

**SUBMISSION TO THE STORM RECOVERY  
AND RESILIENCE CONSULTATION  
11 SEPTEMBER 2023**

Rosebank Business Association  
Phil Clode - GM Business Development  
Phone: 027 4487009 or 09 820 0551  
Email: [phil@rosebankbusiness.co.nz](mailto:phil@rosebankbusiness.co.nz)

Stronger together

[www.rosebankbusiness.co.nz](http://www.rosebankbusiness.co.nz)

18 Jomac Place, Rosebank, Auckland 1026  
PO Box 151190, New Lynn, 0640, Auckland, Phone: 820 0551



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Storm Recovery  
Auckland Council  
Private Bag 92300  
Auckland 1142

[stormrecoveryconsultation@aucklandcouncil.govt.nz](mailto:stormrecoveryconsultation@aucklandcouncil.govt.nz)

## **SUBMISSION TO THE STORM RECOVERY AND RESILIENCE CONSULTATION**

The Rosebank Business Association ('Association') welcomes the opportunity to provide this feedback to the Auckland Council Storm Recovery and Resilience Consultation ('Consultation Document'). [Link](#)

The Rosebank Business Improvement District is a commercial and industrial hub of 650 + businesses located on the Rosebank Peninsula in West Auckland. It has direct access to the SH16 North-Western Motorway and when the Waterview tunnel was completed, it's traffic count increased to between 25 and 35,000 vehicles per day with the immediate access and link to the SH20 Airport Motorway. Businesses in the area generate an estimated \$1 billion in revenue, pay significant rates and employ about 9,000 FTEs. The predictions are that this workforce will increase to 20,000 by 2035.

### **Introduction**

As your Consultation Document notes, in early 2023, the Tāmaki Makaurau / Auckland region experienced a series of extreme weather events, with record-breaking rainfall, floods, landslides and high winds. Tragically, six people lost their lives. Thousands of people have been affected, and homes, businesses, and communities have suffered long-term impacts. Auckland Council is committed to supporting communities recover and prepare for the future.

To address these events, Auckland Council formed the Recovery Office and created an interim recovery plan.

Auckland Council are now developing the Tāmaki Makaurau Recovery Plan and a series of stormwater improvements called 'Making Space for Water' to focus on the longer-term recovery. Auckland Council is seeking feedback on these plans.

The proposed Tāmaki Makaurau Recovery Plan will outline priorities for region-wide and local recovery activities. This plan is a legal requirement to address the repair, regeneration and resilience of the Auckland region.

The Council's Healthy Waters department is developing a series of stormwater improvements called 'Making Space for Water' as part of recovery efforts. Healthy Waters is planning nine initiatives to reduce flood risks and make big improvements to Auckland's stormwater network. They propose to deliver the initiatives over six years including: infrastructure improvements, such as culvert and bridge upgrades; increased stormwater maintenance; empowering our communities to prepare for and increase resilience to flooding; creating blue-green (waterways and parks) networks to allow stormwater to safely pass through urban areas.

Auckland Council is looking for feedback to help develop the Tāmaki Makaurau Recovery Plan and refine the 'Making Space for Water' initiatives, including how the storms affected businesses; what is important for recovery; how Council can better prepare for future extreme weather events; and opinions on the ideas proposed in 'Making Space for Water'.

## **Our Detailed Feedback**

We include below more detailed feedback on your specific questions.

### **1. How were you, and your local community, affected by the extreme weather events in early 2023?**

Although our business and commercial property owners in Rosebank were largely unaffected by the extreme weather events in early 2023, we are aware that business and commercial property owners elsewhere were not so fortunate and we are giving our feedback to support their voice and concerns.

### **2. Was your business flooded or damaged during the extreme weather events in early 2023?**

As above.

### **3. In the months following the storms what has helped you and your community get through?**

As above.

### **4. What would help you and your community feel like you had recovered from the extreme weather events?**

First, we have heard from other business associations where their members were badly affected by the extreme weather events in early 2023 that they do not feel like they have 'recovered' from this year's extreme weather events. Some of their businesses that were affected are still not operating again, with others operating under a 'cloud', fearful of when the next extreme weather event will come (exacerbated by climate change).

Although a storm response fund of \$20M was added to the 2023/2024 Annual Budget, as can be seen from the Consultation Document, \$1.65 billion is needed over the next six years. \$20M is a drop in the bucket so we are worried little progress will be made this financial year.

