Water Services Delivery Plan

New Plymouth District Council

NPDC Stormwater

April 2025

This is an incomplete working draft

Contents

Part A: Statement of financial sustainability, delivery model, implementation plan and assurance

Statement that water services delivery is financially sustainable

Financially sustainable water services provision

New Plymouth District Council's (NPDC) preferred delivery model for stormwater is by way of an In-House Business Unit. NPDC confirms that an In-House Business Unit meets the Financially Sustainable delivery assessment as outlined as Part D of this plan.

NPDC intends to complete transitional arrangements by way of ringfencing water revenues and the introduction of the new planning and accountability framework for water services by 31 March 2026.

NPDC can confirm that the In-House Business Unit meets the financial sustainability requirements, specifically:

- Projected waters revenue is sufficient to cover the costs of delivering water services, including sufficient infrastructure investment and meeting increasing regulatory requirements.
- The proposed level of investment as outlined in the NPDC Long-Term Plan is sufficient to meet levels of services, regulatory requirements and provide for growth. In addition, the proposed level of investment can be fully funded by projected revenues
- The projected council borrowings are within council borrowing limits and meet associated LGFA covenants.

Proposed delivery model

Proposed model to deliver financially sustainable water services

The proposed model to deliver water services

New Plymouth District Council intends to continue to deliver stormwater services independently and is therefore not seeking to partner with other councils beyond the measures already in place (shared control systems team, common contracts (e.g. chemical supply) and common Standard for Land Development and Subdivision Infrastructure).

By maintaining an In-House Business Unit for stormwater, NPDC will continue to provide high quality water services to our community while ensuring there is sufficient capacity to increase investment in infrastructure and meet regulatory requirements.

Via the reinforcement of existing accounting rules/processes, NPDC will ensure that stormwater services revenues are ringfenced and therefore separate from other council financials. NPDC will ensure the appropriate oversight of stormwater delivery priorities, investment programme and ensure adherence to current and future stormwater regulations.

Increased costs relating to the new planning and accountability requirements have been built into financials, as well as any additional overheads to establish and implement new committee processes and ringfence financials.

Keeping stormwater services In-House was chosen as our preferred delivery model due to the following:

a) Highly achievable with minimal change to our people, processes and tools and therefore negligible disruption to service delivery.

b) Benefit of all council revenue to offset against stormwaters debt whilst ensuring there is sufficient debt headroom to service increased infrastructure investment.

c) Minimal increased costs/overheads to achieve financial separation

d) Local accountability and responsiveness to New Plymouth community needs are retained, whilst continuing to explore a level of enhanced shared services with neighbouring councils.

There are no changes to revenue collection methods anticipated.

Implementation plan

Implementation plan

Implementing the proposed service delivery model

As NPDC is proposing to continue delivering stormwater services independently by way of an In-House Business Unit, the following actions will be completed to ensure the delivery of stormwater services is financially sustainable by 30 June 2028:

a. Confirmation of ringfencing arrangements for stormwater services delivery
b. Development of a three-yearly stormwater services strategy, independent of the LTP
c. Implementation of a new reporting and accountability framework
d. Development of stormwater services financial statements and other required reporting mechanisms.

Once this plan is accepted, it is anticipated that the above (with the exception of the Waters Services Strategy due for completion prior to 1 July 2026) will be actioned within *3 months.*

NPDC will have therefore completed its transition by *31 March 2026.*

Consultation and engagement

Consultation and engagement

Consultation and engagement undertaken

Community consultation was undertaken, including three options; Enhanced Status Quo (In-House Business Unit), NPDC Water Services CCO and Regional/Taranaki Water Services CCO.

Consultation was held between 30 April and 30 May 2025, with the results of consultation reported to full Council to inform a final decision on 22 July 2025.

{Summary of consultation findings}

Assurance and adoption of the Plan

Assurance and adoption of the Plan

The Act requires that each Plan that is submitted to the Secretary for Local Government for acceptance must include a certification, made by the Chief Executive of the council(s) to which the Plan relates, that:

- *The Plan complies with the Act; and*
- *The information contained in the Plan is true and accurate.*

While the Act does not require Plans to be verified independently, to ensure that the information is true and accurate, Councils may wish to either seek independent advice to verify the accuracy of information provided in the Plan or assess their Plan in-house. While not a mandatory requirement, we recommend considering the matters set out below when certifying the Plan.

When certifying the Plan, the Chief Executive of the council(s) may include commentary on:

- *The levels of confidence in the underlying information included in the Plan. This could include comment on the level of confidence in regulatory compliance, asset condition, investment requirements, asset valuations or certainty around financial projections.*
- *Any material risks or constraints that may impact on the delivery of water services, the ability to implement the Plan or to achieve financially sustainable water services provision by 30 June 2028.*
- *Any assurance processes undertaken to verify the accuracy of information included in the Plan.*

Council resolution to adopt the Plan
Councils must adopt their Plans by resolution. In order to demonstrate compliance with this requirement, it is expected that councils will include the resolution date and a copy of the decision to adopt the Plan. For a joint Plan, this resolution to adopt the Plan must be completed by each council to which the Plan relates.
Certification of the Chief Executive of *[Council name]*
The Council Chief Executive can complete the following certification statement to demonstrate compliance. For joint Plans, this certification statement should be modified to certify only the information provided by the council in the preparation of the Plan, as opposed to all information included in the Plan. I certify that this Water Services Delivery Plan: • complies with the Local Government (Water Services Preliminary Arrangements) Act 2024, and • the information contained in the Plan is true and accurate. Signed: _____ Name: _____ Designation: _____ Council: _____ Date: _____

Part B: Network performance

Investment to meet levels of service, regulatory standards and growth needs

Investment required in water services

Serviced population

N/A for stormwater

Serviced areas

Serviced areas (by reticulated network)	Water supply (scheme – number of connections)	Wastewater (scheme – number of connections)	Stormwater
Residential areas (If more than one identify separately)	New Plymouth - 26,976 Inglewood - 1,683 Oakura - 778 Okato - 282	New Plymouth - 27,690 Urenui Domain - 140 Onaero Domain - 20	13 Urban Stormwater Catchments in communities of New Plymouth, Bell Block, Waitara, Inglewood, Urenui, Onaero, Lepperton, Egmont Village, Oakura and Okato
Non-residential areas (If more than one identify separately)	New Plymouth - 2,316 Inglewood – 140 Inglewood, Dudley Rd User Group (non-potable) – 2 Oakura - 33 Okato – 45 Waitara Industrial Supply - 0	New Plymouth - 2,195	Industrial area of Bell Block and other smaller industrial areas within larger urban catchments
Mixed-Use rural drinking water schemes (where these schemes are not part of the council's water services network)	None	n/a	n/a
Areas that do not receive water services (If more than one identify separately)	Egmont Village - 129 Tongaporutu - 50 Rural areas across the district	Egmont Village - 129 Lepperton - 139 Okato - 254 Onaero - 60 Urenui - 170 Tongaporutu - 50 Rural areas across the district	Rural areas apart from stormwater assets related to roading network. National Park
Proposed growth areas • Planned (as identified in district plan) • Infrastructure enabled (as identified and funded in LTP)	Structure Plan Development Areas (SPDA): Puketapu SPDA – 647 Carrington SPDA - 231 Patterson SPDA – 165 Junction SPDA – 79 Johnston SPDA - 135		

The Councils target level of service and actual levels of service for the 22/23 FY are shown in the table below for each activity

Measure	Target	Result
Stormwater		
The number of flooding events in the district per financial year.	0	0
The number of habitable floors affected in each flooding event (per 1,000 properties connected to the Council's stormwater system	≤1	0
The median response time to a flooding event (from the time that the Council receives notification to the time service personnel reach the site).	<1 hr	0.55
The number of complaints received about the performance of the Council's stormwater system (per 1,000 properties connected)	<8	3.73
The number of abatement notices received.	0	0
The number of infringement notices received.	0	0
The number of enforcement orders received.	0	0
The number of convictions received.	0	0
Detention dams comply with the Building (Dam Safety) Regulations 2002	Full compliance	Non compliant

Assessment of the current condition and lifespan of the water services network

The age and condition of the water services networks is provided in the table below and more information can be found in sections 5 and 6 of the asset management plans.

