

MANGAKOTUKUTUKU STREAM CARE GROUP SUBMISSION ON DRAFT WASTE MANAGEMENT PLAN

Our comments are focused on the stormwater part of the draft plan.

Areas of support

1. We support the 'Fish on drains' programme, and believe it should be extended to neighbourhood storm drains that go into streams, giving priority to catchments or sub-catchments where existing ecological values are highest. Streams have their own ecological values and waste put into streams ends up in the river.
2. We endorse the primary aim to preserve the natural flow regimes during and after development; this should be stated as a clear objective for Hamilton. This should be a requirement for new developments and achieved at the property level using sustainable urban design methods. Failing that, it should be achieved by the use of retention ponds outside of the stream channel.
3. We support dealing with stormwater on-site by means of rainwater tanks, rain gardens, soak holes, etc. to help delay flood flows. This needs to be implemented through policy and plans for new developments and through incentives for retrofitting existing properties, e.g., rebates for water tanks. These measures would also help meet water conservation goals.
4. Demonstration programmes are good and should be expanded and used on a broader scale (such as for the Peacockes Structure Plan).

Areas of concern

1. We object to the presumption that the streams are part of the stormwater system, rather than habitat for aquatic life. Within the plan, the stormwater system seems to end at the Waikato River rather than at the end of the pipe. Streams are receiving environments with ecological values that require protection.
2. The plan should clearly acknowledge ecological values of streams. In addition to managing bank erosion and flow of contaminants into the Waikato, stormwater should also be managed to maintain habitats and reduce contaminants in the streams. Streams are important for maintaining biodiversity in the city.
3. Methods to achieve stormwater objectives should include retrofitting stormwater management to existing developments to improve water and habitat quality, and reduce peak flows. This could include daylighting streams that have been piped, or replacing impervious surfaces with soft-engineering options (e.g., swales on car parks).
4. In addition to running workshops on best management practices for minimising sediment movement from construction sites to stormwater, regional and city councils should be taking more action on enforcement and monitoring of sites.
5. An objective should be added to the plan to avoid or minimise contaminant runoff through stormwater (e.g. hydrocarbons from roads and zinc from roofs).

6. The draft plan does not explicitly mention stormwater from commercial or industrial properties, where peak flows and contaminants are generally worst. These areas need to be specifically targeted for monitoring and remediation.
7. The plan lacks details and clear objectives. It is also short on specific methods for implementing the objectives that are included. The proposed actions are not adequate to achieve the primary aims.
8. The proposed budget is inadequate and does not reflect the significance of the problem.