Though we appreciate the response now underway through this consultation, we expect another 9 months until the proposed targeted rate can be set (30 June 2024) and then perhaps another year while contracts are let to do the necessary work. This is simply taking far too long.

### **5. How can Tāmaki Makaurau Auckland be more prepared for events like these in the future?**

We agree with your four key objectives for managing flood risks (ie reduce existing flood risks, avoid creating new flood risks, raise people's awareness of flood risks and be prepared for flood events.)

However, as we will expand on below, Tāmaki Makaurau Auckland needs to prioritise getting the basics right, like street sweeping and street sump cleaning, and for the basics to be treated with priority. We also want to see the existing stormwater/wastewater pipe network flushed regularly to ensure any silt build up is removed and we want these networks expanded so they operate optimally to their maximum capacity. It is also important to undertake 'smarter' approaches to these simple measures, with better contract management, monitoring and oversight of these basic services.

The 'cracks' between the 'silos' that operate within the Auckland Council "family" (eg Auckland Council, Auckland Transport or Watercare) and beyond (eg with Waka Kotahi/NZTA) for stormwater/wastewater management and emergency response also need to be urgently fixed (even for such simple things as who takes complaints about blocked drains and who is then responsible for unblocking them). In this regard, we are very concerned about further 'silos' being created with the Water Services Reform Programme and the responsibilities for important aspects of stormwater management slipping into the cracks between the silos of these new entities, the Auckland Council "family" and Waka Kotahi/NZTA.

**6. There are nine possible initiatives outlined in Making Space for Water (the Consultation Document)**

Operations and maintenance	Increased maintenance
	Flood intelligence
Neighbourhood solutions	Community-led flood resilience
	Stream rehabilitation
	Rural settlements
	Culvert and bridge upgrades
	Blue-green networks
Site specific interventions	Overland flow path management
	High risk properties

**Auckland Council's initial budget suggests it will cost \$1.65 billion to deliver them and will require additional rates from Aucklanders. The Consultation Document asks: "Do you have any comments on the initiatives?"**

**Increased maintenance**

*This involves keeping the stormwater network ready to handle lower-level flooding events. It involves increased street sweeping and catchpit clearing that can help keep the stormwater network flowing and reduce the risk of localised flooding. It's especially important in urban areas where hard surfaces like roads, footpaths and driveways mean there is nowhere else for the water to go.*

We support the initiatives to: (a) undertake more frequent street sweeping, targeting higher risk and heavy leaf-fall areas; (b) more frequent catchpit cleaning (at least three times a year in high risk areas, and twice a year everywhere else; (c) network upgrades, such as building you catchpits with bigger inlets; and (d) targeted public overland flow path management and stream clearance.

We have been very concerned by media reports that plans were underway at Auckland Council to cut spending on stormwater repairs and maintenance shortly before the January floods and that this was the second year in a row that the Healthy Waters division had come up with cuts to stormwater maintenance and repairs as part of budget savings. [Link](#) Blocked drains and reduced cleaning of stormwater pipes contributed to the flooding.

We understand that the storm response fund includes \$7 million for ongoing maintenance, doubling street sump cleaning frequency, identifying more flooding hotspots as well as inspection and compliance. We also want to see the existing pipe network flushed regularly to ensure any silt build up is removed and we want the network expanded. We must ensure these existing stormwater/wastewater networks operate optimally to their maximum capacity.

However, it is also important to undertake 'smarter' approaches to these simple measures. For example, we have seen extra street sweepers sent to supposedly clean streets only for them to come in the afternoon when the carparks are full and for them to never get anywhere near the curb to actually sweep up leaves. No doubt they have been paid, but they have on these occasions been entirely ineffective. Better contract management, monitoring and oversight of these services is also clearly needed.

We support getting these basics right and them treated with priority.

**Flood intelligence**

*This involves investing in planning and modelling tools to understand flood patterns and assess future risk. Having detailed and robust data will help Auckland Council respond to storm events as they happen and also help provide good advice about flood risk for new developments.*

We support the initiatives to: (a) incorporate data from recent storms into flood maps; (b) enhance hotspot monitoring technology, and explore systems for early warning alerts; (c) share information with the public via a Flood Viewer tool to improve flood hazard awareness.

However, much of this information is already available (such as flood plain maps) and has been for years, but their existence and the risks they highlight do not appear to have been translated into more regular focused maintenance (for example, more frequent street sweeping, leaf fall collection and catchpit cleaning that targets higher risk areas).