The condition assessment for the below ground water assets is predominantly age based with some PCat, EPulse and AC coupon sampling done on specific assets and/or to inform the wider age-based assessment. Below ground stormwater condition assessment is a mix of CCTV and age-based condition assessment. For stormwater 20% of the network by length had been inspected between 2020 and 2024.

For above ground assets, pipe bridges have scheduled inspections, and any issues identified are rectified but the condition information is not recorded. There is no formalised condition assessment program in place for any of the other above ground assets.

The backlog of renewals for Stormwater is around $25M. The funding detailed in this plan is expected to significantly reduce or eliminate these backlogs. The below ground assets are generally considered to be well maintained with minimal if any maintenance backlog. However, many of the above ground assets are not accurately captured in the asset management system and do not have the required maintenance schedules. Therefore, it is expected that there could be a significant maintenance backlog for these above ground assets.

Critical asset identification for Stormwater and Flood Protection has been carried out by the Asset Owner, in accordance with the adopted NPDC critical asset definition. The critical assets identified in the table below reflect that. The numbers represent aggregated asset services. Some of these are made up of multiple individual assets.

Parameters	Stormwater
Average age of Network Assets	38 years
Critical Assets	10 Identified - *uncertain*
Above ground assets • Treatment plant/s • Percentage or number of above ground assets with a condition rating • Percentage of above –ground assets in poor or very poor condition	1 SW pump station, – *highly reliable* [38%]- uncertain [0%] - very uncertain
Below ground assets • Total Km of reticulation • Percentage of network with condition grading • Percentage of network in poor or very poor condition	 [317 Km] - *reliable* [96%] - *reliable* [10%] – *less reliable*

Source: The data in the table is from Taumata Arowai NEPM reporting, as at 30 June 2024.

The data in the text is from the AMP's. These sources differ slightly due to the date upon which the data was obtained.

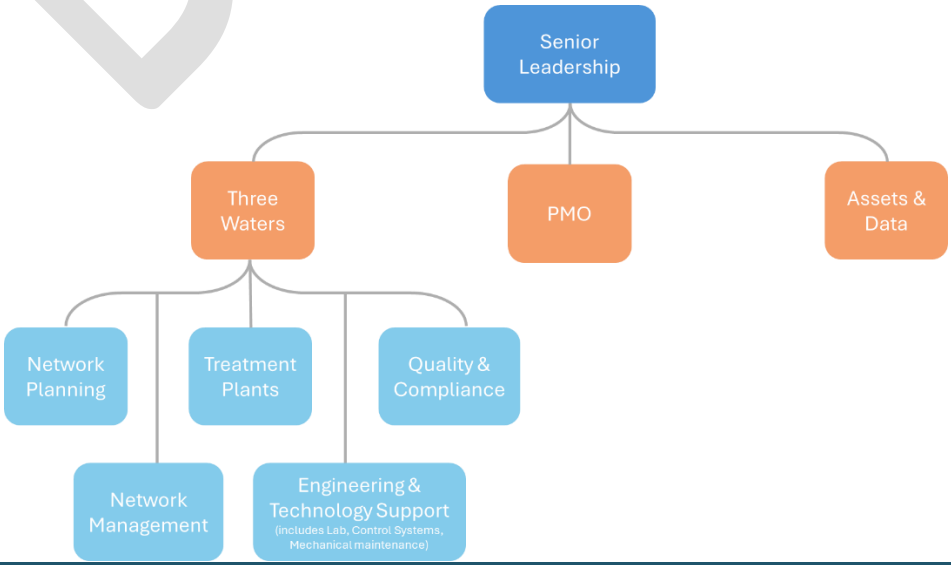
Asset management approach

Asset Management Framework

NPDC follow ISO55001/55002 (asset management) and ISO 9001 (quality management) in their approach to asset management. More specifically the approach is captured in a hierarchy of documents that as shown in the figure below. These documents are updated on a 3yr cycle in line with the LTP.

Service Delivery Mechanisms

The structure of the key teams that deliver the Three Waters activity for council is shown in the figure below. In addition, there are also a number of other teams including Finance, HR, IT etc that the provide supporting services.



The maintenance of the pipe network is undertaken by City Care under contract. The operations and expertise regarding the network's functionality are maintained in-house. Maintenance of the pipe network is well understood and covered by maintenance schedules. The creation of detailed maintenance schedules for the mechanical equipment is an ongoing project, with further work required.

Asset Management System

Council uses a number of systems to manage its assets, financial information and customer information including:

- TechOne Enterprise Asset Management system (TechOne/ EAM) – manages financial information, customer information and requests, asset registers and history, work order management and maintenance scheduling. It is linked with the TechOne Enterprise Content Management (ECM) system which manages records.
- ArcGIS – manages spatial records (GIS).
- RedEye – manages all drawings including concept, working and as-built drawings.
- SharePoint – supports the sharing of working and in-draft documentation, the collection of data into lists and the sharing of information and processes to internal parties via 'wiki' pages. Resource consents are stored in SharePoint and the system identifies and retrieves consent conditions and provides quality assurance.
- Water Outlook - for gathering and managing the Supervisory Control and Data Acquisition (SCADA) system and processing data.
- Water Online - for reporting compliance data to the Ministry of Health.
- Infoworks WS and ICM - for network modelling.

Identification of Capital Projects

The Network Planning team are responsible for identification of capital projects based on the condition, level of service issues and growth expectations.

Modelling of the stormwater catchments is currently underway and expected to be completed by 2030.

Once the need for a capital project has been identified a business case is developed following the councils P3M (Portfolio, Program and Project Management) Framework and handed over to the Projects team for delivery.

Statement of regulatory compliance

Compliance

Currently NPDC is compliant with all regulatory requirements with the following exceptions:

- Four abatement notices regarding fish passage at various in-stream culverts in the district. Work to address these is complete and awaiting TRC signoff.
- The Highlands Park Dam is classified as dangerous under the Building (Dam Safety) Regulations 2022. Work is underway to determine how this will be addressed and budget has been allowed for implementing the outcome of this investigations by 2034.

More details on NPDC's compliance are provided in the table below and in Appendix A.

Consents requiring renewal in the next 10 years.

NPDC have 37 consents expiring over the next 10 years - 11 for water (of which 3 will be surrendered), 14 for wastewater (of which seven will be surrendered) and 12 for stormwater (of which one will be surrendered). All consents are considered to minor and/or low risk with the following exceptions:

- *Consents 5163, 1275, 0609 – To discharge stormwater from industrial areas to water:* These consents expire in 2026, 2026 and 2032 respectively. Based on Iwi expectations, and potential changes to Regional Freshwater Plan, the reconsenting process for industrial stormwater runoff will likely include significant changes to consent conditions, monitoring, and treatment of stormwater. To fund this and similar work 300K/annum is budgeted from 28/29 onwards.

Building (Dam Safety) Regulations 2022

NPDC's flood protection activity (proposed to be included with stormwater) owns and operates 4 classifiable dams under the Building (Dam Safety) Regulations 2022. The Highlands Park Dam is classified as dangerous as when it was built it did not

meet the criteria for a classifiable dam so was not built to meet the requirements. Work is currently underway to determine how this will be addressed.

