



# MANGAKOTUKUTUKU STREAM CARE GROUP

15 May 2015

Free Post 172189  
10 Year Plan Submission  
Hamilton City Council  
Private Bag 3010  
Hamilton 3240

Dear Sir/Madam

## **HCC Proposed 2015-25 LTP Submission**

Please accept this as a submission on the HCC LTP.

### **Background to Mangakotukutuku Stream Care Group (MSCG)**

The MSCG has a membership of over 70 individuals who have been active for the past 8 years and have undertaken and are involved with a number of projects to further our objectives, including;

- a) The establishment of 23,000+ native plants at multiple sites throughout the catchment and maintaining the lower reaches of the Mangakotukutuku Stream/Sandford Park area to restore indigenous riparian vegetation.
- b) The development of a wetland and in-stream fish habitat structures within the lower Mangakotukutuku Stream /Sandford Park area (with 2014 re-introduction of the threatened Black Mudfish species to this wetland).
- c) Submissions to HCC notified processes, including the Three Waters Strategy, Variation 14 - Peacocke Structure Plan, HCC Annual Plan, Waste Management Plan, the Peacockes Area Urban Strategy, Sothern Links Project and the Proposed District Plan.

The value of the work committed and undertaken by the MSCG currently is estimated to exceed \$600,000. More information about our group can be found on our website.

The Mangakotukutuku Stream (originating west of Hamilton and flowing into the Waikato River – refer to attached map) contains a number of significant and threatened indigenous fish species and the associated gullies provide important habitat for a number of other indigenous species (eg long tailed bats and Tui).

The Mangakotukutuku Stream gully also includes a number of important existing and proposed open space recreational assets with the longer term vision of the HCC (as set out within the Peacockes Structure Plan, current and proposed District Plan) to have extensive walkway and cycle paths linking almost the entire Peacockes branch of the Mangakotukutuku Stream gully network, when fully developed in the coming decades.



### **Purchase/Acquisition of Strategic Gully Reserve Areas**

The HCC current and Proposed District Plan envisages that the Mangakotukutuku Stream and its gullies become significant 'open space areas' containing walking and cycling tracks, linking existing parks with future reserves and forming important community and recreational linkages, particularly as development proceeds into the Peacockes sub-catchment of the Mangakotukutuku Stream (refer to attached HCC planning maps).

The LTP Infrastructure Strategy (p14) states as follows - *GREENFIELD OR NEW GROWTH AREAS: Priority 1 - Development will first occur in: Rototuna and Peacocke Stage 1 – continuing development already taking place.*

It is understood that as subdivision/development takes place within the Peacockes area that HCC will add to the gully reserve network as part of anticipated consent processes/development contributions in line with the vision set out within current/proposed HCC planning documents. Indeed HCC's most recent gully reserve addition is an area adjacent to Edgeview Crescent as a result of subdivision development in that area.

However there are a number of privately owned gully properties with no real prospect of further subdivision or development mechanism where the gully area could be 'taken or required' by the HCC and it seems that the most likely scenario is that these areas will be need to be gifted, bought or covenanted for the proposed access linkages in the Peacockes area to be achieved.

These areas are often strategically important or critical to the HCC achieving its long term goal for 'open spaces' within the Peacockes Structures Plan as they typically provide the most practical access route for linking upper and lower gully areas (and in linking existing and proposed reserves together).

We have been in recent discussion with the owner of one of these strategically important gully sections and HCC staff to discuss mutually acceptable options for public ownership and ultimately, restoration from its current weed dominated vegetation to an open space reserve incorporating indigenous vegetation and public access. For reasons of privacy and confidentiality, specific details of that situation are not included within this submission.

The LTP consultation document (p29) proposes '*Purchasing land for future parks and reserves years 1-4, \$1.4M (CE15033)*' - however I understand in discussion with HCC staff that this proposed funding is for particular designated/committed projects and does specifically provide for the purchase of strategic sections of the Mangakotukutuku Stream gully network, such as the one recently identified and as discussed above.

I also understand there to be no specific budget provision to purchase such areas within the next 10 year LTP period and this omission could seriously compromise the long term network of gully reserves envisaged with the current and proposed District Plan as opportunities to secure strategically important Mangakotukutuku Stream gully sections currently or within the next 10 years pass by and these areas may never be available to the HCC in the future.

The MSCG supports flexibility for the re-prioritisation of expenditure within existing proposed LTP budgets to enable the purchase of strategic open space reserve areas outside of currently identified commitments and specifically within the Mangakotukutuku Stream gully network, consistent with the outcomes envisaged by the HCC current and Proposed District Plan.

