

# Site Compliance Report

**Site No:** REG612185  
**Site Owner:** Waikato District Council  
**Site Name:** Raglan Urban Area Stormwater  
**Date:** 18 December 2020

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## 1 INTRODUCTION

The following resource consent is held for the site:

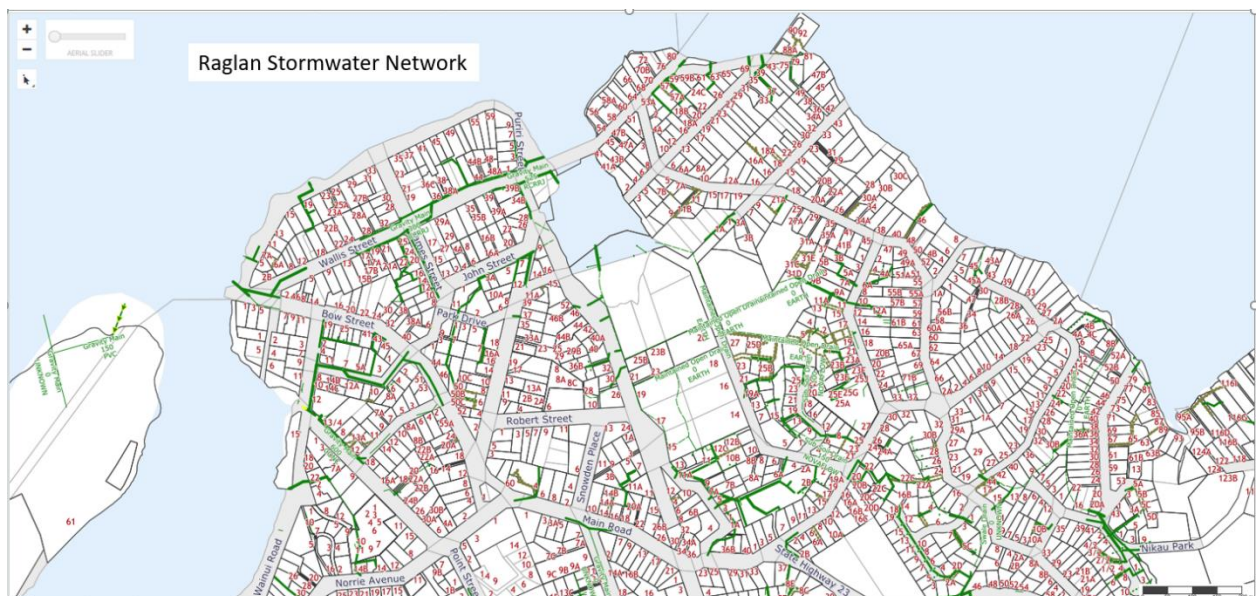
Resource Consent	Status	Description	Commenced	Expiry
AUTH105646.01.01	Current	Divert & discharge urban stormwater & associated contaminants at multiple locations to Raglan Harbour/estuary & land, & use discharge structures, within the vicinity of Raglan urban area	16/10/2008	22/09/2028

This report examines the level of compliance of Waikato District Council with the selected conditions of this resource consent.

## 2 BACKGROUND

Waikato District Council (WDC) has contracted Watercare Services Limited (WSL) to operate and maintain the 3 waters functions of the WDC on behalf of the local communities served by them.

This audit looks at the performance of the consent holder in operating the Raglan townships urban stormwater system. The stormwater is collected via catchpits and channels and is directed to the receiving water of the Raglan/Whaingaroa harbour. Some treatment is undertaken within the stormwater system in the form of Enviropods fitted into some catchpits that filter out gross debris from the stormwater flows.



This is the first year that WSL has produced the annual reports for WDC stormwater systems and consents. The newly formatted annual report (doc ref 17579759) encompasses all the towns within the district that have stormwater consents.

## 2.1 PREVIOUS COMPLIANCE HISTORY

Date Period	Compliance status
1 July 2020 to 30 June 2021	Partial compliance
1 July 2019 to 30 June 2020	Significant non-compliance
1 July 2018 to 30 June 2019	Provisional compliance
1 July 2017 to 30 June 2018	Partial compliance
1 July 2016 to 30 June 2017	Not undertaken
1 July 2015 to 30 June 2016	Full compliance
1 July 2014 to 30 June 2015	Not undertaken

As a result of the significant non-compliance recorded for the 19-20 compliance year the consent holder was issued with a formal warning and an abatement notice. The abatement notice required the WDC to take the following actions:

Waikato Regional Council gives notice that you take the following action:

- Progress remedial options to resolve the issue of flooding at 32 Cambrae Road, Raglan such as:
  1. Remove the piped section and restore it to an open channel capable of conducting the flows.
  2. Replace the pipe work with a suitably sized diameter pipe to be able to adequately handle the flows likely at this location;
- The consent holder shall ensure Hydrocarbon capture (oil separator) type devices are increased to all end of the line catchpits to prevent hydrocarbons being discharged. Further enhanced treatment options should be considered in any new structures and developments to reduce the discharge of metals to the receiving water. Metals being discharged at elevated levels may be having an adverse effect on shellfish in the harbour and this should be investigated further;
- The consent holder shall undertake audits of any high risk sites to educate operators of their responsibility to prevent the contamination of the stormwater system. The operators should be made aware of where their stormwater system discharges to, and how to safely store and handle any contaminants used on their sites;
- Identify all changes to the stormwater networks since the commencement of consent which have potentially increased the scale or intensity of the actual and/or potential adverse effects of the authorised activities on the environment. These changes must be quantified, documented and reported in the 2019/20 Annual Report;
- Undertake an investigation into the levels of metals the sampling regime and take actions to reduce the levels of Zinc, copper, Chromium, lead and nickel to within the 95% trigger values of the ANZECC guideline values;
- Provide an update as to any Stormwater Quality Improvement Programme initiatives that have been implemented or any changes and additions to your chosen management initiatives;
- Review and update the Stormwater Management plan to ensure it is relevant and reflects the current situation with regards to the Raglan Stormwater system. Submit for approval in a technical certification capacity;
- Review, update and submit the Monitoring Programme for approval in a technical certification capacity;

in accordance with the comprehensive stormwater discharge resource consent AUTH105646.01.01

The required actions have either been completed or are underway and ongoing towards a resolution.

## 3 COMPLIANCE ASSESSMENT

Unless otherwise specified in this document this assessment covers the period from **1 July 2019 to 30 June 2020**.

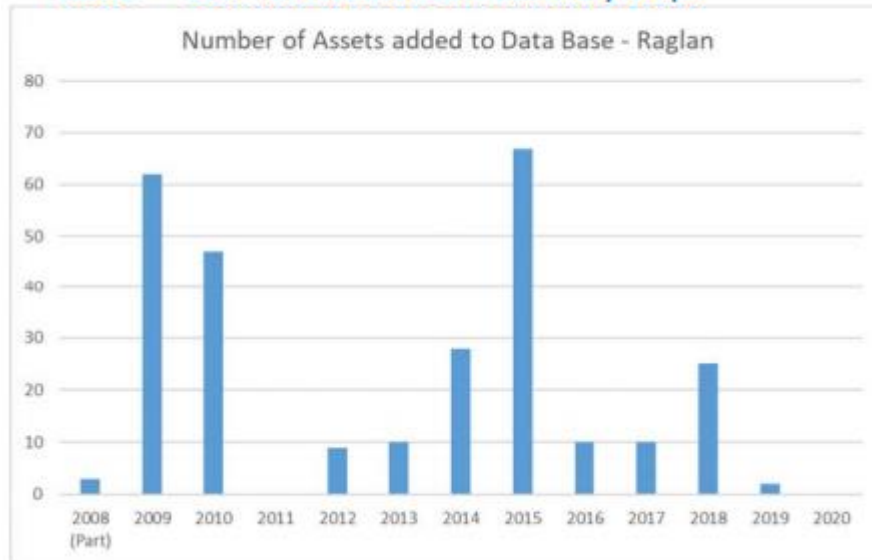
This compliance assessment has been undertaken based on the submitted annual report by the consent holder, monitoring data supplied throughout the compliance period and any site inspections undertaken. Some administration, duplicate or irrelevant conditions have been omitted for brevity.

Please note that a description of the classification system used to describe compliance status is given in Appendix 1 of this report.