The remaining three dams are currently in the process of getting their Dam Safety Assurance Program approved by TRC. These programs identify minor upgrades that are required for the Huatoki and Mangatoku Dams and a spillway upgrade for the Waimea Dam. These works have been budgeted for in the LTP.

NPDC's New Plymouth Water Supply Scheme is reliant on two dams that form Lake Mangamahoe. These are owned and operated by Manawa Energy who are responsible for ensuring compliance with the regulations but the NPDC water activity is responsible for 50% of any costs. These costs have been budgeted for in the LTP.

Anticipated Future Regulatory Requirements

There are currently no anticipated future regulatory requirements that NPDC will not meet. However, there are a number of items for which there is potential for compliance challenges depending on the details of the final regulation. These are:

- The Taranaki Regional Freshwater Plan is expected to updated in 2025. This has the potential to impact on the following:
    - There is potential for significant changes in the way stormwater is consented including the possibility of utilising a comprehensive consent and increased monitoring and treatment requirements. The Council is managing this risk through the development of catchment management plans for all urban areas by 2034 and budgeting 300K/annum for stormwater treatment commencing in year 2028. No allowance has been made for increased monitoring as it is the Council's position that monitoring of stormwater discharges does not provide meaningful data.

Note: The numbers above and consents detailed in Appendix A do not include 52 land use consents for Stormwater, primarily culverts.

Parameters	Stormwater Schemes/catchments
Resource Management	
• Significant consents (note if consent is expired and operating on S124)	Stormwater discharge & Network [*Appendix A*]
• Expire in the next 10 years	[*See above – statement of Regulatory Compliance]*

• Non-compliance:
  • Significant risk non-compliance
  • Moderate risk non-compliance
  • Low risk non-compliance
	NPDC has three active non-compliances that are considered resolved and awaiting signoff

• Active resource consent applications	Four awaiting final decision

• Compliance actions (last 24 months):
  • Warning
  • Abatement notice
	[N/A]
	[EAC-23405, EAC-23407, EAC-23416, EAC-24647]

• Infringement notice • Enforcement order • Convictions	[N/A] [N/A] [N/A]

Capital expenditure required to deliver water services and ensure that water services comply with regulatory requirements

The sections below provide a brief description of the current state of planning for each water activity, the key drivers for investment and the significant projects. Please note the project values are uninflated and across the 30 years considered in the financial model.

Water Supply

To be delivered through CCO

Wastewater

To be delivered through CCO

Stormwater

The Highlands Park Dam is currently classified as dangerous and does not comply with the Building (Dam Safety) Regulations 2022. Otherwise the stormwater activity is largely compliant with regulatory requirements and significant investment meeting regulatory requirements is not required.

The New Plymouth District Council has recently adopted its Stormwater Vision and Roadmap and is in the process of developing network models and catchment management plans to better understand the network. However, achieving its target level of service and level of protection across the districts urban areas and responding to increased environmental expectations is estimated to cost in excess of $1B. This is expected to take generations to address, therefore the investment profile below is one of gradual improvement over the full 30yrs with significant work still required after this period. This is expected to be common with most other municipalities around the country.

Given this the key drivers for spend in the stormwater activity are compliance (Highlands Park Dam), addressing flooding, improving environmental outcomes, growth and renewals. The key projects over the next 30yrs are:

- Compliance with Dam Safety Regulations ($15.8M): Upgrading the Dams to ensure compliance with the Building (Dam safety) Regulations 2022, especially with respect to the Highlands Park Dam and the Waimea Spillway. This work is underway and scheduled to be complete by 2034.
- Waitara Stormwater Upgrades ($55.1M): There are a number of areas in Waitara that experience regular flooding (both nuisance and habitable floor flooding). This is driven by the originally development approach that gave minimal consideration for how stormwater would be managed. This project is to make progress towards addressing these flooding issues while ensuring that modern environmental considerations are taken into account.
- Estate Grove Stormwater Upgrades ($5.5M): Upgrading the stormwater system to address flooding issues.
- Mangaone Stormwater Upgrades ($12M): The creation of stormwater management infrastructure to allow the development of the smart Rd growth area between 2033 and 2036
- Stormwater Treatment Retrofits ($7.8M): The retrofitting of stormwater treatment devices to reduce the impact of the stormwater activity on the environment and make progress towards achieving the Stormwater Vision and Roadmap between 2028 and 2054.
- Mangotuku Tunnel Optimisation ($4.4M): Optimisation of capacity the Mangotuku Stormwater Diversion tunnel intake structure to address downstream flooding issues.
- Puketapu Area Stormwater ($37M): The creation of stormwater management infrastructure to allow the development of the Puketapu development area.
- Inglewood Stormwater Upgrades ($50M): Project to reduce flooding while ensuring that modern environmental considerations are taken into account and reduce I&I to the wastewater network in Inglewood

The table below summarises the projected investment for each water.

Projected investment in water services ($K)	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Stormwater										

Capital expenditure - to meet additional demand	2,147.6	1,253.0	1,691.4	2,167.9	3,493.9	2,296.9	2,925.7	6,595.2	12,438.8	7,044.4
Capital expenditure - to improve levels of services	3,297.2	7,816.5	6,502.0	7,546.6	8,149.6	7,870.4	14,289.4	18,754.4	12,948.4	9,959.4
Capital expenditure - to replace existing assets	1,266.9	3,526.5	5,713.4	9,836.9	8,258.8	6,780.5	5,936.7	8,018.0	7,587.4	8,112.0
Total projected investment for stormwater ($K)	6,711.7	12,596.0	13,906.8	19,551.4	19,902.3	16,947.8	23,151.8	33,367.6	32,974.7	25,115.8
Total projected investment in water services	6,711.7	12,596.0	13,906.8	19,551.4	19,902.3	16,947.8	23,151.8	33,367.6	32,974.7	25,115.8

Historical delivery against planned investment

New Plymouth District Council have delivered around 95% of both the renewals investment and overall CAPEX since 2018. This includes a doubling investment from around $23M in 2018/19 to a $53M in 2024/25. This increase is expected to continue to a peak of $84M in 2028/29 before decreasing to an average of around $70M towards the end of the 30yrs.

This increase has been managed through a range of measures including: the creation of a dedicated Three Waters Planning Team and significantly increased funding for planning, development and implementation of the P3M (Portfolio, Program and Project Management) Framework in 2020 including an increased focus on the creation of robust business cases, streamlining procurement though the creation of panel contracts and other long term broad delivery mechanisms. The 5% under delivery over this time is due a variety of factors including projects coming in under budget, consenting and other delays etc.

Delivery against planned investment	**Renewals investment for water services**				**Total investment in water services**			
	FY2024/25	**FY21/22 - FY23/24**	**FY18/19 - FY20/21**	**Total**	**FY2024/25**	**FY21/22 - FY23/24**	**FY18/19 - FY20/21**	**Total**

Total planned investment (set in the relevant LTP)	$16,620	$43,750	$30,870	91,240	53,370	$133,810	$71,015	258,195
Total actual investment	Not available yet	$41,900	$29,620	Not available yet	Not available yet	$126,870	$67,200	Not available yet
Delivery against planned investment (%)	**Not available yet**	**95.8%**	**96.0%**	**Not available yet**	**Not available yet**	**94.8%**	**94.6%**	**Not available yet**

To continue to improve delivery NPDC is:

- Continuing to invest in Three Waters planning. For stormwater this is the creation of Network Models and Catchment Management Plans for all catchments in the District.
- Appointed a panel of four consultants and 3 contractors to facilitate the design and delivery of the more routine Three Waters projects.
- Continuous improvement in the P3M Framework and its implementation.

