so low as to threaten the lives of eels and other aquatic fauna. (See <a href="http://www.meolacreek.org.nz/2017/02/26/waititiko-tuna-eels-in-meola-creek-2017/">http://www.meolacreek.org.nz/2017/02/26/waititiko-tuna-eels-in-meola-creek-2017/</a>). The doubling of impermeable areas such as carparks and roofs in a district reliant on soakage can in our view only diminish the aquifer and creek. Where has the modelling been published to show impacts of intensification on the aquifer?

While we support the Strategic review of "Healthy Waters" that has been initiated, (see Background below) we believe the 2018 timeframe for the Stormwater report to be presented is too late. Stormwater and sewerage infrastructure funding provisions are needed (along with transport and housing) to allow a workable implementation of the intensification Government and Auckland Council want. Now is the time for Auckland Council to seek long term infrastructure provisions from Government BEFORE the election. A report in 2018 will be too late for all political parties, and yet another opportunity to address Auckland isthmus' failing stormwater infrastructure will have been lost.

#### Recommendations:

- 1) Budget is needed in 2017-18 to update and republish the Three Waters Strategy showing the strategic plan for Auckland's water infrastructure, especially storm water.
- 2) STEPS wishes to see Council develop a policy as a matter of urgency. The Stormwater strategy must be developed jointly this year, by Auckland Council, Watercare and Auckland Transport since all are integrally involved in creating or managing stormwater. Provision for this must be made explicitly in the current Annual Plan.
- 3) Stormwater and sewerage infrastructure funding provisions are needed to allow a workable implementation of the intensification Government and Auckland Council want. Now is the time for Auckland Council to seek long term infrastructure provisions from Government before the general election.
- 4) Engage STEPS and other similar groups who are affected by stormwater in both the annual plan and the strategic review of Stormwater. Please include STEPS in your consultation process and confirm receipt of this submission.

#### Background:

• The Foreword by the Chief Executive of Watercare Services in the Watercare Asset Management Plan 2016 to 2036 p3 is evidence of a disconnect between Watercare and Auckland Council

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"Watercare's proposed Central Interceptor is being provided to enable growth in the central and southern areas of Auckland and also provides an interim solution to stormwater issues, providing time for <u>Auckland Council</u> to construct adequate stormwater infrastructure to service the area. Continued reliance on the wastewater system for the collection and treatment of stormwater is not sustainable for a growing and liveable city. [See <a href="https://www.watercare.co.nz/SiteCollectionDocuments/AllPDFs/Watercare-Asset-Management-Plan-2016-2036.pdf">https://www.watercare.co.nz/SiteCollectionDocuments/AllPDFs/Watercare-Asset-Management-Plan-2016-2036.pdf</a> ]

• The statement in Ch 12 the Auckland Plan:

"Reduce wet weather overflows to an average of no more than two events per discharge location per annum, where the stormwater and wastewater systems are separated, by 2040 (with priority given to bathing beaches and other sensitive receiving environments by 2030)"

completely omits mention of the direction for the many COMBINED SEWER areas. As a strategic direction it omits the fact that you cannot have clean beaches while sewage and road pollutants continue to enter waterways upstream.

Auckland Council strategic review of "Healthy Waters" – please see
http://www.nzherald.co.nz/nz/news/article.cfm?c\_id=1&objectid=11819717

At the root of these problems is the need for developers and homeowners to practice Water Sensitive Design. So what is the progress here? Why is it not mandatory in areas with no stormwater infrastructure? How successful is the compliance arm of Healthy Waters in achieving best practice?

Natural Environmental Sustainability Measures of Water Quality and Ecosystem Health must be robust and in tune with the situation on the ground and the strategy. How do we know whether the Stormwater budget of \$81 million Cap-ex and \$99 million Op-Ex in 2016-17 is adequate or not, in the absence of transparency and strategic focus?

Auckland Council must enhance and make more visible regular measures both positive and negative –

- How many developments truly use water sensitive design?
- How many kilometres of stream are piped each year and how many are daylighted?
- How much is the permeable surface area changing in each stream catchment each year?
- How many overflows occur? Where and why?
- How clean are our creeks?
- What measures of progress show steps towards reduction of overflows?

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