



**Submission:** Christchurch City Council Long Term Plan 2018-28

**From:** Friends of Banks Peninsula

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**We wish to be heard in support of our submission.**

## Introduction

Friends of Banks Peninsula is a community based environmental group, operating since 1990, and involved with many planning and environmental issues, particularly in the Akaroa area. Our submission addresses three topics:

- Akaroa Wastewater Treatment and Disposal
- Rural Public Toilets on Banks Peninsula
- Freedom Camping

We do not support the Council's position on wastewater in its Long Term Plan. Network overflows in wet weather and sewage in the environment are not acceptable. Proper sewage treatment is not an issue to be put at a lower priority level than other demands on Council. It is important that the Council find ways to design and fund sound management of sewage systems, including public education and incentives to reduce wastewater volumes and harmful chemical contaminants.

## 1 Akaroa Wastewater Treatment and Disposal

Friends of Banks Peninsula has been involved with the Akaroa Wastewater issue for many years. We recognise that the treatment and disposal of wastewater is a complex problem with no easy answers. Our lengthy and detailed submission to the Akaroa Wastewater consultation in May 2017 advocating for 100% non-potable re-use in Akaroa demonstrated our commitment to assisting with finding solutions. It was supported by 300 people.

In this submission to the Long Term Plan 2018-28, we ask the Council to **revisit the budget** it has set for the Akaroa Wastewater Treatment Plant and Disposal.

The budget of \$35 million does not appear to be substantially different from that given in the previous Long Term Plan issued in 2015, but the requirements on the proposed system have gone up markedly. The 2015 budget was based on a harbour outfall to dispose of the treated wastewater, but consent for this was declined by ECAN, and an exhaustive search is in progress for an alternative disposal method, with all options presented to date being more expensive. Furthermore, during the process of investigating 100% non-potable re-use it emerged that the **volume of wastewater is double that designed for in 2015**. The

treatment plant itself must be larger to cope, additional land is needed to store incoming flows during wet weather, and additional work is needed to reduce ground and storm water infiltration. 100% non-potable re-use in Akaroa is also no longer feasible.

If the budget is left at the 2015 level, we are extremely concerned that when the new Treatment system is finally built it will require cost-cutting to the design to meet an out of date budget. This is likely to lead to a lower treatment standard, increased frequency of network overflows and potentially lower environmental and public safety outcomes than with the current system.

At \$35 million for around 1000 connections, the proposed system was already extremely expensive per connection. It now seems likely that the real cost per connection will be even greater.

Given the extremely high cost of local treatment and disposal, we suggest that the Council now reviews its overall approach, and **investigates the feasibility of piping the untreated wastewater to the Christchurch city system** for treatment and disposal, thus **avoiding the high cost of a treatment plant in Akaroa**. Such a pipe would pass through the communities of Takamatua, Duvauchelle, Cooptown, Little River and Birdlings Flat. All of these communities need reticulated wastewater service renewals or new installations. A single pipe to Christchurch **may be less expensive than several separate treatment plants** and disposal fields, each with associated operating costs. The Council has taken a similar approach for Diamond Harbour, Governors Bay and Lyttelton.

## 2 Public toilets

We are concerned about the poor provision of rural public toilets on Banks Peninsula and serious oversights in their management. Despite being a tourism area with high visitor levels, the area has very few public toilets. Human waste and toilet paper on roadsides, parks and private property is increasingly widespread. Where upgrades have been done by Christchurch City Council, it has been to the superstructure only and not to the disposal systems underneath. This led to the disastrous situation in French Farm where a new toilet block and campervan waste dump were built on an old septic tank and disposal system with the capacity to handle only 234 litres, or about 39 flushes per day (*Wainui and French Farm – Existing On-site Wastewater System Assessment Report – Beca August 2016*). Serious damage to the disposal system was not detected by the Council. This area then became popular with freedom campers because of the waste dump, and was later actually designated a freedom camping area until the failing toilet system was closed down.

A further report (*Banks Peninsula Public Toilets Assessment Report – Beca, June 2017*) revealed that a new superstructure had been put onto an old and inadequate system in Le Bons Bay, and that most of the other public toilets were served by holding tanks or septic tanks with limited capacity and were unlikely to be meeting current demand. It recommended that septic systems should not be emptied more frequently than once every three years, or they would not function adequately. The report found that the Council did not have any information about the level of use, or the volume of wastewater produced at any of the toilets, and recommended that the Council undertake flow monitoring and/or estimate user numbers.

We request that the Council includes specific provisions and funding in its LTP to :

- **Monitor the use of existing rural public toilets.**
- **Upgrade onsite waste treatment systems to ensure environmental and public safety.**
- **Investigate unmet demand and identify locations for new public toilets.**

### 3 Freedom Camping

We are concerned that the current levels of freedom camping are exacerbating the demands on these failing systems. Many 'self-contained' campers prefer not to use their on-board facilities, and, in any case, still require waste dumping facilities. We are aware that the government recently made some funding available for Councils struggling with the impacts of freedom camping and increased visitor numbers for the provision of infrastructure such as public toilets and waste dumps, but that this was not available for Christchurch City.

We ask that the **Council provides funding for effective monitoring of freedom camping** and also to continue to **explore ways in which funding can be sourced** (eg. levy on campervan rentals, levy on Self-contained registration) **to provide the necessary infrastructure** for this activity. . .

We request the provision of adequate funding to investigate and monitor freedom camping issues on Banks Peninsula, and a full review of the Freedom Camping By-law prior to the 2018/2019 summer season.