#### AUTH105646.01.01 - Water - stormwater

<b>Activity Authorised: Divert &amp; discharge urban stormwater &amp; associated contaminants at multiple locations to Raglan Harbour/estuary &amp; land, &amp; use discharge structures, within the vicinity of Raglan urban area</b>	
<b>Condition No.</b>	<b>Description</b>
1)	This consent is subject to the General Conditions listed in Schedule A.
<b>Evidence</b>	see assessment in schedule A
<b>Action Required</b>	<b>Full compliance</b>
2)	All municipal stormwater diversion and discharge activities that are authorised by this consent shall be designed, operated and maintained in general accordance with the application for this consent, the General Conditions in Schedule A of this consent, and as identified in the resource consent conditions below.
<b>Evidence</b>	The consent holder states in their annual report that:  The WRC stormwater and development guidelines along with the Regional Infrastructure Technical Specification (RITS) outlines the required standards to provide an effective utility service.  Future actions from WDC include:  Design, maintain and operate a robust, sustainable and compliant stormwater system.
<b>Action Required</b>	<b>Full compliance</b>
3)	All municipal stormwater diversion and discharge activities that are authorised by this consent relate to the Waikato District Council municipal stormwater system as constructed at the commencement of this consent, and as generally shown on the Waikato District Council Stormwater / Catchment Maps dated July 2008. Any new municipal stormwater diversion and discharge activities that become authorised after the commencement of this consent shall be shown on updated versions of these maps, and these shall be provided to the Waikato Regional Council on an annual basis where the drawings have changed in the previous year, in accordance with Condition 9 of this consent.
<b>Evidence</b>	The consent holder states in their annual report that:  Updates of assets are managed through the consenting process and communication with the LDE team (WDC). Changes to assets are managed by the main WDC database and reported each year. Urban area asset maps have been updated and included in this report.
<b>Status Reasoning</b>	WDC stormwater asset maps were checked on 18 December 2020 and it was noted that they had not been updated with changes that had been made to the Wainui Road and Stewart Road areas. It was also noted that some Enviropods are not listed on the network maps. In response to this the consent holder states in their annual report:

### 15.4.1 Stormwater Asset Data Summary Graph



Raglan has had 273 assets added to the asset database since the consent was granted in September 2008 giving a total asset count of 1929. Only 2 assets were added to the database for the 2019/2020 reporting period. A detailed summary of added assets is summarised below: The database has not had significant asset data inputted since 2018. The GIS layers for stormwater show missing links to assets in multiple locations, so it appears there is missing asset data. To rectify this, WDC commenced an asset data capture program (2019) for stormwater which WSL has picked up and continuing. Raglan is a low priority for asset surveying and is planned to commence in 2024. Refer to section 22.1 of the annual report for a summary of the asset mapping initiative.

<b>Action Required</b>	<b>Please ensure all stormwater assets are recorded correctly on the GIS mapping system to reflect what is physically on the ground in Raglan</b>	<b>Minor technical non-compliance</b>
4)	Within 6 months of the commencement of this consent, the consent holder shall have completed a review of the quality of the stormwater being discharged from the Bow Street outfall and the impacts of this discharge on the quality and health of Raglan Harbour in the vicinity of the outfall. This review shall be provided to Waikato-Tainui, Te Kotuku Whenua, the Raglan Community Board and Whaingaroa Harbour Care for their comment. The review (and any comments provided by the aforementioned groups) shall be provided to the Waikato Regional Council for comment within 9 months of the commencement of this consent. If as a result of these investigations, it is concluded by both the consent holder and the Waikato Regional Council that discharges from the Bow street outfall are adversely affecting the health of the Whaingaroa (Raglan) Harbour, the applicant shall submit a report to the Waikato Regional Council for approval which: a) Describes the works needed to avoid, remedy or mitigate adverse effects; b) Proposes a timeframe for implementing these upgrade works. On approval of this report, which shall be limited to whether the report complies with the requirements of this condition and whether the timeframe proposed to implement these upgrade works is appropriate, the consent holder shall implement the upgrade works programme.	
<b>Evidence</b>	relates to an earlier period	
<b>Status Reasoning</b>		
<b>Action Required</b>		<b>Not assessed</b>
5)	Within 6 months of the commencement of this consent, the consent holder shall submit a report to the Waikato Regional Council which: a) Identifies any streams within the Raglan urban stormwater catchment in which stormwater reticulation assets are impeding the upstream and downstream passage of fish; b) Describes the works needed to restore fish passage within each of the impeded stream channels identified; and c) Proposes a timeframe for implementing these upgrade works. On approval of this report, which shall be limited to whether the report complies with the requirements of this condition and whether the timeframe proposed to implement these upgrade works is appropriate, the consent holder shall implement the approved upgrade works programme.	

<b>Evidence</b>	relates to an earlier period	
<b>Action Required</b>		<b>Not assessed</b>
6)	Within 3 months of the commencement of this consent, the consent holder shall install catch pit inserts into the stormwater catch pits shown on Figure 2 of the application titled "Proposed Catchpit Insert Locations in Raglan". These inserts shall be installed and maintained in accordance with the manufacturers specifications.	
<b>Evidence</b>	relates to an earlier period	
<b>Action Required</b>		<b>Not assessed</b>
7)	Further to the development and implementation of the Stormwater Education Programme required by Condition 27 within Schedule A – General Conditions, and within 3 months of the commencement of this consent, the consent holder shall install permanent information plaques or symbol on or beside all unmarked stormwater catch pits within the Raglan urban stormwater reticulation system which discharge directly (without treatment) into Raglan Harbour, to improve community awareness of the connection between the stormwater system and Raglan Harbour. The design and content of the plaques shall be consistent with those currently used in Raglan, but do not necessarily have to be the same.	
<b>Evidence</b>	The consent holder states in their annual report that: "fish" symbols have been affixed to all stormwater grates within the town	
<b>Status Reasoning</b>		
<b>Action Required</b>		<b>Full compliance</b>
8)	The consent holder shall retain appropriately qualified and experienced persons to prepare a monitoring programme. The objectives of the monitoring programme are to: - Investigate the actual and potential adverse effects of the municipal stormwater system's diversion and discharge activities on the receiving environments; - Determine compliance with the conditions of this consent; - Determine achievement of the outcomes and standards set out in the Stormwater Management Plan once it has been approved by the Waikato Regional Council; - Provide guidance on changes necessary to Waikato District Council's stormwater Management Plan to ensure adverse effects on the receiving environment are avoided, remedied or mitigated The monitoring programme shall be prepared in consultation with key stakeholders including Waikato-Tainui, Te Kotuku Whenua and Whaingaroa Harbour Care as a minimum, and be to a standard acceptable to the Waikato Regional Council. This report shall be forwarded to the Waikato Regional Council within 12 months of the commencement of this consent. The consent holder shall review the monitoring programme on a five yearly basis, and shall forward any suggested alterations to the Waikato Regional Council for approval. Note: The monitoring programme may include the following: a) Monitoring of scour and erosion effects due to stormwater diversions and discharges. b) Monitoring for visual signs of contaminants in stormwater (conspicuous oil or grease films, scums or foams, floatable suspended materials, conspicuous change in colour or visual clarity). c) Monitoring to identify municipal stormwater diversion and discharge structures that are impeding the upstream and downstream movement of fish. d) Monitoring to ensure that all municipal stormwater system management devices are maintained in good working order, and stormwater quality treatment devices achieving optimal contaminant removal efficiency at all times. e) Monitoring to determine efficient street and catchpit cleaning operations and frequencies. f) Monitoring to identify informal wastewater system connections to the municipal stormwater system, and to gauge wastewater pump station overflow frequencies. g) Monitoring to determine municipal stormwater system collection points that are at risk from non-routine contaminant discharges.	
<b>Evidence</b>	The consent holder (WDC) has in conjunction with the operator (WSL) taken on a stormwater engineer Andrew Baldero to prepare a revised monitoring program that will more accurately reflect the quality of the stormwater that is entering Raglan Harbour. The revised monitoring plan is expected to be submitted to WRC in early 2021. the revised plan should consider and include the following points.  a) Monitoring of scour and erosion effects due to stormwater diversions and discharges.  b) Monitoring for visual signs of contaminants in stormwater (conspicuous oil or grease films, scums or foams, floatable suspended materials, conspicuous change in colour or visual clarity).	

	<p>c) Monitoring to identify municipal stormwater diversion and discharge structures that are impeding the upstream and downstream movement of fish.</p> <p>d) Monitoring to ensure that all municipal stormwater system management devices are maintained in good working order, and stormwater quality treatment devices achieving optimal contaminant removal efficiency at all times.</p> <p>e) Monitoring to determine efficient street and catchpit cleaning operations and frequencies.</p> <p>f) Monitoring to identify informal wastewater system connections to the municipal stormwater system, and to gauge wastewater pump station overflow frequencies.</p> <p>g) Monitoring to determine municipal stormwater system collection points that are at risk from non-routine contaminant discharges.</p>
<b>Status Reasoning</b>	Current monitoring plan is ineffective and not representative of the accurate picture of any contamination reaching the harbour from the stormwater system.
<b>Action Required</b>	<p>Please submit an updated and revised monitoring plan for Raglan stormwater that encompasses items a) to g) in the condition above.</p> <p style="text-align: right;"><b>Minor technical non-compliance</b></p>
9)	<p>The consent holder shall provide to the Waikato Regional Council a written management report by 30 September 2009, and annually thereafter for each year that this consent is current, unless otherwise approved in writing by the Waikato Regional Council As a minimum this report shall include the following: a) A summary of the Stormwater Management Plan initiatives undertaken during the year, along with the results of these initiatives. Also a summary of the Stormwater Management Plan initiatives that are proposed for the coming year, along with any proposed amendments to the plan if/where considered appropriate by the consent holder. b) A summary of the monitoring results undertaken in accordance with the monitoring programme required under Condition 8 of this consent, and a critical analysis of the information in terms of compliance and environmental effects. Suggested modifications to the monitoring requirements of Condition 8 shall also be provided if/where considered appropriate by the consent holder. c) A summary of the level of compliance achieved with all conditions of this consent, including any reasons for non-compliance or difficulties in achieving compliance. d) Details of all non-routine contaminant discharge incidents that have been responded to, and a summary of the outcomes of these incidents. Also identification of any changes in incident response protocols, or any management decisions that have been implemented to reduce the occurrence and/or potential effects of these types of incidents. e) A summary of complaints received in regard to the activities authorised by this consent. A summary of how these complaints have been responded to should also be provided. f) Suggested actions to remediate any non-compliance with the conditions of this consent. Details of any other matters relevant to this consent that the consent holder wishes to report.</p>
<b>Evidence</b>	<p>The consent holder has submitted a new format stormwater annual report for all WDC sites (doc ref 17579759). The report was submitted slightly later than 30 September due to the extensive reformatting and the consent holder had requested a slight delay in submission date to allow for this.</p> <p>a) A summary of the Stormwater Management Plan initiatives undertaken during the year, along with the results of these initiatives. Also a summary of the Stormwater Management Plan initiatives that are proposed for the coming year, along with any proposed amendments to the plan if/where considered appropriate by the consent holder.</p> <p>b) A summary of the monitoring results undertaken in accordance with the monitoring programme required under Condition 8 of this consent, and a critical analysis of the information in terms of compliance and environmental effects. Suggested modifications to the monitoring requirements of Condition 8 shall also be provided if/where considered appropriate by the consent holder. c) A summary of the level of compliance achieved with all conditions of this consent, including any reasons for non-compliance or difficulties in achieving compliance. d) Details of all non-routine contaminant discharge incidents that have been responded to, and a summary of the outcomes of these incidents. Also identification of any changes in incident response protocols, or any management decisions that have been implemented to reduce the occurrence and/or potential effects of these types of incidents. e) A summary of complaints received in regard to the activities authorised by this consent. A summary of how these complaints have been responded to should also be provided. f) Suggested actions to remediate any non-compliance with the conditions of this consent. Details of any other matters relevant to this consent that the consent holder wishes to report.</p>
<b>Status Reasoning</b>	

