



THE MANUKAU HARBOUR RESTORATION SOCIETY

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SUBMISSION TO AUCKLAND COUNCIL REGION-WIDE STORMWATER NETWORK CONSENT (DIS60069613)

1. The Manukau Harbour Restoration Society Inc wishes to make a submission opposing the resource consent application made by Auckland Council (Application DIS60069613) for a Region-Wide Stormwater Network Consent.
2. The traditional approach to urban development in Auckland has been to alter the landscape from permeable vegetated surfaces to a series of impervious surfaces, such as roads, yards and roofs. This results in large quantities of stormwater runoff, requiring management. Moreover in many of our older suburbs we do not have a separate stormwater system but rather combined stormwater and wastewater systems. We have treated stormwater runoff as a nuisance and focused on piped systems that rapidly convey stormwater directly to streams or the coast, or in the case of combined systems, to wastewater treatment plants. In these systems, heavy rainfall flows rapidly into streams or to the coast carrying pollutants and sediments washed off impervious surfaces, resulting in elevated concentrations of pollutants, nutrients and suspended solids. In combined systems, overflows following heavy rainfall also flow into streams or to the coast carrying raw sewage and untreated stormwater. This results in many of our beaches being unsafe for swimming after heavy rain, and some being permanently closed.
3. In our view, Auckland must move to become a Water Sensitive City to address these problems and follow the principles of water sensitive design (WSD), which is considered best practice for stormwater management. Using the traditional approaches of the past will only exacerbate the problem as Auckland intensifies development within its urban areas and adds new urban areas.
4. In greenfield situations, WSD directs development to appropriate areas of a catchment, and provides for intensified or clustered development in these locations to minimise land disturbance and earthworks. The result is an effective balance of protected and enhanced natural environments to manage stormwater and associated ecosystem services to support the proposed development.
5. In a brownfield situation, WSD promotes the integration of ecosystem services into the existing built form to manage stormwater. Reconstruction of buildings can be

congregated within the site to provide space to retrofit natural ecosystem services. These opportunities may include the construction of raingardens, living roofs and swales, mass tree planting, remediation of existing or contaminated soils, rehabilitation of watercourses and wetlands, and stream daylighting.

6. Our opposition to the resource consent application for a Region-Wide Stormwater Network Consent is focused on Schedule 2 of the Consent, which sets out the Auckland Stormwater NDC Strategic Objectives, Outcomes and Six Yearly Targets. We wish to see the consent demonstrate that Auckland is moving to become a Water Sensitive City. The consent must: promote inter-disciplinary planning and design; protect and enhance the values and functions of natural ecosystems; address stormwater effects as close to source as possible; and mimic natural systems and processes for stormwater management. We believe that only if Auckland adopts such an approach will it reduce over time the damage to our streams and the Manukau and Waitemata Harbour that is caused by stormwater currently. We believe that at the end of 35 years, the consent should have resulted in fewer degraded streams in Auckland, less flooding of public and private properties and an increased number of swimmable beaches in our harbours.

The proposal

7. The proposal involves the diversion and discharge of existing and future Auckland Council stormwater.

The Submitter

8. The MHRS was established in 2011 to provide a community group with a “whole of harbour” perspective to drive education and implement programs to address serious environmental issues affecting New Zealand’s 2nd largest harbour. The Manukau Harbour has been subject to serious mismanagement and consequential environmental impacts over the past 100 years. The broad aims of the society are to represent all communities and organisations that border on or are influenced by the Manukau Harbour; to restore the Harbour back to its original water quality and environmental state; and in so doing, enhance the harbour as a recreational, transportation and well managed asset, loved by residents of Auckland.

Reasons for submissions

9. We say that this consent must support Auckland moving in the direction of becoming a Water Sensitive City. It must also ensure Auckland complies with Policy 23(4) of the New Zealand Coastal Policy Statement to manage discharges of stormwater to avoid the adverse effects to the coastal environment. It must reflect the principles of water sensitive design, essential in supporting the vision of the Auckland Plan for Auckland to become the ‘world’s most liveable city’ and reducing the damage to property, streams and harbours caused by stormwater. It is essential that these principles be adopted as Auckland enters a period of significant infill development on the central isthmus as well as green field development on its outskirts. It must also meet the provisions of the Hauraki Gulf Marine Park Act 2000.
10. MHRS recognises that the regional stormwater network is a public asset. Overall, the consent must incorporate a WSD approach, including the principles of WSD, to:
 - Promote inter-disciplinary planning and design;
 - Protect and enhance the values and functions of natural ecosystems;
 - Address stormwater effects as close to source as possible; and
 - Mimic natural systems and processes for stormwater management.

11. Of significance in terms of the consent is schedule 2, which sets out the Auckland Stormwater NDC Strategic Objectives, Outcomes and Six Yearly Targets. Our Association has identified a number of key issues that we believe must be amended in the Consent and especially schedule 2:

Assets: The first objective of this aspect of the Consent is to ensure risk to Auckland's communities, including people, property and infrastructure is reduced – and that risk to people and property is managed to levels that have been established in consultation with the community, and to reduce existing flood risk where it is above these levels. The second is to ensure that stream, groundwater and coastal water values are maintained and enhanced and communities are connected with them, utilising streams, aquifers and harbours as integral natural components of Auckland's stormwater system while reducing the adverse effects of stormwater runoff on, and enhancing the community's connection with its waterways.

We ask that this aspect of the Consent be amended to:

- Ensure that the consent includes targets to separate the legacy stormwater and wastewater networks, and ensure this separation follows WSD, creating a stormwater network independent of the wastewater system.