## HCC Sewer Overflows

The MSCG has obtained data from HCC relating to 35 separate sewer overflows during the 1/4/11 to 31/3/13 period as follows;

<b>Pump Station</b>	<b>Number of Spills 1/4/11 – 31/3/13</b>	<b>Volume spilled m3</b>	<b>Average per spill m3</b>
BRUCE SPS9	2	345	172.5
PINE SPS62	6	25	4.2
SPLITT SPS75	6	508	84.7
SUNNYHILLS SPS94	3	33	11.0
TE ANAU SPS80	4	3945	986.3
COLLINS SPS016	14	5245	374.6
<b>TOTALS</b>	<b>35</b>	<b>10101</b>	<b>288.6</b>

Since the compilation of this data there was a further significant overflow event on 12 June 2014 and another more recently on 18 April 2015. Simplistically, it appears that most overflows are caused by heavy rain, subsequent stormwater infiltration and ingress to the sewer system and the inability of that system to cope with the incoming volumes.

MSCG has met with HCC staff to discuss this issue and understand that there is a long term 30 year plan with significant funding proposed to replace and upgrade infrastructure and that rainfall related spills are trending downwards. We are also aware that \$750k was spent on an upgrade to the Collins Road pump station, the worst offender in the table above, although that site has overflowed in heavy rain twice since that upgrade.

The actual environmental effects of these overflows to the health of the Mangakotukutuku Stream is unknown although the discharge of well in excess of 1M litres from HCC pump stations to the Mangakotukutuku Stream over the past 4 years is clearly repugnant to the objectives and actions of the MSCG to restore stream health. It is also difficult to see how this situation will comply with the RMA 1991 (ie WRC resource consents, National Environmental Standards required for freshwater or the Waikato-Tainui Vision and Strategy for Waikato River, which includes the Mangakotukutuku Stream) anytime soon.

It is noted that in sentencing the Waikato District Council in 2014 for a sewerage spill of 5M litres to the Whaingaroa Harbour that the Court specifically considered that the Council's failure to alert the community seriously aggravated the offending in that case. The public have a right to know about these sewerage spills and the HCC have a duty to tell them as soon as possible after each incident.

We would like to see far more transparency in incident and annual reporting of sewerage spills, including any relevant health warnings, for example during those times where sewerage contaminated floodwaters have covered Sandford Park grassed areas (as it was in June 2014) which are regularly used by walkers, children and their dogs. Such transparency and public reporting is required to gain increased rating support for the upgrades that are required earlier and/or beyond those proposed.

The enormous costs and practical challenges in correcting years of under investment in waste water infrastructure while trying to 'balance the books' currently are however acknowledged.

The LTP consultation document (p29) proposes '*New and upgraded assets - Wet weather sewerage network storage YEARS 1-9, \$30.9M*' – none which is specifically identifiable within the LTP Capital Projects List for 2015-2025 for the Mangakotukutuku stream catchment

The issue of waste water system upgrades is also very briefly discussed on p42 of the LTP infrastructure strategy but contains no detail of where in the city the expenditure or solutions proposed are to occur. It appears from the LTP that some \$4.5-6.5M/yr (capital expenditure line items CE10100 and CE10101) is proposed to be spent on 'waste water asset upgrades', but again it is not clear that any of this work is planned for the system within the Mangakotukutuku Stream catchment.

We request increased expenditure (within the overall budgets proposed) to rectify wet weather overflow issues, increased expenditure in this respect within the Mangakotukutuku Stream catchment system and more commentary within the LTP on areas and timing of proposed upgrades.

### **HCC Plants for Gullies Scheme**

MSCG understand that the 'Plants for Gullies Scheme' for 2015 is at a level of about \$50,000. We strongly support the continuation of this scheme and (as we understand) that longer term funding is also proposed to be sought from the Waikato River Authority to provide some certainty for the scheme's continuation over the next 10 years. There are a number of obvious improvements which could be made to this scheme, including;

- a. Increasing the number of plants available (above the current 50 plant/landowner maximum) in specified circumstances, eg where 2 or more landowners co-operate together, where plantings on private land extend plantings on HCC land, for example.
- b. Promotion of the scheme much earlier each year so that landowners can undertake appropriate site preparation and weed control and/or multi-year approval of landowner proposals subject to satisfactory performance each year.
- c. Targeting of particular areas/gullies to co-ordinate with and maximise benefits of existing gully restoration activities

## Submission Points

### 1. Purchase of future gully reserve areas

- a. The MSCG supports flexibility for the re-prioritisation of expenditure within existing proposed LTP budgets to enable the purchase of strategic open space reserve areas outside of currently identified commitments and specifically within the Mangakotukutuku Stream gully network, consistent with the outcomes envisaged by the HCC current and Proposed District Plan.