<b>Action Required</b>		<b>Full compliance</b>
Schedule A 1)	The consent holder shall be responsible for the design, maintenance and physical integrity of the municipal stormwater system, and shall operate and maintain the municipal stormwater system to avoid, remedy or mitigate adverse effects on the environment.	
<b>Evidence</b>	<p>The consent holder bases its stormwater design on the principles set out in the Regional Infrastructure Technical Specification (RITS) which is a document that sets out how to design and construct transportation, water supply, wastewater, stormwater and landscaping infrastructure in the participating councils' areas.</p> <p>Maintenance has had some issues in Raglan due to the remoteness of the location and the inability of local contractors to raise full Enviropods due to their weight. The maintenance schedules need to be improved to prevent any flooding issues due to blocked stormwater assets.</p> <p>The consent holder does repair and maintain the physical integrity of their stormwater assets as required.</p> <p>The adverse effects on the environment, if any, are not well understood due to the inadequacies of the current monitoring program. The consent holder is currently compiling a new monitoring program which should more accurately reflect the situation with regards to any adverse effects on the receiving environment.</p>	
<b>Status Reasoning</b>	There have been issues with localised flooding from some assets that have become blocked with debris. The consent holder is taking steps to improve the maintenance processes and schedules to improve the situation.	
<b>Action Required</b>	<b>The consent holder is aware of the shortcomings with respect to maintaining stormwater assets and is taking steps to improve the situation. The consent holder is also currently undertaking a review of the monitoring program for the area.</b>	<b>Low priority non-compliance</b>
Schedule A 2)	The consent holder shall not undertake any changes to the municipal stormwater system which would increase the scale and/or intensity of actual or potential adverse effects of municipal stormwater diversion and discharge activities on the receiving environment.	
<b>Evidence</b>	It is not fully understood by WRC whether any changes to the stormwater system have occurred as WDC has not always fully informed WRC of any changes.	
<b>Status Reasoning</b>	There is some concern by local councillors and members of the public concerning the new housing development on the corner of Wainui and Stewart Roads along with upgraded stormwater assets associated with this development.	
<b>Action Required</b>	<b>Further sampling will be required under the new monitoring plan to better understand any potential or actual adverse effects on the receiving environment.</b>	<b>Minor technical non-compliance</b>
Schedule A 3)	The consent holder shall seek to implement Best Practicable Options to minimise actual and potential adverse effects of municipal stormwater diversion and discharge activities on the environment.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>During the consenting process (operational reviews and preapplication meetings) WDC undertakes technical reviews to ensure best practical options are provided for new developments. Assets projects follow best management process including safety in design to ensure best practical outcomes.</p>	
<b>Status Reasoning</b>	unable to assess compliance based on lack of information	
<b>Action Required</b>	<b>Please provide documented evidence of any assessment of best practicable options when deciding on which stormwater assets to construct or install in the annual report.</b>	<b>Full compliance</b>
Schedule A 4)	The consent holder shall remedy adverse scour and erosion effects to land and the beds of receiving water bodies, where such effects are clearly attributable to the municipal stormwater diversion and discharge activities authorised by this consent.	

<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>WDC identify adverse flood effects through use of its Customer Request Management System and through observation and inspection during flood events.</p> <p>No CRM items identified adverse effects from private drainage. More formalised reporting required for 2020/2021 annual report.</p>	
<b>Status Reasoning</b>	<p>WRC is unaware of any complaints or reports of adverse scour and erosion effects to land and the beds of receiving water bodies as a result of this consented activity.</p>	
<b>Action Required</b>	<p><b>Please ensure more formalised reporting is included for 2020/2021 annual report.</b></p>	<p><b>Full compliance</b></p>
Schedule A 5)	<p>The consent holder shall ensure that the municipal stormwater system is operated and maintained in such a way as to reasonably minimise the potential for adverse flooding effects to land and property that may otherwise result from municipal stormwater diversion and discharge activities. Note: Municipal stormwater diversion and discharge activities in conjunction with urban land-use can adversely affect flood potential by either limiting the rate at which stormwater drains from a catchment, or by increasing the rate and volume of discharge to downstream catchments. Whilst such effects are the subject of this consent, it is also recognised that 'levels of service' for catchment flooding are established by the consent holder through separate statutory procedures and consultation with its community. These 'levels of service' are not the subject of this consent.</p>	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>WDC identify adverse flood effects through use of its Customer Request Management System and through observation and inspection during flood events.</p> <p>One issue was reported for this reporting period.</p> <p>Catchment management plans and flood modelling is also undertaken for active flood management and identifying flood risk areas.</p> <p>Complete/update catchment management plan/flood risk modelling (long term) All CRM issues have been managed by the operations team except for the one flooding issue which is currently in the design stage and due to be constructed during the next construction season.</p>	
<b>Status Reasoning</b>	<p>One flood related issue remains as yet unresolved at Cambrae Road. WDC has formulated a plan to rectify the solution by replacing a culvert with a larger diameter one to alleviate flooding during high rainfall events. Full compliance can be achieved when this issue has been resolved fully.</p>	
<b>Action Required</b>	<p><b>Please keep WRC advised of the works to resolve the flooding issue in Cambrae Road Raglan.</b></p>	<p><b>Low priority non-compliance</b></p>
Schedule A 6)	<p>The consent holder shall be responsible for avoiding, remedying and mitigating any adverse flooding, scour, erosion or sedimentation effects on private land and drainage systems where these effects are clearly attributable to municipal stormwater diversion and discharge activities authorised by this consent. To this end the consent holder shall keep a record of complaints associated with municipal stormwater diversion and discharges to private land and drainage systems, and the actions taken by the consent holder in response to these complaints.</p>	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>WDC identify adverse flood effects through use of its Customer Request Management System and through observation and inspection during flood events. No private issues were reported that required follow up for this reporting period (excluding items already covered in item 5).</p> <p>This action is also linked to the identification and monitoring of high- risk sites. Refer to Section 15.7 of the annual report</p>	



<b>Status Reasoning</b>	The only known flooding issue on private land is the one mentioned in condition A5 above in Cambrae Road. this has been identified and reported to WDC and the council is taking steps to remedy this issue in early 2021	
<b>Action Required</b>		<b>Full compliance</b>
Schedule A 7)	As far as practicable, the consent holder shall manage the municipal stormwater system such that stormwater diversion and discharge activities do not result in more than minor adverse effects on aquatic ecosystems.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>Adverse effects on aquatic ecosystems (receiving environments) are minimised and avoided through the establishment and implementation of appropriate management initiatives as detailed in this report and the SMP.</p> <p>Due to the current testing criteria, a revised monitoring program is required prior to enable this to be assessed. A revision of the sampling program is currently underway.</p>	
<b>Status Reasoning</b>	Current monitoring is of insufficient standard to adequately demonstrate any adverse effects on the environment. The new revised sampling regime will hopefully demonstrate more clearly if there is any more than minor adverse effects on the environment as a result of stormwater discharges.	
<b>Action Required</b>		<b>Not assessed</b>
Schedule A 8)	With the exception of ephemeral watercourses, all structures that have been placed in natural and modified watercourses to enable municipal stormwater diversion and discharge activities shall allow, or be modified where possible to allow, for the safe upstream and downstream movement of fish. When acting on this condition, all stormwater system modifications and fish passage devices shall be designed and constructed to the satisfaction of the Waikato Regional Council. Note: When acting on this condition the consent holder shall also consult with the Department of Conservation, in accordance with Part VI of the Freshwater Fisheries Regulations 1983.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>As part of its ongoing asset upgrade and improvement, WDC includes provision of fish passage through culverts where problems are identified, and remediation is practicable. Fish passage assessment and mitigation in Raglan have been complete. The only culvert of concern for fish passage (T+T Report) has had a climbing rope installed and is inspected yearly. The last inspection was undertaken 24 June 2020</p>	
<b>Status Reasoning</b>		
<b>Action Required</b>		<b>Full compliance</b>
Schedule A 9)	Structures that enable municipal stormwater diversion and discharge activities shall be maintained by the consent holder in a visually unobtrusive manner. Note: For the purposes of this condition, the extent of maintenance works undertaken by the consent holder may be limited to the use of plantings or minor landscaping but may also link with other consent holder educational and management initiatives.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>There are no service request relating to aesthetics or visual improvements undertaken for the 2019/2020 reporting period. WDC involvement with consent processing and regular inspections during maintenance works assists in assuring aesthetics are maintained.</p> <p>Monitor and check aesthetics during routine inspections and call outs. Scoring based on no reports of aesthetics issues from the public or during inspections for the reporting period.</p>	