Growth: The objective of this aspect of the Consent is to enable growth through water sensitive development and the provision of quality stormwater infrastructure, and that new and re-developed areas are supported by effective stormwater management and that good quality infrastructure and development is undertaken in a way that meets the needs of Auckland's communities and maintains and enhances natural water systems.

We ask that this aspect of the Consent be amended to:

- Clearly ensure that re-developed areas (especially those facing intensification) will maximise water sensitive design in their developments, especially in the western isthmus.¹ Our concern is that these developments will rely on the central interceptor alone for the management of stormwater, leading to ongoing flooding and discharges from combined storm and wastewater overflow pipes and bypasses from the Mangere Wastewater Treatment Plant into the Manukau Harbour.
- Clearly ensure that this Consent does not encourage the central interceptor becoming the sole means of addressing stormwater management in the western isthmus and this resulting in increasing bypasses from the Mangere Wastewater Treatment Plant.

Flooding: The objective of this aspect of the Consent is to ensure risk to Auckland's communities, including people, property and infrastructure is reduced – and that risk to people and property is managed to levels that have been established in consultation with the community, and reduce existing flood risk where it is above these levels.

We ask that this aspect of the Consent be amended to:

- Ensure that the asset management targets and performance standards to be met incorporate a WSD approach and the principles of WSD to address flooding; and that specific targets be incorporated to reduce areas of flooding particularly in the vicinity of the Manukau Harbour.

Stream Health: The objective of this aspect of the Consent is to ensure that stream, groundwater and coastal water values are maintained and enhanced and communities are connected with them, utilising streams, aquifers and harbours as integral natural components of Auckland's stormwater system while reducing the adverse effects of stormwater runoff on, and enhancing our community's connection with, its waterways.

We ask that this aspect of the Consent be amended to:

- Ensure that the consent incorporates a WSD approach to protect, enhance and restore the values and functions of natural streams and/or provide for stormwater management to mimic natural stream systems and processes; and that specific

¹ See Schedule 2, Auckland Stormwater NDC Strategic Objectives, Outcomes and Six yearly targets, Proposed Conditions of Consent.

targets be set to reduce the number of points and volume of stormwater overflows into streams and harbours.

Coastal Health: The objective of this aspect of the Consent is again to ensure that stream, groundwater and coastal water values are maintained and enhanced and communities are connected with them, utilising streams, aquifers and harbours as integral natural components of Auckland's stormwater system while reducing the adverse effects of stormwater runoff on, and enhancing our community's connection with, its waterways.

We ask that this aspect of the Consent be amended to:

- Ensure that the consent clearly manages discharges of stormwater to avoid adverse effects on the coastal environment, by: (a) avoiding where practicable and otherwise remedying cross contamination of sewage and stormwater systems; (b) reducing contaminant and sediment loadings in stormwater at source, through contaminant treatment and by controls on land use activities; (c) promoting integrated management of catchments and stormwater networks; and (d) promoting design options that reduce flows to stormwater reticulation systems at source; and (e) reducing the number of overflow points and the volume of stormwater flows into streams and harbours.
- Ensure that the consent meets the requirements of the Hauraki Gulf Marine Park Act 2000.

Groundwater: The objective of this aspect of the Consent is again to ensure that stream, groundwater and coastal water values are maintained and enhanced and communities are connected with them, utilising streams, aquifers and harbours as integral natural components of Auckland's stormwater system while reducing the adverse effects of stormwater runoff on, and enhancing our community's connection with, its waterways.

We ask that this aspect of the Consent be amended to:

- Ensure that the consent clearly incorporates a WSD approach to protect, enhance and restore groundwater systems, including, for example, by protecting and remediating porous soils to improve groundwater infiltration and treating stormwater before it enters groundwater systems.

Effects on Wastewater System: The objective of this aspect of the Consent is again to ensure that stream, groundwater and coastal water values are maintained and enhanced and communities are connected with them, utilising streams, aquifers and harbours as integral natural components of Auckland's stormwater system while reducing the adverse effects of stormwater runoff on, and enhancing our community's connection with, its waterways.

We ask that this aspect of the Consent be amended to:

- Clarify that the consent will manage effects on the wastewater network, by remedying cross contamination of sewage and stormwater systems.

Common to all Issues: The objectives of this aspect of the Consent are to ensure stakeholders are engaged to achieve the best stormwater outcomes; to ensure the benefits from limited resources are maximised by targeting priorities to achieve the best outcomes; and robust systems, processes, practices and management are implemented.

We ask that this aspect of the Consent be amended to:

- Recognise concerns MHRS holds that the governance structure of Auckland Council does not clearly separate the regulator of the consent from the operator of the stormwater network. To remedy this, we ask for the Consent to be amended to require the establishment of an Auckland Services Performance Auditor appointed by the Minister of Local Government as a Condition of the Consent, with an annual budget set at 1% of the operational budget of Healthy Waters to undertake the tasks in the Consent currently identified for the Auckland Council 'Manager'.

RMA Part 2 matters and overall adverse effects

12. Overall, we believe the social, economic, health and safety and wellbeing of people and communities generally under Part 2 of the RMA will not be provided for by this application.

Decision sought from the Council

13. We seek the following decisions from the Council:
- (a) That the resource consent sought be declined;
 - (b) Alternatively, in the event the Council decides to grant the resource consent, that appropriate conditions be imposed to avoid, remedy or mitigate the adverse effects of the application; and
 - (c) Such alternative or other relief or other consequential amendments considered appropriate or necessary to address the concerns set out in this submission.
14. We wish to be heard at the council planning hearing in support of its submission.
15. We are not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.
16. If others make a similar submission, we will consider presenting a joint case with them at a hearing. In particular, MHRS supports the submissions of SASOC, STEPS and Friends of Oakley Cr.



Signature of submitter

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