**Submission to Application number DIS60069613 - Auckland Council region-wide stormwater network**

**Name of Submitter: [Name of your organisation]**

**1.0 Background**

[Name of your organisation] was formed to represent the viewpoints of a number of community groups on a range of water quality issues in [name your locality] and its surrounding areas. Stormwater is one of those issues. It directly affects our community and has a major impact on our local environment.

The importance of this issue to our community meant that in 2017 we became a member of the “Stop Auckland Sewage Overflows Coalition” (SASOC) organisation.

The effects of stormwater on receiving waters in the Auckland isthmus (local streams, aquifers, estuaries and marine environments of the Waitemata and Manukau Harbours) are of particular relevance to our community.

Our areas of concern include the effects of intensification of the built area on, and the role of the old combined stormwater/wastewater system in, stormwater quantity and quality.

**2.0 Submission**

This submission OPPOSES THE APPLICATION IN WHOLE.

The submission covers all aspects of the application.

**3.0 Reasons for submission**

Our community recognises that the regional stormwater network is a public asset. However as with any asset, this needs regular ongoing maintenance and upgrading to new standards. We believe that this has been patchy in the past, and this has caused major problems within our community and its environment.

Our community has identified a number of key issues that form the reasons for our submission:

**3.1 Asset management**

As one of the older parts of Auckland City, our stormwater network is largely a mix of a combined stormwater/wastewater system and separated stormwater systems. Whether this is maintained regularly or meets modern standards is a major concern.

**3.2 Effects of growth**

Our local area is one of the most densely populated urban areas in the country. On top of this the Auckland Council is encouraging increased intensification. This growth will further stress on already old and failing stormwater systems in the Auckland isthmus.

**3.3 Flooding effects**

Localised areas can be flooded after rainfall by the blockages or other failures of the stormwater or combined pipe systems.

**3.4 Stream health**

The stormwater system collects and regularly discharges contaminants into our freshwater environment, even outside rain events. [Give specific name(s)] catchment areas and streams are major concerns where regular contamination has led to Council putting up permanent contaminant warning signage.

**3.5 Coastal health**

The coastal environment along the margins of the Waitemata Harbour receives stormwater outflows from various catchments. The inability to swim at various beaches within a minimum of 48 hours of rainfall is a direct consequence of these outflows, while the effects on shellfish, fish and the local marine environment are largely unknown.

**3.6 Groundwater**

In areas where ground soakage is used as a surrogate for a piped stormwater system, this can lead to localised surface flooding due to inadequate capacity of soakage systems.

3**.7 Effects on the wastewater network**

The stormwater system in our community has the added complexity of being partly a combined wastewater and stormwater system operated by Watercare. This complicates responsibilities for maintenance and monitoring, and could lead to potential duplication or abdication of responsibilities. Stormwater also overloads the combined system leading to regular discharges of wastewater to our local environment.

**3.8 Effects on aquifers**

There are areas where ground soakage is used to dispose of untreated stormwater. Untreated stormwater, especially in areas of heavy traffic, contains contaminants (heavy metals, hydrocarbons, chemicals and general rubbish). No assessment of the long term effects on the aquifers of these contaminants has been made.

**4.0** **Decisions and amendments Auckland Council should make**

[Name of your organisation] is not expert in managing stormwater networks. We are well aware that it is a community asset and that the Auckland Council manages the stormwater network on our behalf and at our cost.

However, we do experience the negative effects of the present stormwater network on our environment.

We are also aware that the public stormwater network is a part of the wider stormwater networks including those operated by Watercare (part of the Auckland Council), Auckland Transport (part of the Auckland Council), NZTA, and private owners.

The following list of decisions and amendments the Council should make is not exhaustive and we see a role for our organisation to work with Auckland Council to refine any consent prior to it being considered for approval:

**4.1 Asset management**

4.1.1 A regular review of the priorities for works to achieve agreed community and environmental outcomes.

4.1.2 A timed programme of works to achieve network priorities and agreed outcomes.

4.1.3 A defined budget or targeted rate to achieve agreed water quality and water quantity outcomes.

**4.2 Effects of growth**

4.2.1 An urgent review of the effects of intensification on stormwater quantity and quality with a view to requiring mitigation on any future developments.

4.2.2 A requirement to avoid the increased stormwater peak volumes caused by intensification.

**4.3 Flooding effects**

4.3.1 A requirement to reduce flood peaks (public and private sources) contributing to the stormwater system.

**4.4 Stream health**

4.4.1 A requirement to avoid inflows (public and private public and private sources) of contaminated stormwater.

4.4.2 A requirement to treat contaminated stormwater prior to discharge to the general and freshwater environment to enable contact recreation and to protect aquifers and the freshwater environment.

 4.4.3 A requirement to monitor and publicly report performance.

**4.5 Coastal health**

 4.5.1  A requirement to avoid inflows of contaminated stormwater.

4.5.2 A requirement to treat contaminated stormwater prior to discharge to the coastal and marine environment to enable contact recreation and to protect the marine environment.

 4.5.3  A requirement to monitor and publicly report performance.

**4.6 Groundwater**

 4.6.1 A requirement to avoid excessive stormwater quantities entering groundwater.

4.6.2 A requirement to avoid inflows of contaminated stormwater.

 4.6.3 A requirement to treat contaminated stormwater prior to discharge to groundwater.

 4.6.4 A requirement to monitor and publicly report performance.

**4.7 Effects on the wastewater network**

4.7.1 Inclusion of Watercare and other stormwater network owners in the ongoing programmes to upgrade and manage the stormwater network.

4.7.2 A requirement to avoid cross connection between stormwater and wastewater systems.

4.7.3 A requirement to reduce the amount of stormwater entering the combined sewer system.

**4.8 Ongoing management**

 4.8.1 A community role in ongoing management of the stormwater network.

 4.8.2 All proposed consent conditions should be practical, measurable and enforceable.

**5.0 Conclusion**

The proposed Auckland stormwater network consent directly effects our community’s environment through both quality and quantity issues. Now is the opportunity to reset the future direction of the stormwater infrastructure through a well-structured consenting process.

**5.1 Remedy sought by [your organisation’s name]**

5.1.1 Establish a long-term strategy to address the actions that need to be taken by Council and relevant CCO’s to resolve the issues surrounding the whole failure of the current stormwater/wastewater network. Actions that will stop the existing unacceptable discharge of pollution into Auckland harbour waters.

5.1.2 That strategy will:

* Define the target timeframe for remediation of the network e.g. 20-30 years.
* Detail the steps that will have to be taken to ensure the credibility of the target and timeframe:
	+ Funding – annual and long-term provision.
	+ A broad definition of the necessary work required defining and detailing the implementation stages.
* Outline the consultation process and plan to ensure local communities agree with and engage with the strategy.
* Ensure a firm commitment by Auckland Council (Watercare and Healthy Waters) to implement the strategy. This will involve a process whereby Council will provide regular progress reports to agreed community representatives (SASOC and agreed local groups) to provide the confidence that the target can be achieved.

**5.2 Position taken by [your organisation’s name] on application**

Until our concerns are addressed, we oppose the granting of the consent.

[Name(s) of authorised signatory]

On behalf of [Name of your organisation].

[Your organisation’s postal address]

[Contact person’s phone number]

[xx] March 2018