<b>Status Reasoning</b>	WRC has received no complaints or reports of any municipal stormwater diversion and discharge activities that are maintained by the consent holder being in a visually obtrusive standard.	
<b>Action Required</b>		<b>Full compliance</b>
Schedule 10)	A The consent holder shall as soon as reasonably practicable notify Waikato District Council, Watercare Services Ltd and the Waikato Regional Council of an event that may in itself, or as a consequence of an event, have a significant adverse effect on the quality of the water at any of the abstraction points of the aforementioned drinking water supplies. The consent holder shall record the reasons why the situation occurred, the actions taken by the consent holder and an assessment of what measures can be adopted in the future to minimise such occurrences and upon written request from the Waikato Regional Council provide a report to the Waikato Regional Council and the Medical Officer of Health.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>Notification of WRC in the event of a stormwater discharge that may affect the quality of water intake to any potable water supply.</p> <p>No CRM reports relating to a water supply were logged during the 2019/2020 reporting period.</p>	
<b>Status Reasoning</b>		
<b>Action Required</b>		<b>Full compliance</b>
Schedule 11)	A All Waikato District Council asset management activities, including those relating to: a) municipal stormwater system activities; b) municipal water and wastewater systems activities; c) municipal roading and footpath activities; d) municipal parks and gardens activities; e) municipal refuse collection activities; and f) municipal building maintenance activities shall be undertaken and managed to minimise contaminants discharging to/from the municipal stormwater system to the receiving environment.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>All WDC asset management activities are undertaken in a manner that minimises potential for contaminant discharges to the stormwater system or receiving environments. Wastewater and water supply systems are undertaken by WSL on behalf of WDC and are reported separately. The WDC roading alliance undertakes road maintenance (street sweeping and catchpit clearing).</p> <p>Additional information on other services to be provided in the 2020/2021 reporting period. Rating given as minor as specific conditions relating to performance of these activities are covered in other conditions.</p>	
<b>Status Reasoning</b>	It has not been reported or noted that any contaminants to the stormwater system have derived from any WDC activities as listed.	
<b>Action Required</b>		<b>Full compliance</b>
Schedule 12)	A The consent holder shall carry out regular street and catchpit cleaning operations to minimise the volume of stormwater contaminants entering the municipal stormwater system and discharging to the receiving environment. When determining appropriate street sweeping frequencies, the consent holder shall take account of the land use characteristics within respective stormwater sub-catchments, the intensity of the various land use activities taking place, and any means other than street sweeping operations that are currently being used to control and/or treat contaminated stormwater.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>Street sweeping and catchpit cleaning undertaken by the WDC Roading Alliance at 6 monthly intervals. Catchpit insert are maintained monthly by Extreme Zero Waste.</p> <p>Monitoring of the level of material in catchpits to determine appropriate cleaning frequencies forms part of the monitoring programme.</p>	

		Review of maintenance performance and frequency is currently underway.	
<b>Status Reasoning</b>		<p>WRC has been made aware of occurrences where catchpits have not been emptied at a suitable frequency and catchpits have filled and overflowed and caused issues at some locations. WDC has advised WRC that their contractors who are tasked to empty the catchpits do not have suitable equipment to enable them to empty full Enviropods.</p> <p>The equipment available for this purpose needs improving so that Enviropods and other catchpits can be emptied at a suitable frequency to reduce the risk of blockages, overflows and risk of flooding.</p>	
<b>Action Required</b>		<b>Investigate and make improvements to available equipment and staff in order to undertake adequate frequency of catchpit emptying to avoid blockages and overflows.</b>	<b>Low priority non-compliance</b>
Schedule 13)	A	All stormwater catchpit devices that are associated with the municipal stormwater system shall be capable of capturing and retaining the majority of gross pollutants. New and/or replacement stormwater catchpits shall be further capable of capturing the majority of floatable contaminants, such as oil and grease, when constructed.	
<b>Evidence</b>		<p>The consent holder states in their annual report that:</p> <p>All catchpits installed by WDC in accordance with its consent for Raglan are capable of capturing and retaining the majority of gross pollutants. Catchpit inserts are required for further sediment and gross pollutant capture. Refer to the stormwater initiatives section for further details.</p> <p>Review of performance and roll out as per stormwater initiatives required. Additional maintenance required for catchpit inserts. Performance/effects already scored in item 13.</p>	
<b>Status Reasoning</b>		<p>Frequency of emptying and suitable equipment for lifting and cleaning catchpits need improvement. The consent holder is aware of this and taking steps to improve the situation.</p> <p>No new stormwater infrastructure has been installed during this compliance period</p>	
<b>Action Required</b>		<b>Implement improved equipment and frequency of catchpit emptying to prevent blockages and flooding/overflows. Any new and/or replacement stormwater catchpits shall be further capable of capturing the majority of floatable contaminants, such as oil and grease, when constructed.</b>	<b>Low priority non-compliance</b>
Schedule 14)	A	All stormwater quality treatment devices that form part of the municipal stormwater system shall be operated and maintained to provide the best practicable option for stormwater contaminant removal efficiency at all times.	
<b>Evidence</b>		<p>The consent holder states in their annual report that:</p> <p>WDC undertakes regular maintenance of stormwater treatment devices to ensure effective operation. Treatment device locations and their specific maintenance frequencies are detailed in the SMP.</p> <p>Regular maintenance is currently being reviewed and will be rolled out. Further work required to be confident that treatment devices are effectively operating.</p>	
<b>Status Reasoning</b>		<p>More work is required to be done to ensure all stormwater quality treatment devices that form part of the municipal stormwater system are operated and maintained to provide the best practicable option for stormwater contaminant removal efficiency at all times.</p> <p>The consent holder is aware of the issues involved and is taking action to rectify the shortfall as part of the SMP review.</p>	
<b>Action Required</b>		<b>More work is required to be done to ensure all stormwater quality treatment devices that form part of the municipal stormwater system are operated and maintained to provide the best practicable option for stormwater contaminant removal efficiency at all times.</b>	<b>Low priority non-compliance</b>

Schedule 15)	A	The consent holder shall undertake monitoring programmes that identify and discontinue informal wastewater system connections to the municipal stormwater system and instigate remediation programmes aimed at discontinuing such connections.																																		
<b>Evidence</b>		<p>The consent holder states in their annual report that:</p> <p>No wastewater connections or discharges were identified or reported as part of the monitoring undertaken at Raglan. Additional SW quality monitoring will assist to identify informal connections and effects.</p> <p>WRC is not aware of any misconnections to the stormwater system.</p>																																		
<b>Status Reasoning</b>																																				
<b>Action Required</b>		<b>Full compliance</b>																																		
Schedule 16)	A	Where formal wastewater system connections to the municipal stormwater system make up part of the municipal wastewater system design and operation, the consent holder shall undertake to minimise as far as practicable, the discharge of wastewater system contaminants to the municipal stormwater system.																																		
<b>Evidence</b>		<p>The consent holder states in their annual report that:</p> <p>Formal wastewater connections are tracked through the consenting process and reported on in the annual wastewater report. No formal wastewater connections were approved or installed during the reporting period.</p>																																		
<b>Status Reasoning</b>																																				
<b>Action Required</b>		<b>Full compliance</b>																																		
Schedule 17)	A	Events resulting in significant discharges of wastewater to the municipal stormwater system shall be reported to the Waikato Regional Council as soon as practicable after the consent holder becomes aware of such a discharge.																																		
<b>Evidence</b>		<p>The consent holder states in their annual report that:</p> <p>Refer to section 15.6.4 (below) for the wastewater discharge summary which outlines any discharges to waterways. No outstanding incidents. Reported spills were controlled and closed out</p> <p style="text-align: center;"><b>15.6.4 Wastewater summary table</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #4F81BD; color: white;"> <th colspan="2">Wastewater incidents Summary Table - Raglan</th> </tr> <tr style="background-color: #4F81BD; color: white;"> <th>Item and Description</th> <th>Number</th> </tr> </thead> <tbody> <tr style="background-color: #D9E1F2;"> <td colspan="2"><b>General</b></td> </tr> <tr> <td>Total wastewater requests for town/village</td> <td style="text-align: center;">17</td> </tr> <tr> <td>Total wastewater requests for town/village relating to stormwater</td> <td style="text-align: center;">6</td> </tr> <tr style="background-color: #D9E1F2;"> <td colspan="2"><b>Stormwater Affected CRMs</b></td> </tr> <tr> <td>Total Dry weather overflows</td> <td style="text-align: center;">6</td> </tr> <tr> <td>Total Wet weather overflows</td> <td style="text-align: center;">0</td> </tr> <tr> <td>Overflows assessed as potentially entering a waterway</td> <td style="text-align: center;">2</td> </tr> <tr style="background-color: #D9E1F2;"> <td colspan="2"><b>Overflow volume summary</b></td> </tr> <tr> <td>Overflows less than 1m<sup>3</sup></td> <td style="text-align: center;">5</td> </tr> <tr> <td>Overflows less than 10m<sup>3</sup></td> <td style="text-align: center;">1</td> </tr> <tr> <td>Overflows less than 100m<sup>3</sup></td> <td style="text-align: center;">0</td> </tr> <tr> <td>Overflows greater than 100m<sup>3</sup></td> <td style="text-align: center;">0</td> </tr> <tr style="background-color: #4F81BD; color: white;"> <td colspan="2"><b>Summary</b></td> </tr> <tr> <td>Total stormwater related wastewater incidents closed out</td> <td style="text-align: center;">6</td> </tr> <tr> <td>Total stormwater related wastewater incidents requiring follow/future works</td> <td style="text-align: center;">0</td> </tr> </tbody> </table> <p>There are no outstanding issues relating to stormwater. Please refer to the wastewater annual report for further information regarding wastewater incidents.</p>	Wastewater incidents Summary Table - Raglan		Item and Description	Number	<b>General</b>		Total wastewater requests for town/village	17	Total wastewater requests for town/village relating to stormwater	6	<b>Stormwater Affected CRMs</b>		Total Dry weather overflows	6	Total Wet weather overflows	0	Overflows assessed as potentially entering a waterway	2	<b>Overflow volume summary</b>		Overflows less than 1m <sup>3</sup>	5	Overflows less than 10m <sup>3</sup>	1	Overflows less than 100m <sup>3</sup>	0	Overflows greater than 100m <sup>3</sup>	0	<b>Summary</b>		Total stormwater related wastewater incidents closed out	6	Total stormwater related wastewater incidents requiring follow/future works	0
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<b>Status Reasoning</b>	WDC reports significant discharges of wastewater to WRC as required.	
<b>Action Required</b>	<b>Ensure that WDC/WSL reports all significant spills from the wastewater system as they are notified of them.</b>	<b>Full compliance</b>
Schedule 18)	A The consent holder shall undertake investigations to identify and address routine contaminant discharges to the municipal stormwater system from known contaminated land, and commercial and industrial sites. In circumstances where site owners/operators are routinely discharging contaminants to the municipal stormwater system, or contaminants to land that could routinely discharge to the municipal stormwater system during rain events, the consent holder shall liaise with site owners/operators to determine appropriate stormwater management measures that will be implemented to avoid, or if avoidance is impractical, to remedy or mitigate these contaminant discharges.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>Investigation and mitigate known routine contaminant discharges to the stormwater system. Current consenting and trade waste permit process in place controls the potential routine contamination discharges. There are no known trade waste connections to the stormwater system in this area.</p> <p>No routine contaminant discharges to the stormwater system were reported during this reporting period from contaminated land, industrial or commercial properties.</p>	
<b>Status Reasoning</b>	See section 15.7 of the annual report	