### 2. HCC Sewer Overflows

- a. The MSCG request timely and transparent reporting of spills of untreated sewerage to streams within the city and the Waikato River on an incident by incident and summarised annual basis, including data to show trends over time of the number of spills per stream catchment and the Waikato River.
- b. The MSCG request increased expenditure (within the overall budgets proposed) to rectify wet weather overflow issues, increased expenditure in this respect within the Mangakotukutuku Stream catchment system and more commentary and transparency within the LTP on areas and timing of proposed upgrades.

### 3. HCC 'Plants for Gullies' scheme

- a. The MSCG supports the ongoing continuation of the HCC 'Plants for Gullies' scheme, at least at existing levels and to;
  - i. Increase the number of plants available (above the current 50 plant/landowner maximum) in specified circumstances, eg where 2 or more landowners co-operate together, where plantings on private land extend plantings on HCC land, for example.
  - ii. Promote the scheme much earlier each year so that landowners can undertake appropriate site preparation and weed control and provide for multi-year approval of landowner proposals subject to satisfactory performance each year.
  - iii. Target particular areas/gullies to co-ordinate with and maximise benefits of existing gully restoration activities

### Request to be Heard

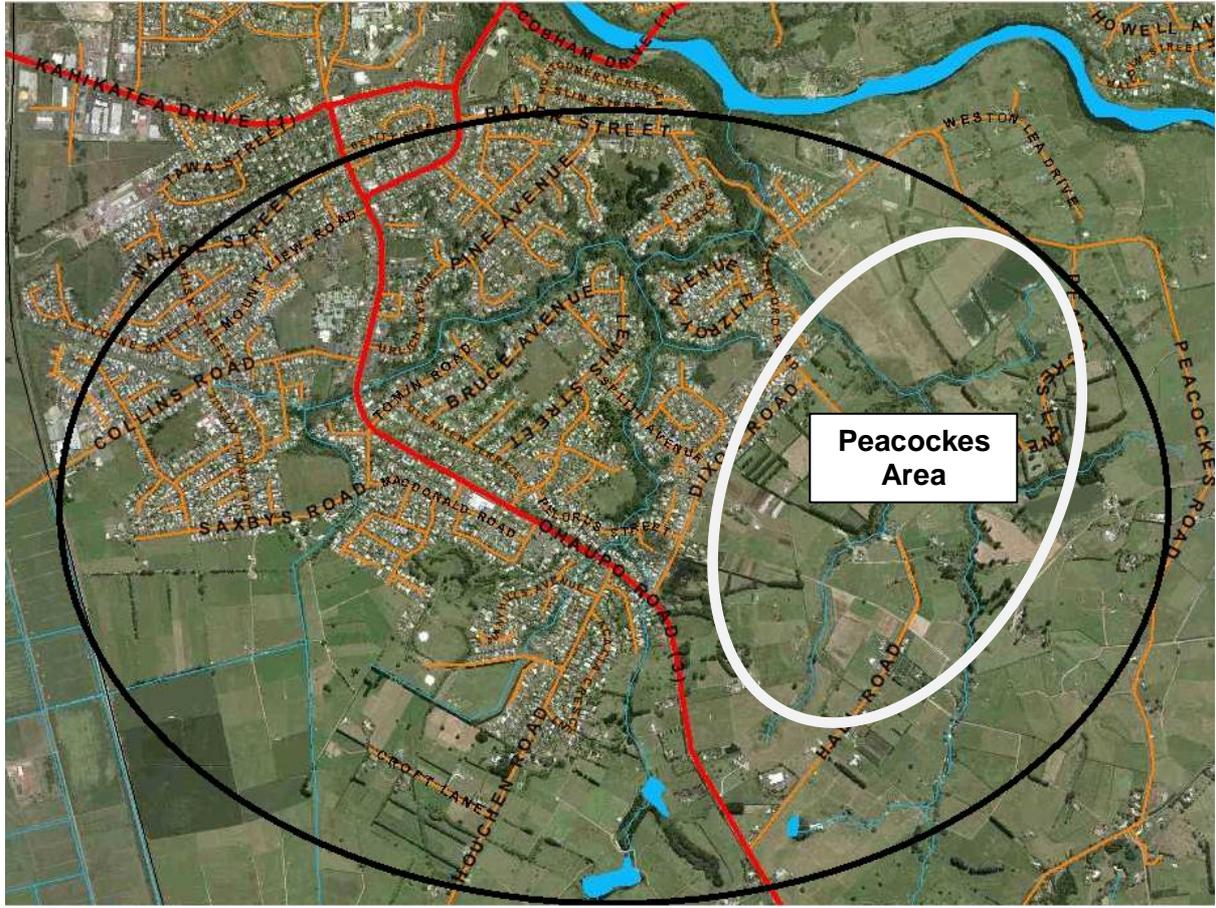
MSCG requests to be heard in support of this submission and is willing to attend any meeting with HCC staff to discuss further or clarify any aspect raised in this submission