The capital program has been designed to minimise peaks and troughs in the workload and where these do occur they have been smoothed over the preceding and subsequent years where possible. When they do occur the panel contracts and use of contract project managers is expected to be able to adsorb the additional work.

Part C: Revenue and financing arrangements

Revenue and charging arrangements

Revenue and charging arrangements

Charging and billing arrangements

Note: Due to timing this section has been completed based on the financial information in the 2024/34 Long-Term Plan. This will be updated by the budgets in the 2025/26 Annual Plan, which will in turn be used to update the numbers in the section below. As a result, these costs do not include the regulator levy or any allowance for additional regulation beyond what was in place in 2023.

NPDC have a consistent tariff structure across the District. All three waters have ringfenced funding and are run to generate a neutral balance sheet over time. NPDC has identified numerous council services including water, wastewater and stormwater and flood, supported by TechnologyOne software which allows for the grouping of cost centres into council activities.

Stormwater

Current Approach

Funding for the stormwater activity comes from four sources as follows:

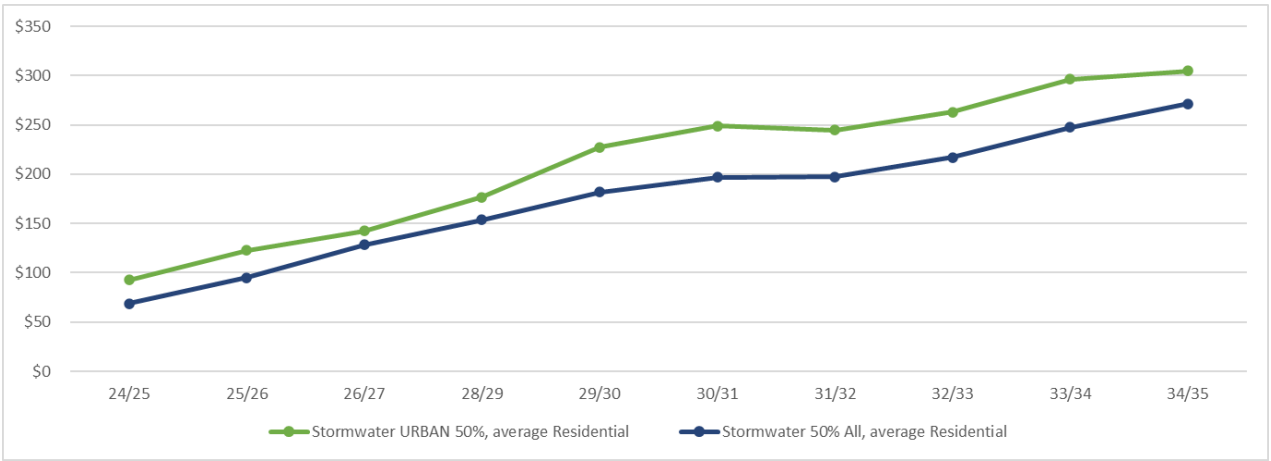
- *General rates* – 50% of the rates requirement comes from general rates.
- *Targeted Rates* - 50% of the rates requirement comes from a targeted rate that only applies to properties in urban areas. This is 0.01206c (excl GST) per dollar of rateable capital value.
- *Development Contributions* - The Council charges a development contribution per Household Equivalent Unit (HUE). There are three components to the charge, a district wide component, an urban component that only applies if the development is within an urban area, and component that only applies to properties within the Waitara or Inglewood Catchments.
- *One-off fees and charges* – The Council charge a fee for obtaining a new sewer connection and disconnection from the network.

Proposed Approach

There are no changes proposed at this time.

Projected users' charges

The key projected user charges for stormwater are given in the figure below.



The affordability of projected water services charges for communities

In this section, it is expected that councils will comment on:

- *Affordability considerations and constraints, including the community's ability to pay projected water services charges; and*
- *Average water charges per connection as a percentage of median household income.*

The cost of three waters services is expected to start at around 1.6% of median household income and increase to around 2.7% (allowing for 3% inflation on median household income) over 10 yrs as shown in the figure below. This equates to water being unaffordable for 22% of the community increasing to 35% of the community using less than 4% of household income as the measure of affordability.

Funding and financing arrangements

Funding and financing arrangements

Water services financing requirements and sources

NPDC net debt 'in relation to 3Waters Services' is expected to increase from $171M to $322M over the 10 years of the LTP 2024-34.

For the Status Quo model, working capital would be funded in accordance with the Council Treasury management policy, with invoices for revenue & expenses accounted for on an accruals basis.

The Council limits on debt are:

- NPDC debt servicing limit of 10% of planned revenue.
- NPDC interest expense lower than 12.5% of rates.
- NPDC planned debt lower than 135% of total revenue.
- LGFA debt servicing limit of 20% of planned revenue.
- LGFA interest expense lower than 30% of rates.
- LGFA planned debt lower than 280% of total revenue.
- Council does not currently have a specific limit for 3 waters debt. In the absence of this we have used a 500% debt to revenue ratio as a guide for the balance of this document.

The planned borrowings over the 10 years are within external limits (except for debt affordability benchmark which marginally exceeds the NPDC limit in the last three years of the LTP 2024-34, NPDC will review annually).

The Financial strategy adopted in the LTP 2024-34 is for Revenue to fund operations, renewals capex and debt repayments (with Service level capex being funded from borrowing, and Growth capex funded from future Development Contributions).

NPDC manage entity debt and calculate Council Services debt at annual balance date. The tenor, refinancing, interest rate risk and debt repayment are managed in accordance with the Treasury Management guidelines.

https://www.npdc.govt.nz/council/strategies-plans-and-policies/policies/treasury-management-policy/

Internal borrowing arrangements
NPDC manage entity borrowing, at annual balance date the debt balance is calculated per Council Service, with interest and repayment costs. There is no change to the internal borrowing approach up to and beyond 30 June 2028. NPDC approach of calculating Council Service debt achieves the ringfencing requirement for annual funding.
Determination of debt attributed to water services
NPDC calculates debt for Council services (from the underlying projects) and maintains a list of required annual repayments per activity. The total value of stormwater services borrowings plus overdrawn reserves as of the 30th June 2024 was $20M and the net debt to operating revenue ratio was 448%.
Insurance arrangements
NPDC is a contributing member of the Local Authorities Protection Programme (LAPP) for Three Water underground assets. Being a member of the Local Authority Protection Programme (LAPP) mutual fund provides cover for losses of (generally underground) structures in the water, wastewater, stormwater and flood protection networks as a consequence of a natural disaster. Cover for the LAPP membership is for two events of up to an amount of $300m for each event. The claim threshold of $1m is the amount of damage which must be reached before a member can make a LAPP claim and includes a deductible amount of $400k NPDC must pay towards a claim for their 40% share once the threshold has been reached. The future of this programme is unclear with the current legislation. NPDC would need to seek new insurance protection should the LAPP wind up as a result of Local Water Done Well – this is TBC. The National Seismic Hazard modelling (Oct 2022) required a reset of the LAPP Probable Maximum Loss cover limit that has been considered and priced into our insurance work programme. Ongoing risk evaluation and loss modelling assessment impacting water services assets are undertaken for LAPP on an ongoing basis. Insurance Management Policy for water services: Insurance review policy and asset identification standards – NPDC has an Insurance Framework that is reviewed every 3 years. As part of improving its asset management practice generally the Council is gradually improving the quality of its asset information to facilitate more effective management of its assets. This means that we are now better placed to complete the modelling needed to calculate the Probable Maximum Loss that will likely need to be covered (through a mix of insurance (external and self), and borrowing) potentially as a prerequisite for any central government assistance in the event of a natural disaster. Aside from improving decisions around asset maintenance, renewal, upgrade or replacement, higher quality information will lead to a better understanding of how resilient our assets might be during a significant natural event. This will, in turn, help our insurers to define their risk profile in this region and increase their comfort level about the accuracy of that profile. Key insurable risks, a description of risk appetite/tolerance and identified mitigations – NPDC insures $1.69b of water assets via the LAPP cover, with $2.77b of assets and values protected representation optimized replacement costs. Self-Insurance Fund - Council maintains a Disaster Recovery Reserve as a 'self-insurance' fund that is available to be called on when uninsured losses are suffered. The reserve seeks to smooth the impact on the community when the Council incurs significantly increased operating costs in recovering from a disaster. There is currently $2.6m in the fund, increasing to $12.3m by 2034. Delegations and reporting on insurance - The framework is to be reviewed at least every three years to ensure that it remains fit for purpose in the context of changes in markets, Council assets and activities, and the operating environment generally. After each review, the revised framework is provided to the Finance, Audit and Risk Committee for approval. An annual report is provided to the Finance, Audit and Risk Committee that details the arrangements made in accordance with this framework and any environmental changes that could impact on those arrangements and the level of confidence that they remain appropriate. This report is provided as soon as reasonably possible following renewal of the insurance programme in June/July each year.