### **Community-led flood resilience**

*This involves ensuring Aucklanders know what to do before, during and after a flood, and are active in managing their own risks. The Consultation Document notes that local knowledge is invaluable for flood management and that empowering communities to become the guardians of their stormwater and waterways can help to tackle potential flood risks before they occur. This needs to happen safely, in conjunction with the Councils operations and in a manner that supports environmental best practices. In addition, when flooding does happen, it is crucial for the public to understand the potential dangers, so that they know what to do to prepare, survive, and to recover.*

We support the initiatives to: (a) develop community flood readiness resources, including strategies to manage flood risks at home, and what to do before, during and after a flood; and (b) empower community groups to undertake flood resilience activities, by providing advice, tools and resources (this includes stream and riparian management to restore impacted stream banks).

### **Stream rehabilitation**

*This involves rehabilitating critical high-risk streams so that they will be more resilient to floods. The Consultation Document notes that when streams are healthy, they help to move floodwaters safely away from people and property. Weeds, rubbish and erosion can block streams and leave less space for water.*

We support the initiatives to: (a) undertake rehabilitation works by council on critical streams, including vegetation management, slope stabilisation, bank battering and stream channel modification to improve the flow dynamics of the stream and reduce erosion; and (b) provide advice to owners with streams on their properties.

### **Rural settlements**

*This involves developing flood management solutions for rural communities, marae and papakāinga. The Consultation Document notes that rural settlements have a different flood risk management needs compared to urban areas, especially where rapid growth has changed the flood risk profile for these communities.*

We support the initiatives to: (a) identify the specific flood management needs of rural settlements and helping to implement appropriate solutions; (b) build capability of marae as resilient centres and community hubs (this might include physical works to reduce vulnerability to effects of flooding and extreme weather events); (c) provide advice on managing private rural water systems when floods happen, including bores, rainwater tanks and on-site wastewater systems.

### **Culvert and bridge upgrades**

*This involves improving the capacity and resilience of critical culverts and bridges. This will allow more water to flow through culverts and under bridges and reduce the risk of blockages from debris floating downstream.*

We support the initiative to upgrade the capacity and safety of high-priority culverts and bridges, including expanding the area of inlets and managing downstream effects.

### **Blue-green networks**

*This involves creating new open spaces in areas identified as having critical flood risks, feasible stormwater solutions, and wider community benefits. The Consultation Document notes that blue-green networks provide open spaces for water (blue) to flow through the landscape (green) and in heavy storms rainfall collects in these areas reducing risk to people and property. Blue-green networks also provide benefits to their communities (when we make space for water, we also make space for people and nature, with walking tracks, cycleways, trees and wildlife).*

We support the initiative to develop new blue-green spaces in the areas where there are serious flooding risks (though this will require detailed analysis of the risk and design suitability of candidate sites).

We also note that the Consultation Document says that this could include stream naturalising, widening and realignment, and replanting of surrounding areas. In some situations it may be possible to look at redeveloping adjacent land with housing built to be protected from flooding. It is expected that this initiative will require the removal of some homes in flood-prone areas and would work in-with the central government process underway that is identifying high-risk 'Category 3' houses.

### **Overland flow path management**

*This involves keeping private overland flow path is clear of obstructions. The Consultation Document notes that improving the management of overland flow paths presents the greatest opportunity for flood management in Tāmaki-Makaurau/Auckland. It also notes that overland flow parts need to be kept clear of barriers, like fences, retaining walls, buildings and overgrown vegetation, so that water can move safely through neighbourhoods and that, in most circumstances, it is the responsibility of individual property owners to keep overland flow paths clear, with the actions they take impacting not only their own property but also their neighbours property.*

We support the initiatives to: (a) provide information to homeowners, community groups and industry professionals about how to correctly manage an overland flow path on their property (but add here businesses); (b) provide on site assessment to identify blockages on properties and advise owners of their responsibilities with potential for infringement notices and legal action when necessary; (c) investigate larger scale projects to improve a catchment's overland flow paths, where on-site solutions aren't enough.

The Auckland Council "family" also needs to take responsibility for overland flows on their properties (such as local parks, streets, etc).

