

Before the Freshwater Hearing Panel

Under the Resource Management Act 1991 (**RMA**)

In the matter of The Otago Regional Council Proposed Otago Regional Policy Statement 2021 (freshwater planning instrument)

Submission by Dunedin City Council

Summary statement of Zoe Moffat for Dunedin City Council

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INTRODUCTION

- 1 My name is Zoe Aroha Moffat. I am employed by the Dunedin City Council (DCC) as the Planning Manager, 3 Waters. I am here to speak to my evidence on the Freshwater Planning Instrument parts of the proposed Otago Regional Policy Statement 2021 (RPS).

DCC THREE WATERS SYSTEMS OVERVIEW

- 2 The DCC provides drinking water, wastewater and stormwater services to more than 40,000 properties across Dunedin. Customers are serviced by 6 water treatment plants, 7 wastewater treatment plants, and extensive piped infrastructure networks. The DCC's three waters activities are governed by a number of legislative and other obligations and requirements.
- 3 The DCC collects rates for three waters services to fund these services. This is done in accordance with the DCC's Financial Strategy, which recognises the competing tensions of affordability, maintaining assets and investing for the future.
- 4 The DCC has an extensive capital delivery programme to provide new infrastructure, and renew and upgrade existing infrastructure, which requires growing the capability and capacity in the local construction market.

STRATEGIC PLANNING

- 5 Since 2019 the DCC has been undertaking a system-wide strategic planning exercise to inform future investments in its three waters systems. This exercise will inform a co-ordinated strategy that should ensure that the investments are properly prioritised to achieve optimal outcomes from a system-wide point of view, and avoid making investment decisions on a narrow, case-by-case basis.
- 6 This work is being undertaken in partnership with mana whenua, and in consultation with the Otago Regional Council. It is underpinned by objectives that relate to a range of drivers, including levels of service, Te Mana o te Wai, cultural values, affordability, regulatory compliance, environmental outcomes and responding to impacts of climate change and population growth. The strategic planning exercise also incorporates an adaptive planning approach designed to provide flexibility in the DCC's plans, to adjust to changes in the operating environment (including, for example, regulatory and policy changes, changes in community expectations, and climate change).
- 7 The DCC intends to complete the initial adaptive plans in 2024. The plans will inform a co-ordinated strategy and decisions on future investment in Dunedin's three waters systems. These decisions are due to be made during the period from 2024 to 2026.

KEY CHALLENGES

- 8 My evidence identifies several key challenges that the proposed freshwater provisions of the RPS would create for the DCC as three waters service provider. I will summarise these challenges, and Mr Taylor will speak to the planning solutions to address these challenges.

Water allocation provisions should appropriately prioritise community water supplies (LF-FW-P7 / P7A)

- 9 If the RPS provisions create a water allocation framework that doesn't appropriately prioritise allocation for community water supplies, it may become increasingly difficult to provide sufficient drinking water to support the health needs of the people in Dunedin. There could be significant periods of demand shortfall under future consents, where minimum flows and/or

reduced allocations result in consent conditions requiring reduction or ceasing of takes in certain circumstances.

Improvement of the quality of stormwater discharges will take time (LF-FW-P15)

- 10 The draft RPS provisions would require stormwater discharges from the DCC's existing network to not prevent waterways from meeting any applicable water quality standards. Depending on the standards set, it may be difficult for the DCC to achieve this quickly as it is likely to require incremental change over decades.
- 11 This is because the stormwater system is complex and solutions to control contaminant ingress and improve stormwater quality take time, such as changes to land use planning, water sensitive design and education / behaviour changes.
- 12 The DCC is using system-wide, co-ordinated strategic planning to identify the optimal suite of solutions to improve stormwater quality over time.

Reduction in wet weather wastewater overflows will take time and they may sometimes be the best practicable option (LF-FW-P16)

- 13 The draft RPS provisions would require wet weather overflows to not prevent waterways from meeting any applicable water quality standards, and for those direct to freshwater, to be phased out to the 'greatest extent possible'.
- 14 Meeting these policies may not be practicable. While the DCC is working to reduce the frequency and volume of wet weather overflows over time, it is not practicable to eliminate them completely, and any change will be incremental. At times a direct overflow to water may be the best practicable option with the least adverse effects, including environmental and public health impacts. For example, a short-term consequence of removing an overflow point may be wastewater backing up into people's homes or spilling onto land where it is more likely people will come in contact with it, such as public roads. Clearly this needs to be avoided.
- 15 The DCC are identifying the optimal suite of solutions to wet weather overflows by developing a coordinated system-wide strategy. This will ensure progressive system upgrades align with a range of objectives, including those in the RPS, and that the solutions are affordable and deliverable.

Wastewater connections to the reticulated system may come at a significant cost in some cases (LF-FW-P16)

- 16 Reticulated services can be made available to new customers by the service provider, but the costs of associated new infrastructure or infrastructure upgrades could potentially be high. While this could be funded through rates and development contributions, in many cases, the service provider will choose to pass these costs directly on to the individual customer.

CONCLUSION

- 17 I would be happy to answer questions and provide more information on the DCC as a three waters service provider, and the challenges I expect the DCC would face as a result of the proposed freshwater provisions. Mr Taylor will speak directly to planning solutions that would address those challenges.