Part D: Financial sustainability assessment

Confirmation of financially sustainable delivery of water services

Financially sustainable water services provision

Confirmation of financially sustainable delivery of water services by 30 June 2028

NPDC can confirm that it is currently financially sustainable. Confirmation of financial sustainability includes confirmation that:

- NPDC has sufficient revenue, including servicing of debt, to deliver water services required in the 30yr capital program.
- The 30yr capital programme includes sufficient investment to meet levels of service, regulatory requirements and provide for growth.
- NPDC has appropriate funding and financing arrangements to fund the 30 yr capital programme with additional headroom for unknown investments.

Details and evidence of financial sustainability are included in the remaining sections of Part D

Actions required to achieve financially sustainable delivery of water services

Council is currently achieving financial sustainability. As demonstrated in the graphs below, NPDC will remain well below the legislated net debt to revenue limit and LGFA borrowing covenants

Risks and constraints to achieving financially sustainable delivery of water services

Risk: CAPEX programme is materially different from projection

Mitigation: Programme will be revised quarterly, and debt, interest and affordability projections will be updated accordingly. NPDC has significant headroom before reaching LGFA borrowing covenants to allow taking on additional debt if required.

Risk: Real inflation is higher than projected.

Mitigation: Programme will be revised quarterly, taking into account external factors. NPDC has significant headroom between LGFA debt to revenue limits and DIA financial prudence indicators to allow taking on additional debt if required

Risk: Legislation, particularly in relation to infrastructure standards, is yet to be confirmed.

Mitigation: Legislation is not expected to significantly differ from current approach as in most cases NPDC is consistent with, or ahead of, national best practice.

Risk: Natural disaster could put fiscal pressure on NPDC.

Mitigation: Councils PIF provides liquid capital should Council need it.

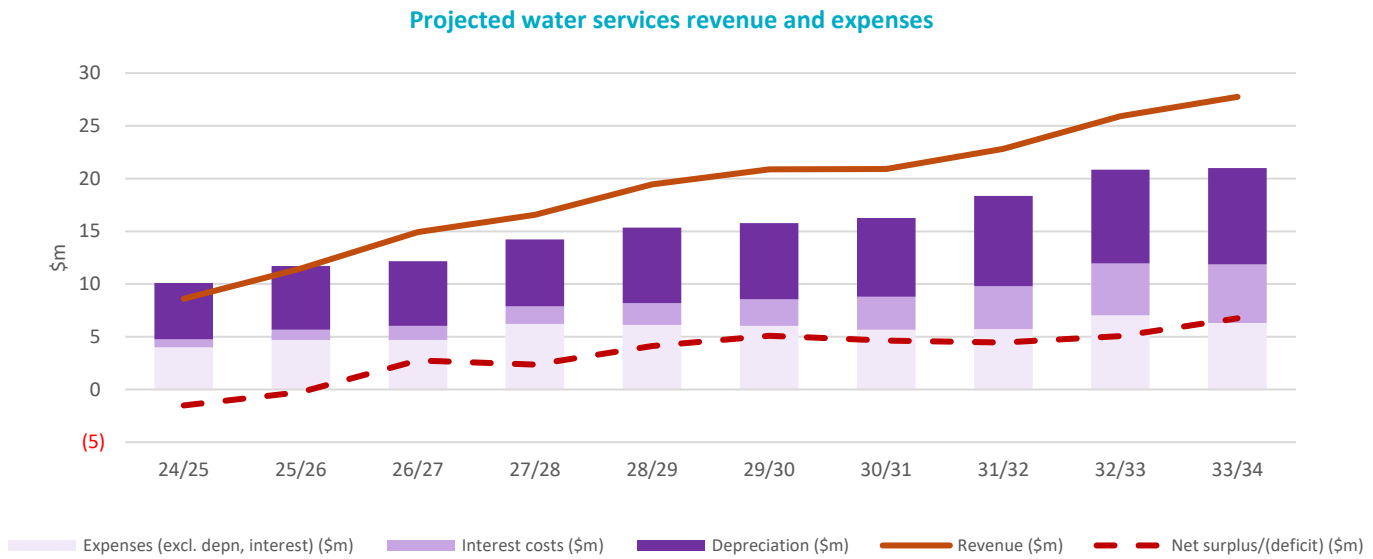
There are no foreseeable constraints on achieving financially sustainable delivery of water services as this is occurring already.

Financially sustainable assessment - revenue sufficiency

Assessment of revenue sufficiency

Projected water services revenues cover the projected costs of delivering water services

The projected water services revenue exceeds expenses in all years, with the surplus being used to fund debt repayments.



Average projected charges for water services over FY2024/25 to FY2033/34

Median household income for 2023/24 is $89,000 and inflated at 3%.

Projected average charge per connection / rating unit (including GST)	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Drinking water										
Wastewater										
Stormwater	161	218	271	330	409	445	442	480	544	576
Average charge per connection / rating unit	161	218	271	330	409	445	442	480	544	576
Increase in average charge	9.9%	35.0%	24.2%	22.0%	23.9%	8.8%	-0.7%	8.6%	13.3%	6.0%
Water services charges as % of median household income	0.18%	0.24%	0.29%	0.34%	0.41%	0.43%	0.42%	0.44%	0.48%	0.50%

Projected operating surpluses/(deficits) for water services

Operating surplus ratio (whether revenues cover costs)	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Operating surplus/(deficit) excluding capital revenues – combined water services	(2,730)	(2,490)	(490)	80	2,340	3,580	3,160	2,970	3,540	5,220
Operating revenue – combined water services	7,380	9,220	11,690	14,300	17,680	19,370	19,430	21,320	24,390	26,220
Operating surplus ratio	(37.0%)	(27.0%)	(4.2%)	0.6%	13.2%	18.5%	16.3%	13.9%	14.5%	19.9%

The NPDC status quo stormwater model has an 'operating surplus ratio' for the first 3 years that is in deficit.

The NPDC target is to fully fund renewal capital expenditure on a 10 year average basis, our Asset Management Plan developed with the LTP includes a ramping up of Capital expenditure to replace existing assets, these renewals will be partially debt funded for the first few years of the LTP, with the overdrawn reserves being repaid and topped up within the first eight years of the LTP.

Any future surplus that is determined as unnecessary is available to allow a lower rates increase (or higher debt repayments). The NZ contracting supplier chain has passed on some hefty inflation increases over the past few years meaning that the accuracy of expenditure estimates 'are simply the best estimate of the future that we have today'.