## 15.7 High Risk Sites

### 15.7.1 Identification and Consultation Summary Table

High Risk Site Summary Table				
Trade waste Summary				
Type	SW Pre-Treatment	Consent Date	Consent Expiry	Connection
Bar and restaurant	Grease Trap	3/12/19	-	Sewer
Café	-	26/11/19	-	Sewer
Brewery	-	04/02/20	04/02/2021	Sewer
Fast food	-	02/12/19	-	Sewer
Restaurant	-	03/12/19	-	Sewer
Hairdresser	-	26/11/19	-	Sewer
Identified Sites – Stormwater				
Site Description	Risk Area	Contact (2019/2020)	Audit/ Review /Discussions	Outcome/follow up
Automotive Workshop	Hydrocarbon entering stormwater system and Harbour	Yes	Yes	Processes and spill kit in place. Flooding issue mitigated.
Automotive Workshop	Hydrocarbon entering stormwater system and Harbour	Yes	Yes	Processes and spill kit in place. Flooding issue mitigated.
Service Station	Hydrocarbon entering stormwater system and Harbour	Yes	Yes	Yearly maintenance required on the forecourt oil and water separator. Current owners (12 months) are unsure of last service and are finding out servicing details. If required, or if no records available, a service will be undertaken as soon as possible. Follow up required.
Recycling Centre	Runoff and oil storage	Yes	Yes	Recycling centre asked for additional information for compliance and runoff treatment options. Follow up required.
Raglan Wharf	Re-fuelling	No	No	Discussions around wharf operations and risk assessment required. Refuelling is completed by mobile plant. Follow up required.

This table shows the results of the initial high-risk site identification process undertaken during the 2019/2020 reporting period. This table is not an exhaustive list of all high-risk sites for the consented urban area and will be further revised and updated during the next reporting period.

#### Action Required

Full compliance

Schedule 19) A On becoming aware of a non-routine contaminant discharge to/from the municipal stormwater system, the consent holder shall make all reasonable attempts to stop the discharge and prevent further contaminant discharges from occurring. The consent holder shall seek to identify the source of the discharge and inform the Waikato Regional Council of the discharge incident as soon as practicable. At the written request of the Waikato Regional Council, the consent holder shall provide the Waikato Regional Council with information that it holds on its response to the discharge incident, and any other relevant information that may support subsequent enforcement action taken by the Waikato Regional Council against the discharger. Note: Requirements of the Fire Service Act and other legislative requirements may override the requirements of this condition.

#### Evidence

The consent holder states in their annual report that:

No non routine contaminant discharges to the stormwater system were reported during

		this reporting period	
<b>Status Reasoning</b>		WRC is unaware of any contaminant discharges that would trigger this condition during this compliance period.	
<b>Action Required</b>			<b>Full compliance</b>
Schedule 20)	A	In circumstances where non-routine contaminants are discharged from the municipal stormwater system and result in actual adverse effects in the receiving environment, the consent holder shall provide practical assistance to the Waikato Regional Council, and any other emergency response agency that becomes involved, to remedy or mitigate against further actual or potential adverse effects on the receiving environment.	
<b>Evidence</b>		The consent holder states in their annual report that:  No adverse effects were reported from non-routine contaminants from the stormwater system. Hydrocarbon testing to be brought forward to 2021.	
<b>Status Reasoning</b>		No spills of this nature have been reported.	
<b>Action Required</b>			<b>Not assessed</b>
Schedule 21)	A	When permitting new or replacement connections to the municipal stormwater system from land uses where there is a risk of contaminant substances being discharged, the consent holder shall ensure that all such connections incorporate appropriate stormwater quality treatment devices that are capable of: a) minimising all contaminants such that the conditions of this consent are complied with; and b) preventing accidental releases of hazardous substances to the stormwater system; or c) reducing all such hazardous substances prior to discharge to receiving waters to concentrations that will not result in contamination of either water or sediments to such a degree that is likely to result in adverse effects on aquatic life, or on the suitability of water for human consumption after treatment.	
<b>Evidence</b>		The consent holder states in their annual report that:  The Regional Infrastructure Technical Specification (RITS) sets out the assessment processes, design guidelines and technical specifications for the design and construction of new stormwater infrastructure within Waikato District. This includes stormwater attenuation and treatment. No connections were recorded for the reporting period, however an asset survey is required to update the database.  No assets being added to the database for 2020 suggests that assets have not undergone the vesting process or have been missed being uploaded.  Asset survey required to confirm connections – refer to asset maps	
<b>Status Reasoning</b>			
<b>Action Required</b>			<b>Not assessed</b>
Schedule 22)	A	As far as practicable, the consent holder shall manage the municipal stormwater system to minimise the discharge of any substance that is likely to cause the production of conspicuous oil, or grease films, scums or foams, or floatable suspended materials after reasonable mixing.	
<b>Evidence</b>		The consent holder states in their annual report that:  Discharges of floatable contaminants to receiving environments are minimised and avoided through the establishment and implementation of appropriate management initiatives as detailed in this report and the SMP.  The catchpit grates and inserts initiative, limits floatable contamination reaching the stormwater outlets.	
<b>Status Reasoning</b>		The consent holder is required to operate the municipal stormwater system to minimise the discharge of any substance that is likely to cause the production of conspicuous oil, or grease films, scums or foams, or floatable	

