Te Kaunihera-ā-Rohe o Ngāmotu
New Plymouth District Council

Water Services Delivery Plan

New Plymouth District Council

Inhouse Delivery of Stormwater Services

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 revenue is sufficient to cover the costs of delivering the stormwater service, 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.

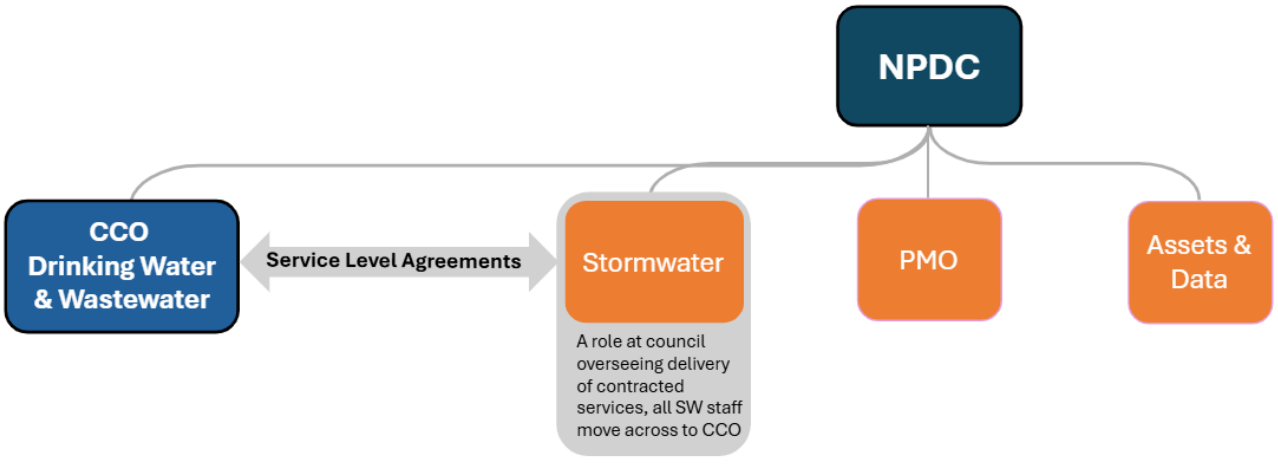
Proposed delivery model

Proposed model to deliver financially sustainable water services

The proposed model to deliver water services

NPDC 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 stormwater services to our community while ensuring there is sufficient capacity to increase investment in infrastructure and meet regulatory requirements. One option under consideration is to explore transitioning all stormwater activities currently managed under Three Waters to the CCO, potentially supported by a Service Level Agreement (SLA) between NPDC and the NP WSCCO. From a practical perspective, this may offer efficiencies, given the shared use of drainage system maintenance contractors between stormwater and wastewater. It could also support continuity across functions such as planning, growth, renewals, asset management, and project delivery. This approach might help retain staff knowledge and existing plans and could be a cost-effective solution.



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 will enable the following:

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

b) Minimal increased costs/overheads to achieve financial separation

c) 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

NPDC is proposing to continue delivering stormwater services independently by way of an In-House Business Unit. As Stormwater services will continue to be delivered via the existing in-house arrangements (subject to changes resulting from removing Drinking Water and Wastewater activities and assets), limited actions are required under the Implementation Plan, beyond those to effect asset transfer. It is noted that under the existing planning in the LTP, stormwater is already on track to meet financial sustainability by 30 June 2028. No specific implementation action is required to meet this.

Consultation and engagement

Consultation and engagement

Consultation and engagement undertaken

Mana whenua engagement and feedback from the Local Water Done Well consultation have been reflected in NPDC's WSCCO Water Service Delivery Plan.

Community consultation was carried out between 30 April and 30 May 2025, presenting three delivery model options:

1. A Regional/Taranaki Water Services Council-Controlled Organisation (WSCCO)
2. A New Plymouth District Council (NPDC) WSCCO
3. An Enhanced Status Quo (In-House Business Unit)