Projected operating cash surpluses for water services

Operating cash ratio (whether revenues cover costs) $k	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Operating surplus/(deficit) + depreciation + interest costs - capital revenues	3,390	4,530	6,990	8,080	11,560	13,340	13,750	15,580	17,360	19,910
Operating revenue	7,380	9,220	11,690	14,300	17,680	19,370	19,430	21,320	24,390	26,220
Operating cash ratio	45.9%	49.1%	59.8%	56.5%	65.4%	68.9%	70.8%	73.1%	71.2%	75.9%

The NPDC status quo stormwater model has an 'operating cash ratio' that is in surplus across all years. However this is not sufficient in the first three years to meet the Renewals investment required. NPDC chose to keep rates increases affordable meaning these renewals will be debt funded for the first few years of the LTP, with the overdrawn reserves being repaid and topped up within the first eight years of the LTP.

Any future surplus that is determined as unnecessary is available for lower rates increase (or higher debt repayments). The NZ contracting supplier chain has passed on some hefty inflation increases over the past few years meaning that the accuracy of expenditure estimates 'are simply the best estimate of the future that we have today'.

Financially sustainable assessment - investment sufficiency

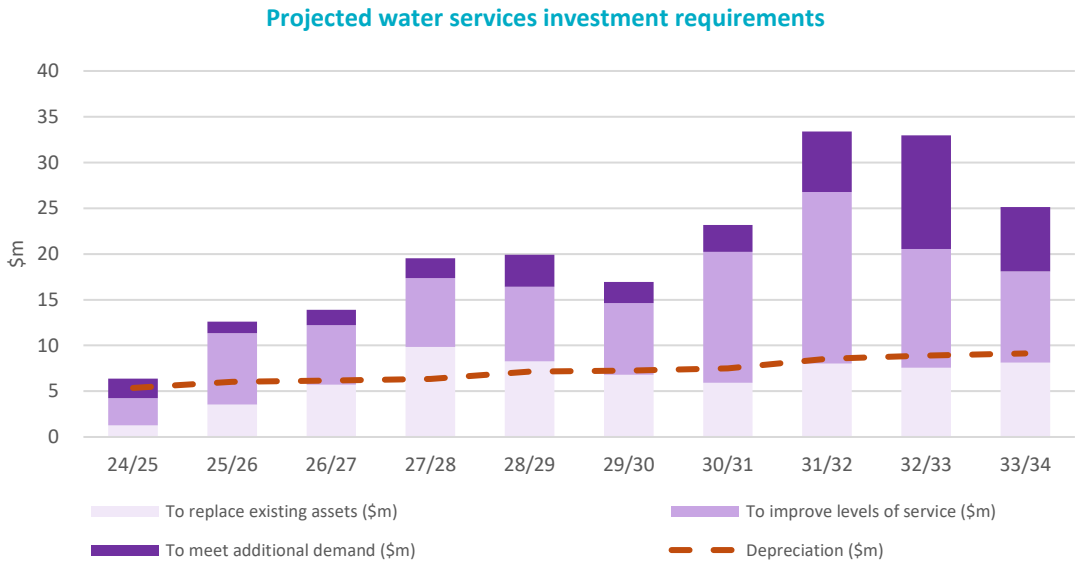
Assessment of investment sufficiency

Projected water services investment is sufficient to meet levels of service, regulatory requirements and provide for growth

NPDC Asset Management Plan to support the LTP meets all levels of service, regulatory and district growth requirements.

NPDC has sufficient debt headroom to finance the required investments.

The investment sufficiency test has been met by NPDC.



Renewals requirements for water services

Asset sustainability ratio $k	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Capital expenditure on renewals	1,260	3,530	5,710	9,830	8,260	6,780	5,940	8,020	7,580	8,120
Depreciation	5,360	6,030	6,160	6,340	7,140	7,240	7,480	8,550	8,890	9,130
Asset sustainability ratio	(76.5%)	(41.5%)	(7.3%)	55.0%	15.7%	(6.4%)	(20.6%)	(6.2%)	(14.7%)	(11.1%)

- *See section 5.3 Renewal Plan of the Three Waters AMPs for details on the forecast renewals spend and supporting information.*

The NPDC Asset Management Plans identifies assets in poor condition that require replacement. NPDC LTP Infrastructure Strategy acknowledges a backlog of renewals delivery. The first two years are due to the ramping up of the renewals program to get on top of the backlog. The next 4 years reflect the increased investment to address the backlog. The Asset Sustainability Ratio is negative over the first three years as the local contractors continue to 'resource up' to deliver a step-increase of activity, the ratio then becomes positive. From 2029/30 onwards the ratio becomes negative, however there is sufficient surpluses to deliver investment if required. The ratio becomes negative due to a reduction in renewals capital in 2029/30 as the augmentation of the stormwater network in Estate Grove renewal project is completed coinciding with the asset revaluation in 2031/32 causing a step increase in depreciation. NPDC Renewals Capital expenditure is adjusted for inflated annually, whereas the Asset revaluation is completed triennially, which has the effect of a step increase to depreciation in years 2025/26, 2028/29 and 2031/32.

Total water services investment required over 10 years

Asset investment ratio $K	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Total capital expenditure	6,390	12,590	13,900	19,540	19,900	16,950	23,160	33,370	32,970	25,120
Depreciation	5,360	6,030	6,160	6,340	7,140	7,240	7,480	8,550	8,890	9,130
Asset investment ratio	19.2%	108.8%	125.6%	208.2%	178.7%	134.1%	209.6%	290.3%	270.9%	175.1%

The planning process for stormwater is still relatively immature and many of the investments required are speculative. However, these stormwater investments are also discretionary in that the driver is to assess flooding issues and improve environmental outcomes that will take generations to address due to the level of investment required.

The Asset investment ratio over the 10 period is positive and unchanged from the infrastructure strategy, LTP and asset management plans.

Average remaining useful life of network assets

Asset consumption ratio	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Book value of water infrastructure assets	307,110	320,426	335,857	356,781	377,390	395,026	418,606	451,798	484,462	509,657
Replacement value of water infrastructure assets	546,154	570,760	598,358	631,660	665,457	696,381	733,469	781,508	829,327	870,204
Asset consumption ratio	56.2%	56.1%	56.1%	56.5%	56.7%	56.7%	57.1%	57.8%	58.4%	58.6%

- *See section 5.3 Renewal Plan of the Three Waters AMPs for details on remaining useful life of assets, renewals backlog and forecast expenditure.*

The Asset consumption ratio holds steady at around 57% over the 10 years.

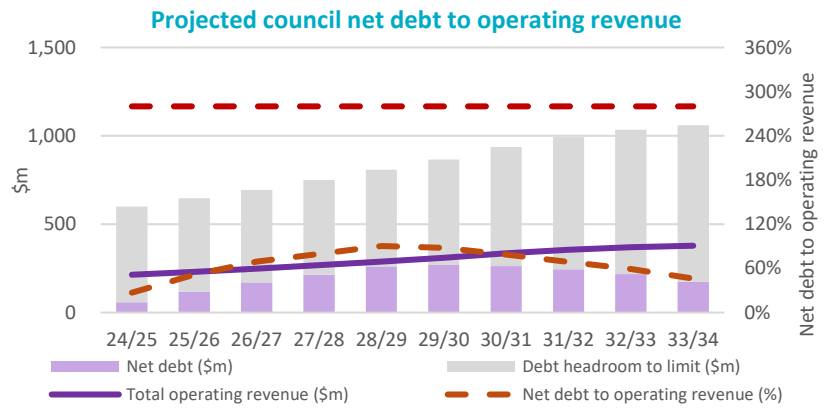
NPDC records remaining life and could calculate a weighted average remaining life.