	suspended materials after reasonable mixing. By not emptying the catchpits frequently enough or failing to install oil and grease traps, the risk of these types of discharges occurring increases.													
<b>Action Required</b>	<b>The consent holder must manage the municipal stormwater system to minimise the discharge of any substance that is likely to cause the production of conspicuous oil, or grease films, scums or foams, or floatable suspended materials after reasonable mixing.</b>	<b>Low priority non-compliance</b>												
Schedule 23)	A As far as practicable, the consent holder shall manage the municipal stormwater system to minimise the discharge of concentrations of hazardous substances that are likely to adversely affect aquatic life, or the suitability of water for human consumption after treatment. Where a question arises as to whether the concentration of any particular hazardous substance is causing these effects, it shall be determined through the application of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC, 2000), or any other technical publication approved in advance by the Waikato Regional Council. Note: When applying the Australian and New Zealand Guidelines for Fresh and Marine Water Quality, the 'trigger values' within the 95% level of protection range of these guidelines shall apply.													
<b>Evidence</b>	The consent holder states in their annual report that:  Discharges of hazardous substances to receiving environments are minimised and avoided through the establishment and implementation of appropriate management initiatives as detailed in this report and the SMP. No known discharges of hazardous substances occurred during the 2019/2020 reporting period.													
<b>Status Reasoning</b>														
<b>Action Required</b>		<b>Full compliance</b>												
Schedule 24)	A As far as practicable, the consent holder shall manage the municipal stormwater system to minimise the discharge of concentrations of micro-organisms to receiving waters that are likely to adversely affect human health. Where a question arises as to whether the concentration of micro-organisms is adversely affecting human health, it shall be determined through the application of the Microbiological Water Quality Guidelines for Marine and Freshwater Recreational Areas (MfE, 2003), or any other technical publication approved in advance by the Waikato Regional Council.													
<b>Evidence</b>	The consent holder states in their annual report that:  Discharges of microorganism contaminants to receiving environments are minimised and avoided through the establishment and implementation of appropriate management initiatives as detailed in this report and the SMP.  Review of Monitoring programme required													
<b>Status Reasoning</b>	see annual report section 15.5.1 p192  <div style="text-align: center;"> <h3>15.5.1 Water Quality compliance Graphs</h3> <p><b>Water Quality Testing Summary</b></p> <table border="1"> <tr><td>TESTS OUTSIDE ANZECC TRIGGER VALUES</td><td>68</td></tr> <tr><td>TESTS WITHIN ANZECC TRIGGER VALUES</td><td>590</td></tr> <tr><td>PARAMETERS TESTED PER SAMPLE</td><td>26</td></tr> <tr><td>SAMPLE LOCATIONS</td><td>8</td></tr> </table> <p><b>Water Quality Compliance Summary</b></p> <table border="1"> <tr><td>TESTS WITHIN ANZECC TRIGGER VALUES</td><td>590</td></tr> <tr><td>TESTS OUTSIDE ANZECC TRIGGER VALUES</td><td>68</td></tr> </table> </div> No individual sample results have been supplied in the annual report. a summary of sample results has been provided and work is ongoing to produce a new sampling programme		TESTS OUTSIDE ANZECC TRIGGER VALUES	68	TESTS WITHIN ANZECC TRIGGER VALUES	590	PARAMETERS TESTED PER SAMPLE	26	SAMPLE LOCATIONS	8	TESTS WITHIN ANZECC TRIGGER VALUES	590	TESTS OUTSIDE ANZECC TRIGGER VALUES	68
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<b>Action Required</b>	<b>Undertake microbial sampling in line with the revised sampling programme due in early 2021 and submit results to WRC for assessment.</b>	<b>Not assessed</b>
Schedule 25)	A As far as practicable, the consent holder shall manage the municipal stormwater system to minimise discharges that are likely to adversely affect aquatic ecosystems and cause the following effects in receiving waters after reasonable mixing: Note: Conditions 22 - 25 describe receiving water effects that this consent is attempting to avoid, remedy or mitigate through improvements in the management and operation of municipal stormwater systems. Compliance with these conditions will therefore be determined through the establishment and implementation of appropriate stormwater management initiatives. These initiatives will aim to minimise (as far as practicable) municipal stormwater diversion and discharge activities that would otherwise cause these effects in receiving waters.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>Adverse effects on aquatic ecosystems (receiving environments) are minimised and avoided through the establishment and implementation of appropriate management initiatives as detailed in this report and the SMP. Same condition as 8 (both are scored the out of 10 giving this condition a weighting of 20)</p> <p>Additional monitoring/sampling required to quantify effects. More data required for comprehensive assessment and reporting. First flush monitoring does not enable comparison of receiving environment effects so has been scored as not assessed for this reporting period.</p>	
<b>Status Reasoning</b>	Significant work is underway to improve the sampling, monitoring and assessment of the impacts of stormwater runoff from Raglan to the Harbour. it is not possible to fully assess adverse effects on the aquatic environment until we get a new monitoring program and sample results to demonstrate any such effects.	
<b>Action Required</b>	<b>Provide a new revised sampling plan and undertake sampling as required to demonstrate any adverse effects, or lack of, on the aquatic ecosystem.</b>	<b>Not assessed</b>
Schedule 26)	A The consent holder shall prepare and implement a Stormwater Quality Improvement Programme, designed to improve the quality of municipal stormwater discharges and to generally assist the consent holder in meeting the requirements of the stormwater quality conditions of this consent. Where a Stormwater Management Plan is required the Stormwater Quality Improvement Programme may form part of this plan and be implemented through this plan.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>Stormwater quality improvements are achieved through the implementation of appropriate management initiatives as detailed in section 22.</p> <p>No new stormwater quality initiatives commenced during in the 2019/2020 reporting period. The catchpit inserts and catchpit labelling initiatives are currently active.</p>	
<b>Status Reasoning</b>	No new stormwater quality initiatives commenced during in the 2019/2020 reporting period.	
<b>Action Required</b>	<b>Ensure stormwater quality initiatives are included as part of the revised SMP</b>	<b>Not assessed</b>
Schedule 27)	A The consent holder shall prepare and implement a Stormwater Education Programme, designed to increase the general public's understanding of stormwater management and the ways in which they can minimise the contamination of stormwater and the impedance of stormwater flows. Where a Stormwater Management Plan is required the Stormwater Education Programme shall may form part of this plan and be implemented as part of this plan.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>WDC's stormwater education programme is described in the SWP and the stormwater initiatives section 22 of the annual report. No new education program initiatives were undertaken in the 2019/2020 reporting period other than the catchpit labelling.</p>	
<b>Status Reasoning</b>	No changes or improvements to the education policy have occurred during this compliance period	

<b>Action Required</b>	<b>Please ensure details of the councils stormwater education program are included in the stormwater management plan.</b>	<b>Not assessed</b>
Schedule 28)	A For all new stormwater diversion and discharge activities in urban development areas, the consent holder shall promote consideration of the Waikato Regional Council publication 'Sustainable Subdivision Development – An Environment Waikato Perspective' (WRC, 2006).	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>Waikato Regional Council's publication of Waikato Stormwater Management Guidelines (2018) is being promoted for all new stormwater diversion and discharge activities in urban development areas.</p> <p>Reviews and involvement during the consent application and submission level is currently being undertaken when requested, however this was limited during the reporting period.</p>	
<b>Status Reasoning</b>	The Waikato Regional Council publication 'Sustainable Subdivision Development – An Environment Waikato Perspective' (WRC, 2006), has been superseded by the Waikato Regional Council's publication of Waikato Stormwater Management Guidelines (2018)	
<b>Action Required</b>	<b>For all new stormwater diversion and discharge activities in urban development areas, the consent holder shall promote consideration of the Waikato Regional Council publication of Waikato Stormwater Management Guidelines (2018)</b>	<b>Full compliance</b>
Schedule 29)	A In addition to the requirements of Condition 28 of this consent, the consent holder shall promote the implementation of Low Impact Urban Design principles and/or construction of stormwater management devices in urban development areas, to avoid and/or mitigate any potential adverse effects of new stormwater diversion and discharge activities, and to ensure that the condition requirements of this consent are met.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>WDC approach to stormwater management includes the promotion of low impact design principles. WDC's and WRCs involvement in the consenting process ensures water sensitive developments are being approved and constructed. WSL, on behalf of WDC will continue to attend pre-consent application meetings and engineering design meetings. The Safety in Design requirements also facilitates WDC involvement.</p> <p>Reviews and involvement during the consent application and submission level is currently being undertaken when requested, however this was limited during the reporting period.</p>	
<b>Status Reasoning</b>		
<b>Action Required</b>		<b>Full compliance</b>
Schedule 30)	A All stormwater management devices associated with the municipal stormwater system shall be maintained in good working order. The consent holder shall carry out all stormwater management device maintenance as necessary and, where practicable, within one week of receipt of notice in writing from the Waikato Regional Council to do so.	
<b>Evidence</b>	<p>The consent holder states in their annual report that:</p> <p>Catchpits are maintained by the roading alliance. Catchpit inserts required additional maintenance. Extreme Zero Waste undertake catchpit insert maintenance on a monthly basis.</p> <p>A review of the maintenance program for stormwater management devices is currently underway. Currently hand maintenance is only available.</p> <p>Access to a vacuum pump is currently being sourced.</p>	
<b>Status Reasoning</b>	WDC has stated the current arrangements and equipment for emptying and cleaning of catchpits and Enviropods is insufficient and this leads to overflows and blockages.	
<b>Action Required</b>	<b>Please investigate and provide a solution to the requirements for adequately undertaking maintenance and emptying of catchpits to avoid any adverse effects from blockages.</b>	<b>Low priority non-compliance</b>