Yours faithfully



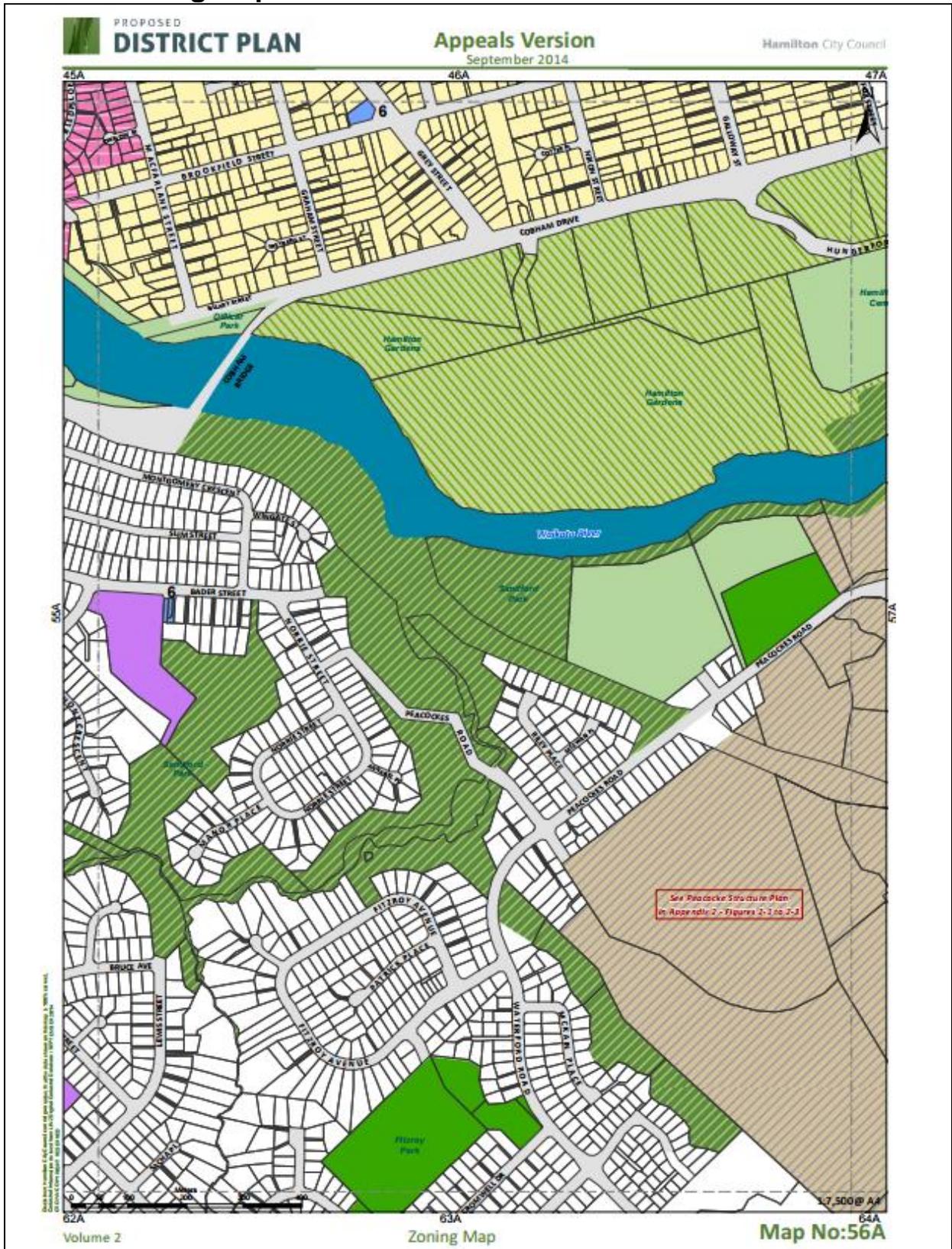
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Mangakotukutuku Stream Catchment – approximately as shown 