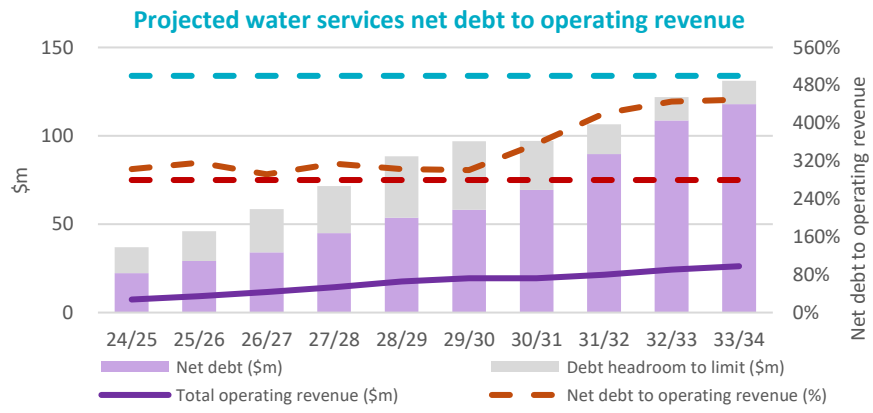
Financially sustainable assessment - financing sufficiency

Assessment of financing sufficiency

Confirmation that sufficient funding and financing can be secured to deliver water services

Projected council borrowings against borrowing limits	**Projected water services borrowings against borrowing limits**





Projected borrowings for water services

Net debt to operating revenue $k	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Net debt attributed to stormwater (gross debt less cash)	22,355	29,165	34,145	44,985	53,625	58,255	69,305	89,655	108,665	117,905
Operating revenue – stormwater	7,380	9,220	11,690	14,300	17,680	19,370	19,430	21,320	24,390	26,220
Net debt to operating revenue %	303%	316%	292%	315%	303%	301%	357%	421%	446%	450%

NPDC drawdown debt to fund day-to-day cashflow requirements, for further detail refer to the Treasury Management Policy.

NPDC net debt to operating revenue is within the proposed Water Services borrowing limit.

Borrowing headroom/(shortfall) for water services

Borrowing headroom/(shortfall) against limit $k	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Operating revenue	7,380	9,220	11,690	14,300	17,680	19,370	19,430	21,320	24,390	26,220
Debt to revenue limit for water services (%)	500%	500%	500%	500%	500%	500%	500%	500%	500%	500%
Maximum allowable net debt at borrowing limit	36,900	46,100	58,450	71,500	88,400	96,850	97,150	106,600	121,950	131,100
Projected net debt attributed to water services	22,355	29,165	34,145	44,985	53,625	58,255	69,305	89,655	108,665	117,905
Borrowing headroom/(shortfall) against limit	14,545	16,935	24,305	26,515	34,775	38,595	27,845	16,945	13,285	13,195

NPDC has a positive projected borrowing headroom across all years.

NPDC will need to create a Net debt to revenue limit for Water Services.

Free funds from operations

Free funds from operations	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Projected net debt attributed to water services	22,355	29,165	34,145	44,985	53,625	58,255	69,305	89,655	108,665	117,905
Projected free funds from operations – water services	2,630	3,540	5,670	6,420	9,480	10,820	10,640	11,520	12,430	14,350
Free funds from operations to net debt ratio	11.8%	12.1%	16.6%	14.3%	17.7%	18.6%	15.4%	12.8%	11.4%	12.2%

The NPDC FFO ratio increases over time, this is in line with the NPDC Financial Strategy to increase Rates income to fund Renewals Capital expenditure.

Part E: Projected financial statements for water services

Projected statement of cashflows

Projected statement of cashflows - water services	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Cashflows from operating activities										
Cash surplus/(deficit) from operations	3,850	5,780	8,920	8,700	11,260	12,320	12,110	13,020	13,960	15,880
[Other items]	0	0	0	0	0	0	0	0	0	0
Net cashflows from operating activities	3,850	5,780	8,920	8,700	11,260	12,320	12,110	13,020	13,960	15,880
Cashflows from investing activities										
Capital expenditure – infrastructure assets	(6,390)	(12,590)	(13,900)	(19,540)	(19,900)	(16,950)	(23,160)	(33,370)	(32,970)	(25,120)
[Other items]	0	0	0	0	0	0	0	0	0	0
Net cashflows from investing activities	(6,390)	(12,590)	(13,900)	(19,540)	(19,900)	(16,950)	(23,160)	(33,370)	(32,970)	(25,120)
Cashflows from financing activities										
New borrowings	3,550	6,390	4,320	6,640	8,890	7,490	14,350	22,130	21,690	12,950
Repayment of borrowings	0	0	0	0	0	0	0	0	0	0
Net cashflows from financing activities	3,550	6,390	4,320	6,640	8,890	7,490	14,350	22,130	21,690	12,950
Net increase/(decrease) in cash and cash equivalents	1,010	(420)	(660)	(4,200)	250	2,860	3,300	1,780	2,680	3,710
Cash and cash equivalents at beginning of year	(3,983)	(2,973)	(3,393)	(4,053)	(8,253)	(8,003)	(5,143)	(1,843)	(63)	2,617
Cash and cash equivalents at end of year	(2,973)	(3,393)	(4,053)	(8,253)	(8,003)	(5,143)	(1,843)	(63)	2,617	6,327

Projected statement of financial position

Projected statement of financial position	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Assets										
Cash and cash equivalents	(2,973)	(3,393)	(4,053)	(8,253)	(8,003)	(5,143)	(1,843)	(63)	2,617	6,327
Other current assets	0	0	0	0	0	0	0	0	0	0
Infrastructure assets	307,110	320,426	335,857	356,781	377,390	395,026	418,606	451,798	484,462	509,657
Other non-current assets	0	0	0	0	0	0	0	0	0	0
Total assets	304,137	317,033	331,804	348,528	369,387	389,883	416,763	451,735	487,079	515,984
Liabilities										
Borrowings – current portion	0	0	0	0	0	0	0	0	0	0
Other current liabilities	0	0	0	0	0	0	0	0	0	0
Borrowings – non-current portion	19,382	25,772	30,092	36,732	45,622	53,112	67,462	89,592	111,282	124,232
Other non-current liabilities	0	0	0	0	0	0	0	0	0	0
Total liabilities	19,382	25,772	30,092	36,732	45,622	53,112	67,462	89,592	111,282	124,232
Net assets	284,755	291,261	301,712	311,796	323,765	336,771	349,301	362,143	375,797	391,752
Equity										
Revaluation reserves	316,953	323,710	331,400	339,125	346,974	354,899	362,800	371,172	379,756	388,961
Other reserves	(32,198)	(32,448)	(29,688)	(27,328)	(23,208)	(18,128)	(13,498)	(9,028)	(3,958)	2,792
Total equity	284,755	291,261	301,712	311,796	323,765	336,771	349,301	362,143	375,797	391,752