<p>Schedule 31)</p>	<p>A The consent holder shall prepare a Stormwater Management Plan for the municipal stormwater system, and the stormwater diversion and discharge activities that are authorised by this consent. The Stormwater Management Plan shall be prepared in consultation with the Waikato Regional Council, Waikato-Tainui, Te Kotuku Whenua and other key stakeholders. The operational procedures and management initiatives that are detailed and implemented through the plan will largely assist the consent holder to achieve the condition requirements of this consent. The Stormwater Management Plan shall therefore be submitted to the Waikato Regional Council for approval within 12 months of the commencement of this consent unless otherwise approved by Environment Waikato. This approval shall be limited to whether the Stormwater Management Plan complies with the requirements of this condition and is in accordance with best practice. The Stormwater Management Plan shall record the way in which the municipal stormwater system is operated, and shall include methods to avoid, remedy and mitigate the adverse effects of stormwater diversion and discharge activities on the environment. The Stormwater Management Plan shall be reviewed and updated on a five yearly basis, or earlier if necessary to address specific management issues that arise, and as a minimum, shall detail the following information: a) The relationship and integration of the Stormwater Management Plan with other consent holder planning instruments and regulatory systems, including those that are utilised to assist the management of the municipal stormwater system; 105644 (Huntly Urban Area) b) A plan or drawing of the municipal stormwater system showing all key features, including administrative area, hydrological catchments, physical reticulation system, stormwater management devices and receiving waters; c) A description of the municipal stormwater system, including infrastructure details, contributing catchments, existing land uses and receiving water descriptions (including locations, water quality, ecological and hydrological characteristics, and the existing uses and values of receiving waters); d) A description of municipal stormwater system operation and maintenance procedures, including operation and maintenance procedures associated with all stormwater treatment devices; e) Identification of High Risk Facility Sites and other potential sources of stormwater contaminants within reticulated catchments (including sources of 'routine' and 'non-routine' contaminant discharges to the stormwater system); f) Management initiatives and implementation methods to avoid, remedy or mitigate 'routine contaminant' discharges to the municipal stormwater system. This should include the preparation and implementation of a Stormwater Quality Improvement Programme as required by Condition 26 of this consent and a review of the efficiency of catchpit cleaning and street sweeping operations; g) A Spill Response Plan, including detailed Standard Operating Procedures, for 'non-routine contaminant' spill incidents within reticulated catchments. The Spill Response Plan should also detail communication linkages with other key stakeholders and emergency response agencies who have administrative responsibilities associated with these types of incidents; h) Management initiatives and implementation methods to minimise 'formal' discharges from the municipal wastewater system to the municipal stormwater system; i) Management initiatives and implementation methods to identify and discontinue 'informal' wastewater system discharges to the municipal stormwater system; j) Management initiatives and implementation methods to identify and remedy adverse scour and erosion effects to land and the beds of receiving water bodies; k) Management initiatives and implementation methods to minimise adverse flooding effects to land and property; l) Management initiatives and implementation methods to avoid, remedy or mitigate adverse effects on aquatic ecosystems; m) Management initiatives and implementation methods to identify and remedy structures and stormwater management devices that are impeding the upstream and downstream movement of fish; n) Management initiatives and implementation methods to maintain and enhance the aesthetic appearance of structures and stormwater management devices associated with municipal stormwater diversion and discharge activities; o) Management initiatives and implementation methods to encourage the implementation of Low Impact Urban Design principals and/or construction of stormwater management devices in urban development areas; p) A register of all stormwater management devices associated with the municipal stormwater system, including their location, contributing catchment area, operational procedures and maintenance requirements; q) Management initiatives and implementation methods to undertake community and stakeholder education programmes effective over all urban communities. This should include the preparation and implementation of a Stormwater Education Programme as required by Condition 27 of this consent; r) Management initiatives and implementation methods to minimise erosion of open earthen drains, the accumulation of rubbish in these drains, and the accumulation of rubbish in these drains; s) Management initiatives and implementation methods to review, identify and implement Best Practicable Options; and t) A prioritised schedule for implementing the procedures, management initiatives, implementation methods and other requirements identified in consent conditions and the Stormwater Management Plan.</p>
<p><b>Evidence</b></p>	<p>The consent holder states in their annual report that:</p> <p>The proposed SMP has been developed in consultation with stakeholders and has been approved by Waikato Regional Council.</p> <p>A review of SMP is in progress and due to be submitted to WRC in November 2020.</p>

<b>Status Reasoning</b>	The SMP is under a significant review in conjunction with stakeholders and WRC, a revised and updated SMP is expected early in 2021 for approval by WRC	
<b>Action Required</b>	<b>Please submit a revised SMP for approval by WRC before 28 February 2021</b>	<b>Full compliance</b>
Schedule 32)	A The consent holder shall establish and retain for the duration of this consent a Tangata Whenua and Key Stakeholder Liaison Group. The consent holder shall provide reasonable organisation and administrative support to facilitate the development and ongoing role of this Liaison Group. Membership of the Liaison Group shall be determined as a minimum in consultation with the Waikato Raupatu Trustee Company, Te Kotuku Whenua and Whaingaroa Harbour Care. i) The Liaison Group shall meet at least annually to exercise the functions set out below. ii) The Liaison Group shall establish its own meeting protocols having regard to the customary practices of tangata whenua and those established between the consent holder, Waikato-Tainui, Te Kotuku Whenua or any other mana whenua group and shall operate in accordance with the Treaty of Waitangi principles of consultation, active participation and partnership. iii) The functions of the Liaison Group shall include, but not be limited to, the following: a) Review the general performance of Waikato District Council's Municipal Stormwater System and the discharges including any changes to its operation; b) Review of the results of monitoring and the associated assessment of monitoring information carried out in accordance with the conditions of this consent. c) Receipt of and comments on the Annual Report; d) Receipt of and comments on the Stormwater Management Plan (and any subsequent updates to this plan); e) Receipt of and comments on the Monitoring Programme (and any subsequent updates to this plan); f) To make suggestions to the consent holder and/or Waikato Regional Council as to any physical measures and initiatives further needed to address actual or potential effects from the municipal stormwater system; g) To make suggestions as to any additional investigations the consent holder might undertake in respect of actual or potential effects; h) To make recommendations to the Waikato Regional Council not later than one month prior to the dates specified in condition 35 on issues raised by the group members relating to, amongst other matters, the Stormwater Management Plan and the Monitoring Programme,; and i) Consideration of other issues raised by members of the group.	
<b>Evidence</b>	The consent holder states in their annual report that:  No liaison group meetings occurred during the 2019/2020 reporting period.  WDC will re-establish the stormwater liaison group in 2021 and undertake the required consultation.	
<b>Status Reasoning</b>		
<b>Action Required</b>	<b>Please undertake liaison group meetings as required.</b>	<b>Minor technical non-compliance</b>
Schedule 33)	A Within 12 months of the Crown settling any claim made under the provisions of the Treaty of Waitangi Act 1975 Waikato Regional Council may, following service of notice on the Consent Holder, commence a review of the conditions of this consent pursuant to s128(1)(a) of the RMA, for the purpose of ensuring that this consent is in alignment with the provisions of any such settled claim.	
<b>Evidence</b>	The consent holder states in their annual report that:  WDC has not been served notice with regard to any review of consent conditions with respect to a Treaty Settlement.	
<b>Status Reasoning</b>		
<b>Action Required</b>		<b>Not assessed</b>
Schedule 35)	A The Waikato Regional Council may at any time during the years of 2011, 2013, 2018 and 2023 serve notice on the consent holder under section 128(1) of the Resource Management Act 1991, and commence a review of the conditions of this consent for any of the following purposes: a) To review the effectiveness of the conditions of this consent in avoiding, remedying or mitigating any adverse effects on the environment from the exercise of this consent, and if necessary to remedy or mitigate such effects by way of further or amended conditions; b) To require the consent holder to adopt the Best Practicable Option to prevent or minimise any adverse effects on the environment that result from the exercise of this consent; c) To review the monitoring undertaken by the consent holder, and if necessary to amend and/or introduce new conditions to monitor any actual and potential effects on the environment that result from the exercise of this consent. Costs associated with any review of the	

	conditions of this consent will be recovered from the consent holder in accordance with the provisions of section 36 of the Resource Management Act 1991.	
<b>Evidence</b>	Next review period is available in 2023	
<b>Status Reasoning</b>		
<b>Action Required</b>		<b>Not assessed</b>
<b>Authorisation Compliance:</b>		<b>Partial compliance</b>

#### 4 SUMMARY OF COMPLIANCE

Based on the conditions selected for monitoring, compliance has been assessed as:

<b>Authorisation</b>	<b>Authorisation Description</b>	<b>Compliance Status</b>
AUTH105646.01.01	Divert & discharge urban stormwater & associated contaminants at multiple locations to Raglan Harbour/estuary & land, & use discharge structures, within the vicinity of Raglan urban area	Partial compliance

**Overall Site Compliance:                      Partial compliance**

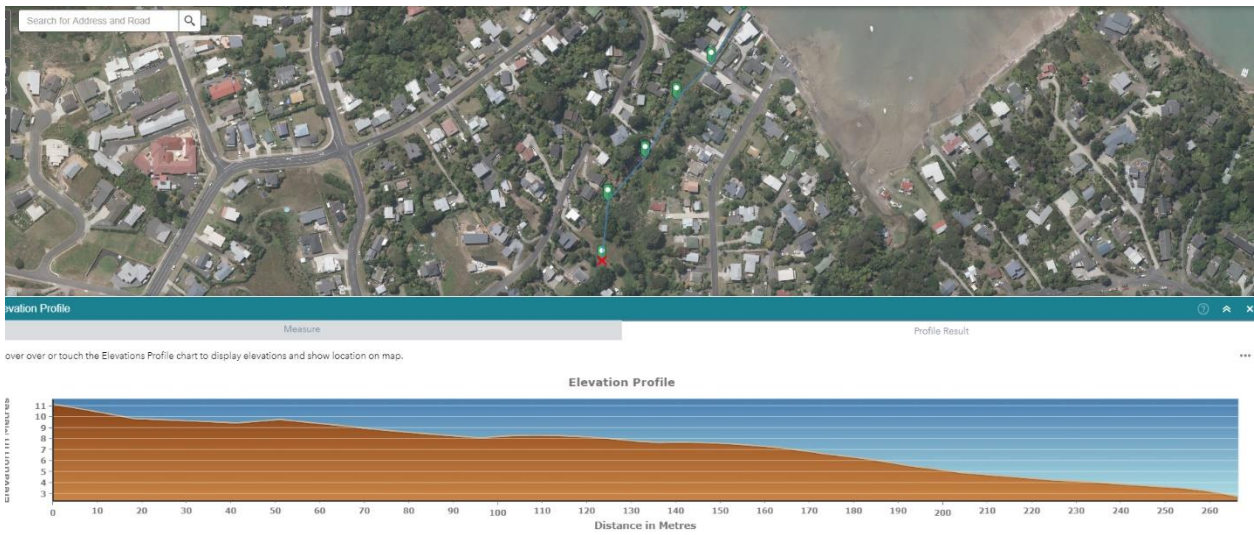
#### 5 DISCUSSION AND CONCLUSIONS

The consent holder has entered into a contractual partnership with WSL to operate their stormwater systems throughout the district. WSL has in turn employed a dedicated stormwater engineer who has prioritised the annual report for these sites, and Raglan in particular, to improve their compliance in annual reporting. The annual report has been totally redesigned and formatted and now also includes all of the WDC stormwater sites in one comprehensive document. They have also instigated a new internal scoring system based on weighted scores for various conditions which should allow a comparable scoring system and the ability to measure improvements over time.