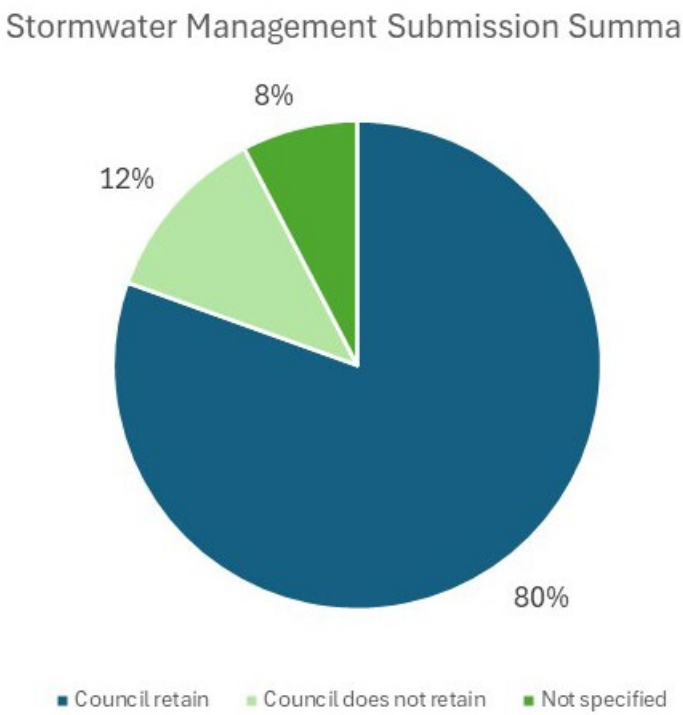
Under both WSCCO options, stormwater services were proposed to remain in-house.

A total of 287 written submissions were received, representing approximately 0.41% of eligible voters. On 1 July 2025, 11 verbal submissions were presented at a hearing session. The results of the consultation were then reported to the full Council, informing the final decision made on 22 July 2025.

Public Consultation on Stormwater

Consultation Question 2. Do you support NPDC retaining in-house control of stormwater services?

For Stormwater Management, the majority of submitters expressed a preference for Council retaining management of stormwater services (80 per cent). Thirty-four (12 per cent) of submitters supported Council not retaining management of these services and a few submissions (8 per cent) did not specify a preference.



Common themes form the comments include:

1. **Governance, Transparency, and Local Control:**
   Respondents strongly favoured keeping stormwater services in-house to maintain transparency, accountability, and local oversight. Concerns included the risks of outsourcing, increased bureaucracy, and reduced public influence over decision-making.
2. **Integration with Other Services and Infrastructure:**
   Many comments emphasized the need to manage stormwater alongside other council services like roads and wastewater. Keeping these services under one administrative structure was seen as essential for efficiency and coherent planning.
3. **Environmental and Climate Resilience:**
   Submissions supported climate-adaptive and nature-based stormwater solutions, citing the growing impact of extreme weather. There was a call to protect waterways and marine ecosystems through sustainable infrastructure.
4. **Technical Complexity and Planning Challenges:**
   Respondents noted the technical intricacies of stormwater systems, including modelling, regulatory compliance, and integration with land use planning. Concerns were raised about property impacts and the need for locally informed, consistent infrastructure standards.

Council decision

Council resolved on 22 July 2025 that New Plymouth District Council future water services delivery model is:

- An asset owning NPDC WSCCO for drinking water and wastewater services & delivery;
- Stormwater asset ownership and delivery would remain with the Council.

Assurance and adoption of the Plan

Assurance and adoption of the Plan

In addition to internal assurance processes, the following independent reviews have been completed:

- Independent legal review against the requirements in the Act. (TBC)
- DIA technical review and feedback on the draft WSDP

Council resolution to adopt the Plan

This WSDP and the WSDP for the WSCCO will be submitted for adoption by NPDC Council at the meeting of 12 August 2025.

A copy of the resolution will be attached as Appendix A: Council resolution – Adoption of Water Services Delivery Plans.

Certification of the Chief Executive of New Plymouth District Council

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: _____

[Approved by]
Gareth Green
Chief Executive, New Plymouth District Council

Date: _____

Part B: Network performance

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

Investment required in water services

Serviced population

Stormwater services are provided across the district of New Plymouth, which has a serviced population of approximately 87,000 people, the 2023 Census data from Stats NZ.

Serviced areas

Serviced areas (by reticulated network)	Stormwater
Residential areas (If more than one identify separately)	13 Urban Stormwater Catchments in communities of New Plymouth, Bell Block, Waitara, Inglewood, Urenui, Onaero, Lepperton, Egmont Village, Ōākura and Ōkato
Non-residential areas (If more than one identify separately)	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)	n/a
Areas that do not receive water services (If more than one identify separately)	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 24/25 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	0.40
The number of complaints received about the performance of the Council's stormwater system (per 1,000 properties connected)	<8	3.36
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	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 (AMPs).

The 2021 Long-Term Plan (LTP21) projected a spend of $47 million for the 10 year period, with actual year-to-date expenditure reaching 14**%** of that forecast for the first 5 years. The estimated renewals backlog in the current (2025) AMP and based on gross capital replacement cost, is approximately $25 million. NPDC remains committed to the ongoing renewal of its network with the 2024 Long-Term Plan (LTP24) allocating $67 million for renewals for its 10 year period.

