

Long Term Plan 2018-28 Submissions Overview – Stormwater

Issue 4 – Do we really want better waterways? – Dealing with stormwater to improve our environment

The Consultation Document proposes the following 3 options, with Council indicating a preference for Option 2 – Spreading out the stormwater work and cost of a medium 10-15 year period.

1 Do it quick - complete stormwater work by 2025

Complete the work required by 2025, starting in 2018/19. This would involve speeding up the preparation of stormwater management plans and the implementation of infrastructure improvements. A focus to meet the requirements would be treatment at end

discharge points – those points where stormwater enters waterways (there is over 100 of these). This option has high capital and maintenance costs due to the complex treatment options required and challenges with land availability at end discharge points.

2 Spread it out - spread stormwater work and cost over a medium 10-15 year period

Complete the work required over 10 to 15 years (medium term) starting 2018/19 that would mean completion would occur within the expected life of the area stormwater discharge consent. This would involve achieving all of that suggested in Option 1, but with the ability to identify better options to treat, capture and slow down stormwater at source, such as swales, bunds, raingardens and filtration areas.

This would mean less treatment required at end discharge points, with reduced complexity and maintenance costs.

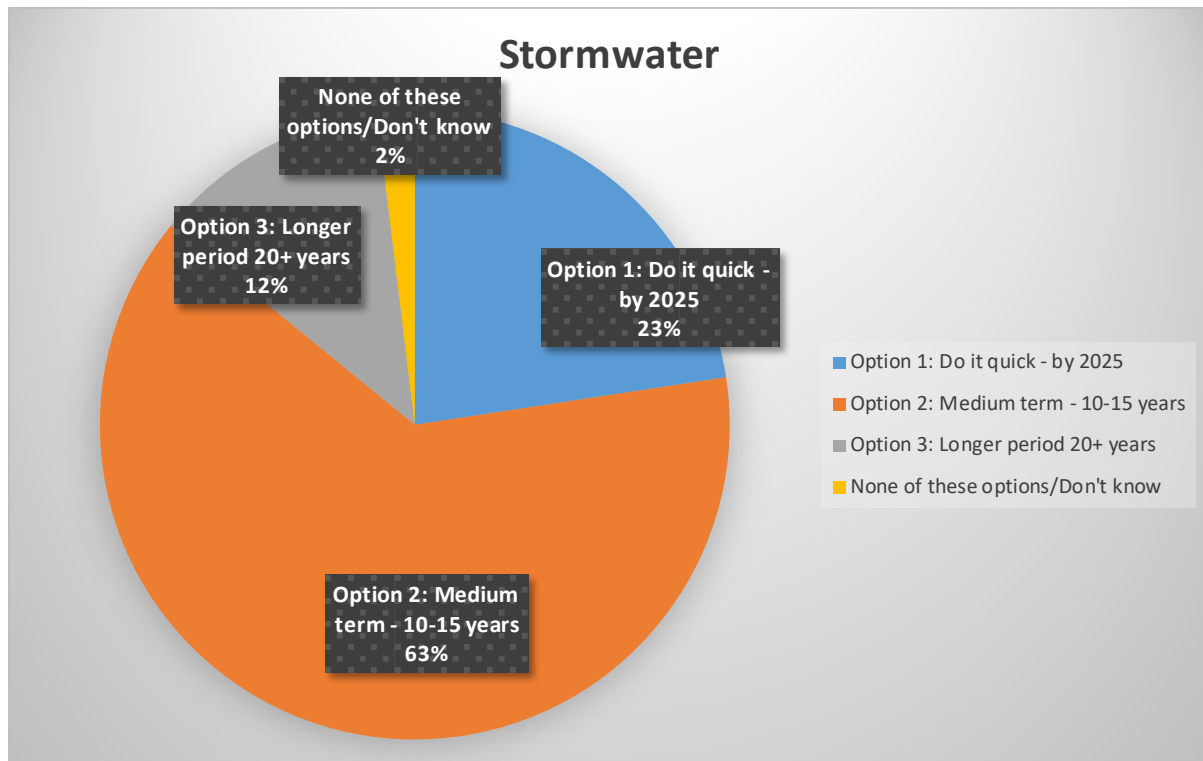
This option has the advantages of achieving some real improvements to the quality of our waterways, while spreading the cost, and as a result, reducing the impact on rates increases.

3 Take more time - spread stormwater work and cost over a longer period 20+ years

Complete the work required over 20+ years (long term), starting in 2018/19 to spread the cost over more generations of ratepayers and reduce the overall impact. Again, this would involve doing all of that suggested in Option 2, but over a longer timeframe.

Options 2 and 3 mean that we may be out of step with regional council and central government policies and regulations. We would achieve our community responsibilities to improve the quality of stormwater discharged into our local waterways, as well as reducing the potential damage to property and infrastructure from flooding, but over a longer timeframe.

