

**Richard Mabon**

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**From:**  
**Sent:** Sunday, 18 September 2022 16:42  
**To:** ADC Submissions  
**Subject:** Ashburton Citizens Association - Submission to the Draft Stormwater Bylaw

Kia Ora ACA Submission,

**RE: Submission to the Draft Stormwater Bylaw**

**(1) Do you agree with our proposals to protect the stormwater network (clauses 5.1 to 5.6)?**

**YES** – the Ashburton Citizens Association agree with the proposals to protect the stormwater network.

**We also ask that Ashburton District Council add two additional principles,**

- (a) Standardise the Crossing Blocks – e.g. Dunedin City Council has a very clear policy defining form style, in an effort to encourage uniformity and best practice network.

[Vehicle crossings - Dunedin City Council](#)

- (b) Would also like to see Ashburton District Council have more stormwater grates to catch litter and stormwater contaminants
- (c) As rainfall patterns increase, ensure that stormwater network is fit for purpose and potentially capacity is increased / decreased if necessary

**(2) Do you agree with our proposals to manage applications to discharge to the stormwater network (clauses 6.1 to 6.4)?**

**YES** – the Ashburton Citizens Association agree with the proposals to manage applications to discharge to the stormwater network.

**(3) Do you agree with our proposals to manage stormwater discharge from non-residential Sites (clauses 7.1 to 7.3)?**

**YES** – the Ashburton Citizens Association agree with the proposals to manage stormwater discharge from non-residential Sites

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**Name:** Donna Favel  
**Organisation:** Ashburton Citizens Association

**YES:** - Ashburton Citizens Association would like to present to the hearing on **Wednesday 28 September 2022**

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**(4) Do you agree with our proposed rules for earthworks (clause 8.1)?**

**YES** – the Ashburton Citizens Association agree with the proposed rules for earthworks

(5) **Do you agree with our proposals for maintenance of private stormwater systems (clauses 9.1 to 9.2)?**

**YES** – the Ashburton Citizens Association agree with the proposals for maintenance of private stormwater systems

(6) **Do you agree with our proposed penalties for breaches of the Bylaw (clauses 11.1 to 11.5)?**

**YES** – the Ashburton Citizens Association agree with the proposed breaches of the Bylaw (clauses 11.1 to 11.5) **and** request that Ashburton District Council introduce penalties for non compliant driveway access, which interrupts the flow of Stormwater (as per 5.1.1).

(7) **Do you have any other comments on the draft Bylaw?**

Ashburton Citizens Association request that Ashburton District Council ensure that the network is well maintained and fit for purpose. For Example cnr Cass & Wills Streets –

- (a) When the stormwater drains were installed outside ATEC / Cinema – the consultant expressed concern that the small underground gutters would not cope with a **moderate** rainfall storm – yet it was too late – the drains were installed and “signed off”. Yet, every time, as predicted, **moderate** rainfall storm occurs – we have observed drains over flowing and such water pressure flowing into Cass Street – that the flooding flows onto the road.
- (b) That network is cleaned of organic matter and regularly and flushed. Another example from the same location – the small drains outside ATEC / Cinema – were commissioned in 2006. Yet in 2021 – the drains were holding silt and little plants growing in the drains. Being under cover of the grates, they had never been cleaned – by the time the contractors came and cleaned approximately 100m of underground drains – took three staff – two days and four trailers of waste matter.
- (c) The Bylaw is silent on reducing flow into the storm water system. We read with interest and support the suggestion from Antony White that ***“I would rather see emphasis placed on grey water systems and collection of water off roofs for use in gardens (and grey water systems) even if consented by Council. This will take pressure off the water network during droughts, plus potentially collect some excess water during floods. Some industrial sites are high users of water, why not encourage and incentivise the design (including new and retro-fitted) to incorporate water tanks to collect runoff, with the relevant filter systems to take pressure off and our drinkable water supply?”***
- (d) When it first opened Ashburton District Council required that household in Geoff Geering Drive have a sustainability clause. Encourage ADC to ensure that future subdivisions require Grey Water.
- (e) Deep Gutters to be covered – Firstly, these are a H & S issue – as older residents vision starts to fail, some are no longer eligible to hold a licence and transition from Motor Vehicles to Mobility Scooters, for which no eyesight test nor licence are required. One incident witnessed by aa Ashburton Citizens Association member was a mobility scooter must have expected the gutter to be flat and instead drove over a deep gutter, landing face first on the road with a scooter atop of them. Secondly, deep gutters are susceptible to carrying more rubbish in them and contaminating water ways
- (f) The overall maintenance of the Stormwater system is lacking in some areas and a well maintained system would be appreciated by ratepayers.
- (g) We read with interest Auckland City Council encouraging rainwater collection