Below ground stormwater asset 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. $105K/yr is allocated for stormwater condition assessments. This equates to 4% of the network being inspected per year at current rates.

For critical assets, the Dams are subject to the Building (Dam Safety) Act requirements which captures and addresses condition and renewals. The Mangaotoku diversion tunnel is inspected on a regular basis (2 yearly).

For above ground assets (excluding dams), a number of the assets are routinely inspected (for blockage and the like) but no condition information is recorded. There is no formalised condition assessment program in place for any of the other above ground assets.

There are a number of actions identified within the AMP related to the asset register, criticality, condition assessment and renewals. Some of these actions have progressed while others have been delayed due to restructures and resourcing issues. These will need to be addressed as part of the transition to the new operating model.

The below ground assets are generally considered to be well maintained although some work is needed to identify and incorporate previously undiscovered assets into the maintenance schedule. 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 *(Asset Age is Weighted by the GCRC as at March 2025)*
Critical Assets	*Uncertain* Detention dams Waitara war memorial pumpstation Diversion tunnels Critical pipes (specific pipes that have been identified as where a blockage or failure would lead to significant habitable floor flooding due to the lack of a secondary flow path)
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 38% 0%
Below ground assets • Total Km of reticulation • Percentage of network with condition grading • Percentage of network in poor or very poor condition	 317 Km 96% 10%

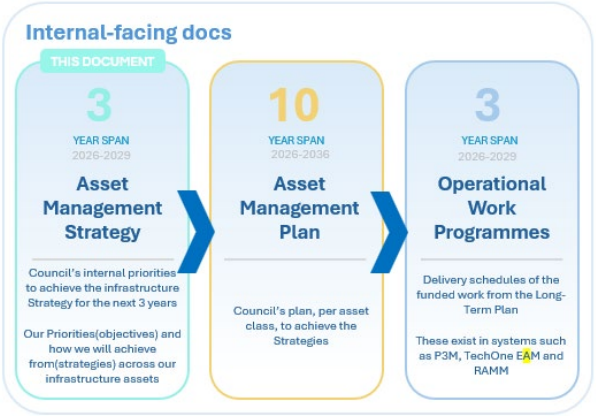
Source: The data in the table is from Taumata Arowai NEPM reporting, as at 30 June 2024.

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

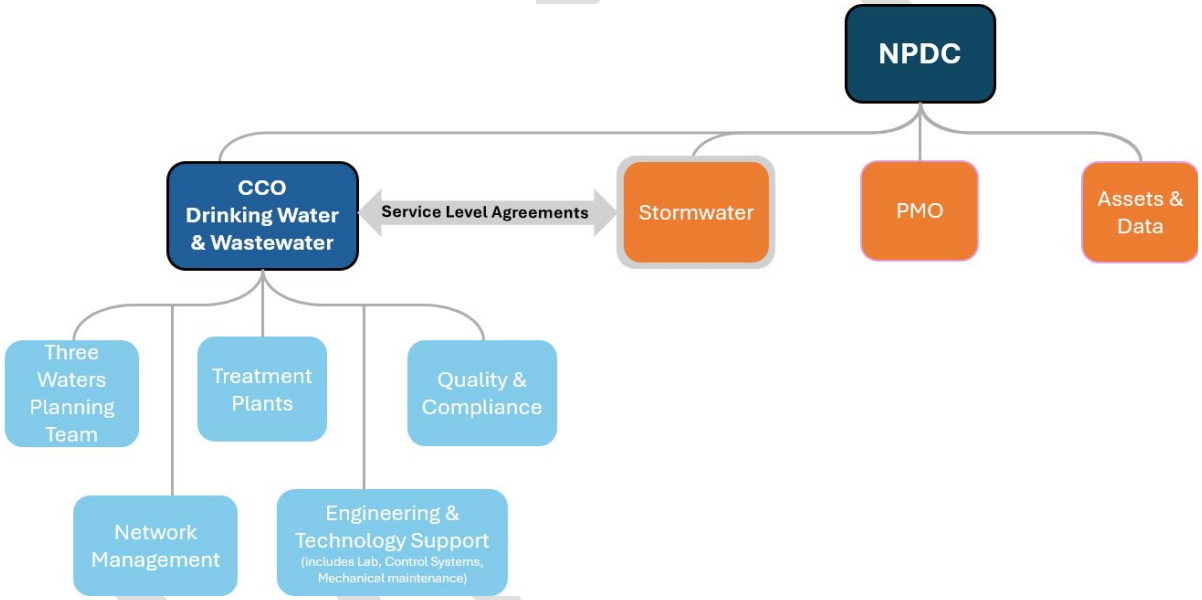
NPDC currently aligns its asset management practices with ISO55001/55002 (Asset Management) and ISO 9001 (Quality Management). This approach is documented through a structured hierarchy of documents illustrated in the figure below. These documents are reviewed and updated every three years, in line with the LTP cycle.