518 submitters responded to this question – with preferences indicated in the graph below:



Overview

- 1 The majority of submitters supported Option 2 – the medium term implementation of stormwater work.
- 2 A number of the comments indicated that this appeared to be the best balance between improving stormwater treatment to enhance the quality of our waterways, and spreading the cost for ratepayers. Another consideration was the medium term option would be more likely to allow the Council to benefit from technology developments to enable better stormwater solutions.
- 3 *“To me this option is best balances cost issues with the need to address this issue in a timely manner, as well as taking advantage of any technological advances.”*
- 4 *“A sensible compromise that sees the work done without massive spending in the short term.”*
- 5 Many of those supporting Option 1 - implementation over a shorter timeframe favoured this option because they consider improving water quality is a high priority environmental issue that the district needs to be addressing, and note the increase in extreme weather events that place stress on existing infrastructure. They also favoured improving the management of stormwater to reduce the potential impact of flooding.
- 6 *“Ensuring the cleanest water goes back into the environment is important.”*
- 7 *“With the increasing rate of climate change issues, weather is going to have a big impact on the city's ability to function especially if stormwater is going to constantly cause major flooding for low lying areas. “*

- 8 *“Flooding of property regularly occurs during heavy rainfall current stormwater facilities inadequate. Local streams a quick option to help their water quality. Swales and rain gardens are a really good way to go where they are applicable.*
- 9 At the other end of the spectrum the supporters of Option 3 - taking more time to implement, expressed views that the work should not be rushed, and that the cost implications for ratepayers need to be considered.
- 10 *“The infrastructure isn't adequate but is not feasible to be achieved by 2025”*
- 11 *“Improvement of infrastructure needs to be manageable financially.”*

Schools Feedback - Summary

The table indicates the option selected by the majority of students:

School	Option 1 Do it quick	Option 2 Spread it out	Option 3 Take more time
Geraldine High School		✓	
Timaru Boys High School		✓	
Opihi College		✓	
Craighead		✓	
Mountainview High School		✓	
Timaru Girls High School	✓	✓	
Roncalli College		✓	

Key points:

- Rather see this done before the Theatre as believe this would help the community more
- With more flooding now need to fix problem areas first
- Delaying might mean can take advantage of new technology
- Have consultation with residents before draw up plans as they know about problems in their street
- Look at options for reusing stormwater
- It's likely contaminants will get worse
- Can't leave it too long as need to deal with contaminants
- Bit concerned that TDC hasn't got on to this before now
- Short Term – too much for ratepayers
- We need to improve how we filter and hold stormwater

Topics/Sub-topics for Officer Comment (from Submitter Comments)

1) Specific priority/flooding areas (identified in 27 submissions)

Officer comment:

- 12 Council has an approved overarching Stormwater Strategy in place. During the preparation of the Stormwater Management Plan (SMP) for each catchment, all issues will be identified and addressed. A range of information sources will be used to identify issues for specific sites, such as service requests, submissions to this LTP and staff knowledge. All sites identified by submitters will be referred to the process for preparing the SMPs.

2) Impact of climate change (identified in 11 submissions)

Officer comment:

- 13 Climate change is having an impact on the existing stormwater networks. Increasing rainfall intensities are resulting in a decrease in the level of service that the networks are providing, for example a 1 in 10 year rain event may become a 1 in 7 year event, and therefore the network might experience overflows of a greater frequency than previously.
- 14 The increasing rainfall intensities means that the design standards are evolving and are being updated as new information becomes available. The requirement for new development areas to provide attenuation infrastructure protects existing networks to some degree, however the planning for new infrastructure needs to be undertaken in the knowledge that environmental factors are changing.
- 15 In addition, SMPs will also provide information to the District Plan Review which will promote and encourage green infrastructure implementation in any new development, in order to provide better resilience to climate change and improved stormwater treatment quality outcomes.

3) High Priority project (identified in 29 submissions)

Officer comment:

- 16 Implementing stormwater improvements in a shorter timeframe is not necessarily an efficient spend of rate money. The Consultation Document explains the reasons for this, which in summary revolve around taking time to find and implement the best solution, which may be incorporated with other bigger project upgrades, as compared to implementing proprietary type solutions, which would be identified and installed with haste. Not completing all upgrade work as quickly as possible is not an indication of a lack of commitment, but more a desire to get the best outcome.

4) Environmental Focus (identified in 13 submissions)

Officer comment:

- 17 The SMP will identify a range of options to deal with both quality and quantity of the stormwater prior to discharging into the receiving environment. There is a clear preference for options that are environmentally sustainable and cost effective. The key focus is to implement options that result in an improvement of the receiving environment. The SMPs form the basis of the required discharge consents that will be subject to Regional Council approval.

5) Not a priority/slower implementation (identified in 6 submissions)

Officer comment:

- 18 While some submitters believe that stormwater attenuation and treatment is not necessarily a high priority for Council, the Canterbury Land and Water Regional Plan must be given consideration. Although the proposed timeframe for implementing these stormwater discharge improvements may not match current requirements of the Regional Council policy, the intent is to make appropriate improvements at a measured acceptable rate, and not to leave the implementation timeframe open-ended.

6) Community education/involvement (identified in 4 submissions)

Officer comment:

- 19 One of the four key themes of Councils approved overarching Stormwater Strategy is education. Once Council has approved a timeframe for stormwater improvements identified in the Long Term Plan, then a detailed implementation plan will be developed covering all aspects of this important issue. Education initiatives will be included in the implementation plan and will need to be undertaken in conjunction with and have the support of other stakeholders such as Iwi and Ecan.