Water Services Delivery Plan: additional information

Significant capital projects

Significant capital projects

Significant capital projects – stormwater

Significant capital projects – stormwater ($K)	FY2024/25	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	FY2030/31	FY2031/32	FY2032/33	FY2033/34
Projects to meet additional demand										
Waitara Stormwater Upgrades	60.3	180.4	160.2	59.9	-	-	-	-	-	-
Stormwater Services For Subdivisions In Unservi	159.7	163.2	167.1	170.9	174.7	178.4	182.1	185.8	189.5	193.1
Stormwater Vision and Roadmap and CMP PROGRAMME	-	-	-	-	929.8	949.3	969.3	988.7	1,008.5	-
Patterson Road Culvert Replacement	871.4	-	-	-	-	-	-	-	-	-
Stormwater Network Modelling - Project	1,016.1	868.4	889.3	909.7	-	-	-	-	-	-
Mangaone Flood Management - Concept and Land Purchase	-	-	-	-	1,127.1	-	-	-	-	-
Mangaone Flood Management – Implementation	-	-	-	-	-	-	-	-	6,112.5	-
Puketapu Area Stormwater - Phase 1	40.2	41.1	259.3	365.6	586.1	478.7	1,069.3	950.4	238.4	-
Inglewood Stormwater Remedial - PROGRAMME	-	-	215.6	661.7	676.3	690.5	705.0	1,198.5	1,222.5	1,245.7
Puketapu Area Stormwater - Phase 2	-	-	-	-	-	-	-	3,271.9	3,667.5	5,605.7
Total investment to meet additional demand ($K)	2,147.6	1,253.0	1,691.4	2,167.9	3,493.9	2,296.9	2,925.7	6,595.2	12,438.8	7,044.4
Projects to improve levels of services										
Waitara Stormwater Upgrades	1,447.0	4,328.6	3,843.9	1,438.7	-	-	-	-	-	-
Stormwater Vision and Roadmap and CMP PROGRAMME	-	-	-	-	232.4	237.3	242.3	247.2	252.1	-
Stormwater Reticulation Minor Augmentations	154.5	157.9	161.7	165.4	169.1	172.6	176.3	179.8	183.4	186.9

Patterson Road Culvert Replacement	55.6	-	-	-	-	-	-	-	-	-
Stormwater Network Modelling - Project	254.0	217.1	222.3	227.4	-	-	-	-	-	-
Patterson Rd stormwater catchment	618.0	2,105.4	-	-	-	-	-	-	-	-
Stormwater Treatment Retrofits PROGRAMME	-	-	-	-	338.1	345.2	352.5	359.6	366.8	373.7
Stormwater Catchment Management Planning	-	-	-	1,470.4	1,502.8	1,534.4	-	-	-	-
Tangaroa Restoration - Section 7 Pennington Park	160.0	-	-	-	-	-	-	-	-	-
Mangaotuku Diversion Tunnel Optimisation	-	-	-	-	-	-	-	479.4	4,890.0	-
Remedial Works from CMP	-	-	-	-	-	-	-	2,397.0	2,445.0	2,491.4
Puketapu Area Stormwater - Phase 1	268.8	274.8	1,735.0	2,446.6	3,922.3	3,203.8	7,155.8	6,360.4	1,595.4	-
Tangaroa Restoration - Section 8 Marsh	160.0	-	-	-	-	-	-	-	-	-
Inglewood Stormwater Remedial - PROGRAMME	-	-	539.0	1,654.2	1,690.7	1,726.2	1,762.5	2,996.3	3,056.3	3,114.3
Dams Safety Regulations Compliance - PROGRAMME	179.2	732.7	-	143.9	294.2	650.8	4,600.1	5,734.8	159.5	3,793.2
Total investment to meet improve levels of services ($K)	3,297.2	7,816.5	6,502.0	7,546.6	8,149.6	7,870.4	14,289.4	18,754.4	12,948.4	9,959.4
Projects to replace existing assets										
Resource Consent Renewals Stormwater	24.7	530.6	230.7	687.0	-	-	-	353.6	619.8	264.1
Stormwater Reticulation Renewals Budget	1,030.0	2,697.0	2,809.3	4,447.0	6,434.0	5,440.4	3,980.3	4,794.0	4,890.0	4,982.8
Augmentation of Stormwater network in Estate Grove	-	-	2,156.0	3,308.4	563.6	-	-	-	-	-
Inglewood Stormwater Remedial - PROGRAMME	-	-	323.4	992.5	1,014.4	1,035.7	1,057.5	1,797.8	1,833.8	1,868.6
Monitoring equipment at Detention Dams	133.9	136.9	140.1	297.8	146.5	149.6	152.8	155.8	158.9	336.3
Flood Control Planned P&E Renewals	51.5	52.6	53.9	82.7	56.4	57.5	58.8	59.9	61.1	93.4
Dams Safety Regulations Compliance - PROGRAMME	26.8	109.5	-	21.5	44.0	97.2	687.4	856.9	23.8	566.8

Total investment to replace existing assets	1,266.9	3,526.5	5,713.4	9,836.9	8,258.8	6,780.5	5,936.7	8,018.0	7,587.4	8,112.0
Total investment in stormwater assets	6,711.7	12,596.0	13,906.8	19,551.4	19,902.3	16,947.8	23,151.8	33,367.6	32,974.7	25,115.8

Risks and assumptions

Disclosure of risks and material assumptions for water services delivery

Parameters	Stormwater
Key Risks • Future water service delivery • Network performance • Regulatory compliance • Delivery of Capital Programme • Organisational capacity • Long term issues e.g. providing for growth, climate change	See Stormwater and Flood Protection AMP section 6.2 • Lack of understanding of the stormwater network, flood risk and stream health • Key infrastructure asset failure due to inadequate preventative maintenance/renewal • Failure to meet level of service or level of protection leading to flooding, asset damage and community impact • Stormwater inflow to the wastewater network resulting in overflows • Insufficient planning for growth • Delays and increased cost due to lack of systems, processes and competence for increased engagement with Tangata whenua • Unrecorded assets will not be appropriately managed • *Insufficient training and checks and balances in place – breach of RMA provisions* • Dam safety and compliance risks
Significant assumptions • Future water service delivery • Network performance • Regulatory compliance • Delivery of Capital Programme • Organisational capacity	• Growth projection • Ability to adapt to changing legislation without significant funding or process changes • Accuracy of modelling • Climate change

• Long term issues e.g. providing for growth, climate change	

Appendix A

STORMWATER CONSENTS – not including land use consents per guidance on p. 24

Expiring in the next 10 years

Resource Consent Reference Number	Type of Resource Consent	Expiry Date for Resource Consent	Status	Non-Compliance	Compliance Actions (last 24 mos.)	Comments
5163-2 (SW from Waiwhakaiho industry to Mangaone Stream)	Discharge to water	1-Jun-26	Active			
4901-2 (Discharge Stormwater to left bank of Waitara River Estuary)	Coastal permit	1-Jun-26	Active			
1275-3 (discharge from industry into Mangaone Stream via outfalls)	Discharge to water	1-Jun-26	Active			
5331-2 (SW discharge to Te Henui)	Discharge to water	1-Jun-32	Active			
5619-2 (SW discharge to Waionganaiti)	Discharge to water	1-Jun-32	Active			
05493-2 (SW discharge to Waitara River)	Discharge to water	1-Jun-33	Active			
5125-2 (SW discharge to Herekawe Stream)	Discharge to water	1-Jun-32	Active			
05068-2 (Discharge Stormwater into tributary of Waiongana stream)	Discharge to water	1-Jun-32	Active			

0609-3 (SW discharge from Waitaha industry to Waitaha Stream)	Discharge to water	1-Jun-32	Active			
11088-1.0 (Mangamahoe LHD removal)	Discharge to water	1-Jun-28	Active			No renewal necessary, dam has been removed
04302-2 Stormwater from industrial area Bell Block	Discharge to water	1-Jun-20	Operating under s124 RMA			
6095-1 (East End SW discharge)	Discharge to water	1-Jun-21	Operating under s124 RMA			
5161-2 (SW discharge)	Coastal permit	1-Jun-32	Active			
05183-2.0 (SW discharge Ngamotu Beach)	Coastal permit	1-Jun-32	Active			