### **High-risk properties**

*This involves working with property owners to develop solutions where occupants are exposed to high flood risk. The Consultation Document notes that properties that have been severely affected by flooding are scattered around the region and will need to be dealt with individually. It also notes that in some cases, there may be engineering solutions to mitigate risk from future floods. Where there is no practical or affordable infrastructure solution, the Consultation Document notes that the home may need to be removed and that this process will require careful engagement with property owners and residents, and coordination with central government.*

We support the initiatives underway, as part of the Cyclone Recovery process with central government for Auckland Council to identify higher-risk homes and determine appropriate mitigation options. The Consultation Document notes that this work is part of improving flood risk management, and includes: (a) inspection and engagement (site specific visits to identify high-risk properties and practical solutions to mitigate flooding); (b) flood plain management (identifying potential options for land where houses are removed through a property buyout process (this includes connecting into blue-green networks possible redevelopment where land redevelopment makes housing a safe option).

We ask that these initiatives also include any affected business properties.

### **7. Are there any other activities that you think are important to manage flooding that haven't been included in Making Space for Water?**

We have been particularly concerned about the 'silos' that operate within the Auckland Council "family" that exacerbate the problems of underfunded stormwater/wastewater management and which also makes emergency responses all the more challenging. At times, there does not seem to be a clear answer as to who in the Auckland Council "family" has responsibility for core services, such as taking complaints about blocked drains and then unblocking them (eg Auckland Council, Auckland Transport or Watercare). Aging combined stormwater and wastewater systems exacerbate the problem. To the frustration of some business associations, some "roads/intersections" are the responsibility of Council, while are the responsibility of Auckland Transport or even Waka Kotahi/NZTA – and then there are some that fall into being a kind of "no man's land". Determining clearly who is responsible has to be a priority.

In this regard, we are also very concerned about further 'silos' being created with the Water Services Reform Programme and the responsibilities for important aspects of stormwater management slipping into the cracks between the silos of these entities, the Auckland Council "family" and Waka Kotahi/NZTA.

Another issue that hasn't been mentioned is whether Council's responsibility for poor management has opened it up to claims from affected property owners? For example, for some businesses hit hard by the storm events, insurance claims are in the hundreds of millions of dollars and many now face steep premium and excess increases. Some also have exclusions now placed on being able to insure against future flood damage.

### **Funding the improvements**



*Auckland Council has estimated the total cost of 'Making Space for Water' to be just under \$1.6 billion over six years (made up of around \$700 million for land acquisition, \$500 million of capital investment in improvements to Auckland's networks, and \$400 million of operating expenditure to improve service levels). This includes a large proportion for Blue-Green networks which can only go ahead if high-risk properties are removed. To cover the cost of 'Making Space for Water', Auckland Council has the option to introduce a targeted rate. This could be allocated across the region in the same way general rates are applied or could be tiered so that people pay more if significant investment is made in their local area.*

In principle, we support the introduction of a targeted rate to cover the cost of 'Making Space for Water' and consideration of the options that this could be allocated across the region in the same way general rates are applied or could be tiered so that people pay more if significant investment is made in their local area.

However, as we have stated with regard to the introduction of other targeted rates, fundamentally, we do not accept the view that a business differential should be applied to targeted rates (or general rates) especially for reasons that "businesses are better able to manage additional costs than residential properties" or because "businesses can claim back GST and expense rates against tax." These reasons do not justify the business differential, particularly for small businesses who make up most businesses in Auckland and in light of the main beneficiaries of such a proposed 'Making Space for Water' targeted rate being residential property owners.

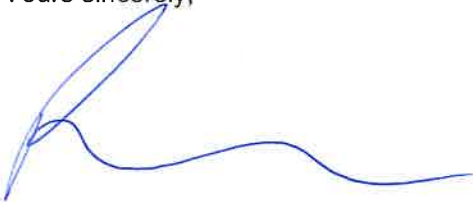
We also ask that the \$700 million for land acquisition, \$500 million of capital investment in improvements to Auckland's networks, and \$400 million of operating expenditure to improve service levels be broken down further for each of the nine activities above and how the funding specifically provides benefits to businesses (or business areas).

## Conclusions

Our Association welcomes the opportunity to make this submission to the Auckland Council Storm Recovery and Resilience Consultation.

We wish to be heard should there be any hearings.

Yours sincerely,



Phil Clode  
GM Business Development

M: 027 4487009

E: [phil@rosebankbusiness.co.nz](mailto:phil@rosebankbusiness.co.nz)

P: 09 820 0551

Rosebank Business Association  
18 Jomac Place, Rosebank, Auckland 1026, NZ  
PO Box 71034, Rosebank, Auckland 1348, NZ  
[www.rosebankbusiness.co.nz](http://www.rosebankbusiness.co.nz)