Raglan stormwater compliance was in significant non-compliance for the last compliance period and an abatement notice (AN) was issued along with a formal warning. WSL have been working through the issues in the AN (doc ref 16633123) and many have been completed or are ongoing with a solution in sight. WSL have been meeting regularly with Waikato Regional Council compliance staff to brief them and keep them in the loop with progress on the resolutions.

A major part of their compliance issue is the provision of a new updated and revised stormwater management plan (SMP). This was originally scheduled for submission in November 2020 however due to the complexity of the plan it has been postponed until early in 2021.

The solution to the flooding issues at Cambrae Road has been agreed and a new larger culvert will be installed to allow a higher flow through the property at times of high rainfall. The elevation between the flooded property due to the culvert backing up and sea level is 11 metres (see map below) so it is unlikely that any of the flooding is due to high tides backing up through the flap valve gate at the Lorenzen Bay end. It is, I suspect, solely due to an undersized culvert which may also be partially blocked by sediment and vegetation restricting flows leading to localised flooding upstream of the culvert.



I acknowledge and welcome the improved community liaison efforts relating to this activity by WSL in keeping the local community apprised of the challenges and improvements relating to the stormwater system in Raglan.

The following table 15.6.2 lists the complaints that have been reported to WDC/WSL relating to or initially classified as stormwater incidents.

### 15.6.2 Stormwater Summary Table

Stormwater incidents Summary Table - Raglan	
Summary Description	Number
<b>Total number of CRM reported incidents</b>	<b>28</b>
<b>Flooding Occurred During Incident</b>	
Closed out	18
Outstanding	2
<b>Maintenance Issue</b>	
Closed out	8
Outstanding	2
<b>Other/Misc</b>	
Private Drainage Issue	12
Vandalism incidents	0
Roading asset forwarded to Alliance	1
Assistance requests/Health and Safety Issue	0
Water supply Incidents	2
Wastewater Incidents	1 Refer Wastewater summary table
<b>Summary</b>	
Closed out incidents	25
Outstanding Incidents	3

There are 3 outstanding items. One has been transferred to the Roding Alliance for follow up. The other two require further maintenance and have been scheduled for completed within the next month.

20 of the reports identify flooding, of which 12 relate to private drainage, 6 related to maintenance issues and the remaining 2 are not related to stormwater (water supply).

## 6 SUMMARY OF ACTIONS REQUIRED

The following actions are required to be undertaken:

Resource consent	Condition Number	Action Required
AUTH105646.01.01	3	Please ensure all stormwater assets are recorded correctly on the GIS mapping system to reflect what is physically on the ground in Raglan
AUTH105646.01.01	8	Please submit an updated and revised monitoring plan for Raglan stormwater that encompasses items a) to g) in the condition above.
AUTH105646.01.01	Schedule A 1)	The consent holder is aware of the shortcomings with respect to maintaining stormwater assets and is taking steps to improve the situation. the consent holder is also currently undertaking a review of the monitoring program for the area.
AUTH105646.01.01	Schedule A 2)	Further sampling will be required under the new monitoring plan to better understand any potential or actual adverse effects on the receiving environment.
AUTH105646.01.01	Schedule A 3)	Please provide documented evidence of any assessment of best practicable options when deciding on which stormwater assets to construct or install in the annual report.
AUTH105646.01.01	Schedule A 4)	Please ensure more formalised reporting is included for 2020/2021 annual report.
AUTH105646.01.01	Schedule A 5)	Please keep WRC advised of the works to resolve the flooding issue in Cambrae Road Raglan.
AUTH105646.01.01	Schedule A 12)	Investigate and make improvements to available equipment and staff in order to undertake adequate frequency of catchpit emptying to avoid blockages and overflows.
AUTH105646.01.01	Schedule A 13)	Implement improved equipment and frequency of catchpit emptying to prevent blockages and flooding/overflows. Any new and/or replacement stormwater catchpits shall be further capable of capturing the majority of floatable contaminants, such as oil and grease, when constructed.
AUTH105646.01.01	Schedule A 14)	More work is required to be done to ensure all stormwater quality treatment devices that form part of the municipal stormwater system are operated and maintained to provide the best practicable option for stormwater contaminant removal efficiency at all times.
AUTH105646.01.01	Schedule A 17)	Ensure that WDC/WSL reports all significant spills from the wastewater system as they are notified of them.
AUTH105646.01.01	Schedule A 22)	The consent holder must manage the municipal stormwater system to minimise the discharge of any substance that is likely to cause the production of conspicuous oil, or grease films, scums or foams, or floatable suspended materials after reasonable mixing.
AUTH105646.01.01	Schedule A 24)	Undertake microbial sampling in line with the revised sampling programme due in early 2021 and submit results to WRC for assessment.
AUTH105646.01.01	Schedule A 25)	Provide a new revised sampling plan and undertake sampling as required to demonstrate any adverse effects, or lack of, on the aquatic ecosystem.
AUTH105646.01.01	Schedule A 26)	Ensure stormwater quality initiatives are included as part of the revised SMP
AUTH105646.01.01	Schedule A 27)	Please ensure details of the councils stormwater education program are included in the stormwater management plan.

AUTH105646.01.01	Schedule A 28)	For all new stormwater diversion and discharge activities in urban development areas, the consent holder shall promote consideration of the Waikato Regional Council publication of Waikato Stormwater Management Guidelines (2018)
AUTH105646.01.01	Schedule A 30)	Please investigate and provide a solution to the requirements for adequately undertaking maintenance and emptying of catchpits to avoid any adverse effects from blockages.
AUTH105646.01.01	Schedule A 31)	Please submit a revised SMP for approval by WRC before 28 February 2021
AUTH105646.01.01	Schedule A 32)	Please undertake liaison group meetings as required.

## 7 RECOMMENDATIONS FOR WAIKATO REGIONAL COUNCIL

Overall, I am pleased to see that the consent holder is taking their responsibilities towards compliance with stormwater activities a lot more seriously and have provided more resource into improving compliance this year.

I consider that they are working their way through the required actions detailed in the abatement notice and have either achieved or are continuing to complete all the required actions at a reasonable pace considering some of the actions are quite complex and time consuming.

I recommend the abatement notice remains in force until such time that all the required actions have been completed to a satisfactory level. In response to the compliance status for this year of partial compliance I recommend that Waikato Regional Council issues the consent holder a **Letter of Direction** confirming the remaining actions and any new issues identified in this year's audit and requiring a timeframe for when these actions will be completed by to give some surety of compliance during the remainder of the 2021 financial year.

I also recommend that this site retains its focus area 1 status for next year due to the ongoing compliance issues and increased public interest and attention placed on the stormwater sector by central government.



Edward Prince  
**Senior Resource Officer - Infrastructure  
Resource Use**

**Date: 28 January 2021**

### 7.1 Decision

I have reviewed this audit report and agree with the recommendations.



Hugh Keane  
**Team Leader - Infrastructure  
Resource Use**

**Date: 29 January 2021**



## APPENDIX 1

### Compliance Status for Individual Conditions

Compliance Status	Description
Not assessed	Monitoring of this condition was not undertaken during this monitoring event
High priority non-compliance	The non-compliance has the potential for, or has resulted in, significant adverse effects on the environment.
Medium priority non-compliance	There is non-compliance with limits or other direct controls on adverse effects; and The non-compliance has the potential for, or has resulted in, a greater than minor increase in the level of effects authorised.
Low priority non-compliance	There is non-compliance with limits or other direct controls on adverse effects; and The non-compliance has the potential for, or has resulted in, a less than minor increase in the level of effects authorised; and/or There has been a significant technical non-compliance such as a failure to collect or supply self-monitoring data.
Minor technical non-compliance	There is non-compliance with a condition, or part of a condition, that does not directly control adverse effects; and The non-compliance was not significant in the management of effects. For example a short delay in supplying data or meeting a deadline for a report
Full Compliance	The condition has been complied with

### Compliance status for individual consents and the entire site

Compliance Status	Description
Not assessed	Monitoring has not been undertaken at this site during the current financial year
Significant non-compliance	There has been a high priority non-compliance; and/or There have been several medium priority non-compliances.
Partial compliance	There has been a medium priority non-compliance; and/or There have been several low priority non-compliances.
High level of compliance	There has been a low priority non-compliance; and/or There have been several minor technical non-compliances.
Full compliance	All conditions that include limits or other direct controls on adverse effects have been complied with. A small number of minor technical non-compliances may have occurred.