7) Stormwater treatment detail (identified in 14 submissions)

Officer comment:

- 20 As noted above, a range of options are available to deal with both quality and quantity of the stormwater prior to discharging into the receiving environment. There is a preference for options that are environmentally sustainable and cost effective. 'Green' infrastructure or low impact design systems such as swales, wetlands and rain gardens are key components of stormwater treatments. Stormwater treatment and attenuation are required currently to any new development to ensure it is aligned with the SMP objectives.

8) LWRP/Regional Council timeframes (identified in 5 submissions)

Officer comment:

- 21 The Canterbury Land and Water Regional Plan (LWRP) contains multiple objectives and policies with respect to stormwater. It is understood that all objectives and policies as a whole are taken into account when processing resource consents. The Timaru District Council has made a submission to the Orari Temuka Opihi Pareora Zone Implementation Plan Addendum (OTOP ZIPA) requesting that timeframes for implementation of the LWRP in the OTOP Zone be extended. At the time of preparation of this report decisions on the OTOP ZIPA had not been considered by the Regional Council.
- 22 Although the proposed timeframe for implementing these stormwater discharge improvements may not match the current requirement of part of Regional policy, Council's commitment is to make appropriate improvements at a measured rate. Of note is the Regional Council's submission, which states that they note our consultation points on improving stormwater management and will be happy to work alongside Council on this matter. The Regional Council also acknowledge the importance of consideration of the community's feedback on this matter.

9) Project Implementation planning (identified in 16 submissions)

Officer comment:

- 23 Council has identified Option Two in the Consultation Document as the preferred option for the following reasons:
- Better affordability and sustainability for the Timaru District community.
 - Provides time to better understand each catchments hydrology.
 - Creates an opportunity to use new technologies.
 - Manageable in terms of resourcing and timing.
 - More opportunities to coordinate projects with other agencies.
- 24 It is proposed that an implementation plan will be prepared once Council has determined which option will be implemented.

10) Rainwater/Stormwater harvesting (identified in 6 submissions)

Officer comment:

- 25 The possible harvesting of rainwater for reuse within properties is not currently contained within any statutory mechanism to ensure it does happen. As this matter is generally related to land use, it is appropriate to consider the controls around rainwater harvesting and reuse within the scope of the District Plan regulatory environment. Given that the District Plan is currently in the review stage, it is suggested that a discussion paper be prepared on this subject. The discussion paper would include discussion on the benefits of rainwater harvesting and reuse at both the landowner level and at the stormwater system level.

11) New developments – stormwater planning & financial contributions (identified in 6 submissions)

Officer comment:

- 26 All new developments are required to provide stormwater treatment and attenuation to ensure SMP objectives are achieved. Requirements to meet certain standards will also be a consideration in the District Plan Review, along with the establishment of stormwater design guidelines for developments. The strengthening of the protection of overland flowpaths for stormwater in excess of the network should also be considered in the District Plan Review.
- 27 Financial contributions are currently a mechanism for implementing and funding on an equitable basis area wide stormwater treatment and conveyance systems for developments which cover multiple land owners, such as the Gleniti stormwater system consisting of swales and retention basins.
- 28 Farming practices in regards to stormwater discharging into receiving water bodies are a Regional Council responsibility.

12) Impact on rates (identified in 7 submissions)

Officer comment:

- 29 Council considered affordability and the impact on rates when it determined that Option Two was to be the preferred option. This option has been included in the draft Long Term Plan and budget, and while affordability has a different meaning within different sectors of the community the suggested \$15m spend over 15 years is reasonably pragmatic in order to achieve better stormwater outcomes. The costs of stormwater are recovered as a community rate based on land value.

13) Technology developments (identified in 9 submissions)

Officer comment:

- 30 Technology advances do provide opportunities to generate improved environmental outcomes and staff keep an open mind when searching for solutions. A high priority is to make sure each project provides good value for money and contains a degree of future proofing.

14) Current infrastructure maintenance (identified in 2 submissions)

Officer comment:

- 31 It is acknowledged that there are a number of issues within the existing stormwater networks. Some relate to network maintenance and can be readily resolved while others relate to capacity issues which are much more complicated to address.

15) Collaboration (identified in 3 submissions)

Officer comment:

- 32 Council encourages collaboration with all interested parties in relation to improving outcomes associated with stormwater management. Council is an active participant in the catchment groups throughout the district, and in particular the Waitarakao and Saltwater Creek groups. Council also welcomes the Regional Council submission to work alongside Council and the offer of staff to provide advice and assistance on how we improve water quality outcomes in the Timaru District Council stormwater network. Collaboration has the potential to provide benefits in the sharing of information, technical resources, concepts, educational programmes and documentation. Staff are members of the Water NZ Stormwater Group and also actively participate in the Stormwater Management Group that reports to the Canterbury Mayoral Forum. These collaboration forums are beneficial and allow staff to keep abreast of current trends in stormwater management.