[Council makes it easier for Aucklanders to collect rainwater - OurAuckland \(aucklandcouncil.govt.nz\)](https://aucklandcouncil.govt.nz) (see inserted below)

Auckland Council has announced it is scrapping resource consent fees for the installation of rainwater tanks at residential properties.



The fee waiver comes in response to the severe water shortages the region is currently experiencing. Other measures to incentivise residential rainwater collection are also being considered by the council, including removing the current consenting requirements for rain tanks in residential zones through a change to the Auckland Unitary Plan, and making water tanks a requirement for new developments.

Mayor Phil Goff says household rainwater tanks can play an important role in Auckland's overall water conservation, and the change is long overdue.

"It makes sense to capture the rainwater that falls on our roofs, ease the pressure of sudden downpours on our stormwater system and utilize the water for things like watering the garden and washing the car.

***"As we face the worst drought in our history, using rainwater also eases the demand on our water supplies. Our lakes are currently only 44 per cent full when they would normally be at 78 per cent."***

"With continued drier than usual weather predicted for winter and spring, we need to look at every option for supplementing our water supply to offset a critical shortage of water this summer.

"If only one per cent of Auckland's urban households were to use a rainwater tank in the winter seasons to cover their entire non-potable requirements this could equate to approximately one million litres per day of water over winter being served by rain tanks instead of Auckland's dams," Phil Goff says.



Tank size, water usage in the household, household occupant numbers and seasonal rainfall will impact the degree to which rainwater tanks can contribute to household water supply, so naturally these variants would need to be considered before choosing a tank.

The initiative is supported by a new 'Do I need a Consent?' tool for rainwater tanks, launched on the Auckland Council website, that walks people through the consenting process and provides basic compliance advice.

Planning Committee chair, Councillor Chris Darby, says "This is the right time of year for people to install a tank, when rainfall is traditionally at its highest, so Auckland Council has streamlined the process to encourage the installation of as many tanks as possible in homes across Auckland.



“Rainwater tanks don’t just retain a supply of water for toilet flushing, laundry use and outside taps, they also detain rainfall during extreme rainfall events to alleviate flooding. Using rainwater rather than reticulated water comes with a price incentive of lower water supply charges as well as lower volumetric wastewater charges.



The financial benefits and environmental benefits combined with the streamlined process make installing a rainwater tank more attractive than ever,” he said.

Residents taking advantage of the resource consent fee waiver to install a tank will still need to comply with resource, building and health and safety codes, and use licensed installation professionals where required. Qualifying criteria will be provided on the Auckland Council website.

Under Auckland’s Unitary Plan, resource consent is often required when installing domestic tanks to ensure they meet development standards such as its proximity to a boundary, and if a tank is to be connected to internal plumbing to use for toilet flushing or laundry use a building consent is also needed.

However, some tanks for external water use are exempt from needing a building consent to install, depending on their capacity, and structural requirements. A full list of these exemptions can be found on the Auckland Council website.

The usual processing period for consents will still apply, but the ‘Do I need a Consent?’ tool for rainwater tanks will help residents understand and assess their own situation, so they can have their plans in place prior to submitting their application, streamlining the process and reducing unnecessary delays.

**(8) Do you have any other comments on the draft Bylaw?**

Council changed footpath seal some time added of additional benefit of recharging groundwater. Should be routine maintenance. Partially to reduce cost of resealing

In closing the Ashburton Citizens Association to thank the Ashburton District Council firstly for the shift to close this submissions on a Sunday and secondly for the opportunity to submit and speak to this submission.

Donna Favel

Secretary of the Ashburton Citizens Association