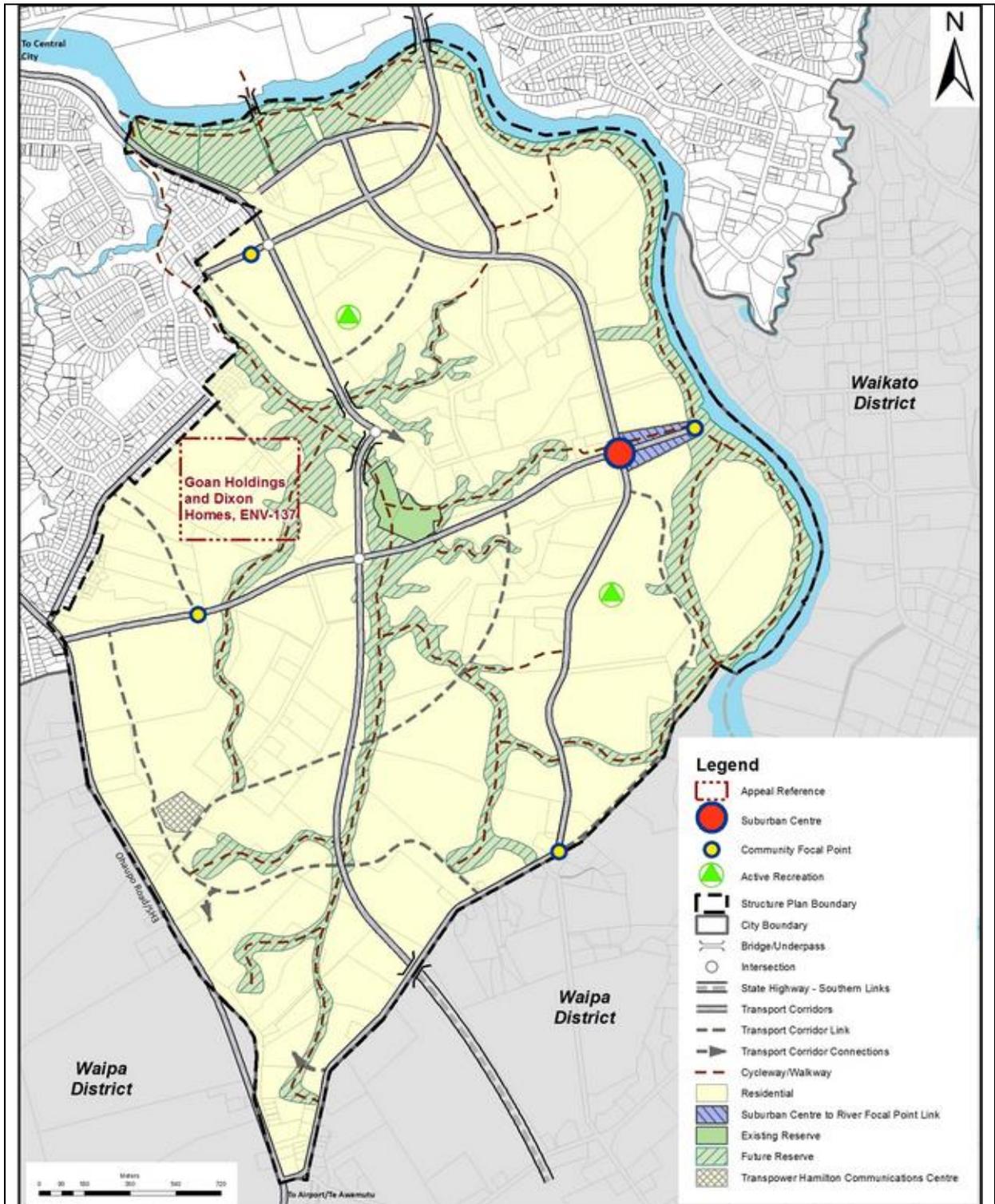


Including the stream and gullies within the Glenview, Melville and Fitzroy Suburbs bounded approximately by the Waikato River to the north, Peacockes Road to the east and extending beyond the Main Trunk Railway Line to the west.

# HCC Planning Maps



NB - Dark green hatched areas are a combination of existing (Sandford Park) and proposed future reserves



HCC Proposed District Plan Figure 2-1: Peacocke Structure Plan – Land Use

NB – Green hatched areas shows some existing but mostly proposed future reserve areas including cycle/walkways linking to Sandford Park and the Waikato River.