We do not see that this process will change however there will be additional specific external reporting requirements as outlined below.

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 Citycare Ltd 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 Three Waters 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 Portfolio, Program and Project Management (P3M) Framework and handed over to the Projects team for delivery.

Statement of regulatory compliance

Compliance

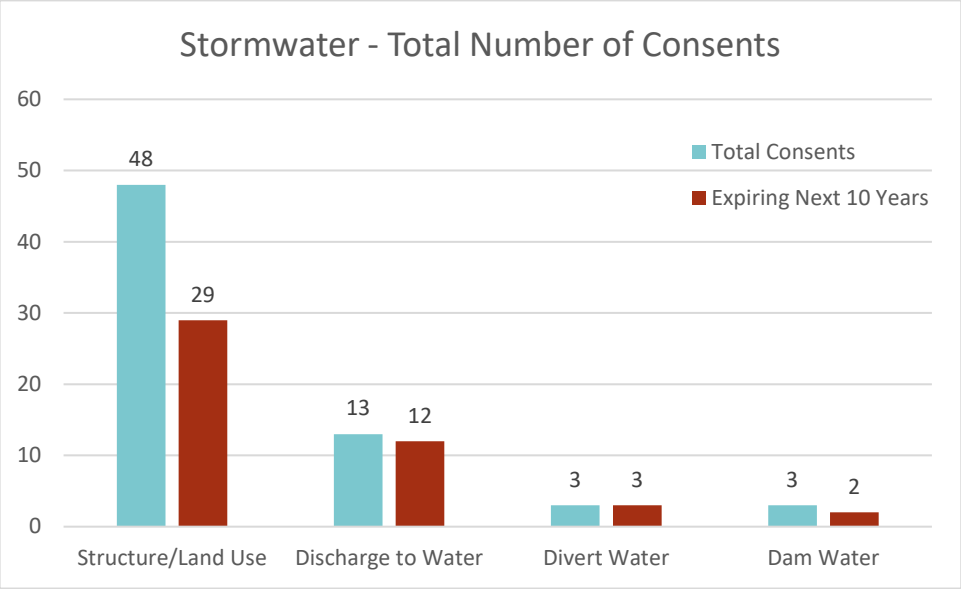
Currently NPDC is compliant with all regulatory requirements with the following exceptions:

- 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.

Resource Consents

NPDC currently holds 67 stormwater related environmental resource consents issued by the Taranaki Regional Council.



Active Resource Consent Applications

There are no active consent applications operating under S124, however there are 14 renewals in process for consents expiring in 2026. Additionally, the following new applications are expected within the year:

- Consent for a culvert being installed as part of Patterson Road project works.
- Multiple stormwater structures associated with the daylighting of the Huatoki Stream in the New Plymouth Central Business District.

Consents requiring renewal in the next 10 years.

NPDC has 46 consents expiring over the next 10 years. Of these, 17 expire in 2026 and are currently being processed internally for application submissions by the end of 2025. All consents are considered to be 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 $300,000 per 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 four 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 of one. 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 Mangaotuku Dams and a spillway upgrade for the Waimea Dam. These works 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 was 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 $300,000 per 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.

Parameters	Stormwater Schemes/catchments
Resource Management	
• Significant consents (note if consent is expired and operating on S124)	Four Discharge to water consents, from industrial areas
• Expire in the next 10 years	[*See above – statement of Regulatory Compliance]*
• Non-compliance:	
◦ Significant risk non-compliance	[N/A]
◦ Moderate risk non-compliance	[N/A]
◦ Low risk non-compliance	[NPDC has four active non-compliances for fish passage that are considered resolved and awaiting signoff]
• Active resource consent applications	[N/A]
• Compliance actions (last 24 months):	
◦ Warning	[N/A]
◦ Abatement notice	[EAC-23405, EAC-23407, EAC-23416, EAC-24647, (fish passage)]

• 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 are spread 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.

NPDC 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 while responding to increased environmental expectations will require substantial investment. This is expected to take generations to address, therefore the investment profile below is one of gradual improvement over the full 30 years 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. Optioneering work for this 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 maximise its effectiveness.
- 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

Table below summarises the projected investment for stormwater.

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

NPDC 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 30-year horizon.

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 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 consenting and other delays.

Delivery against planned investment	Renewals investment for stormwater services ($K)				Total investment in stormwater services ($K)			
	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**

Please note that the FY24/25 values are not yet available at this time of the submission of this report.

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, 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:

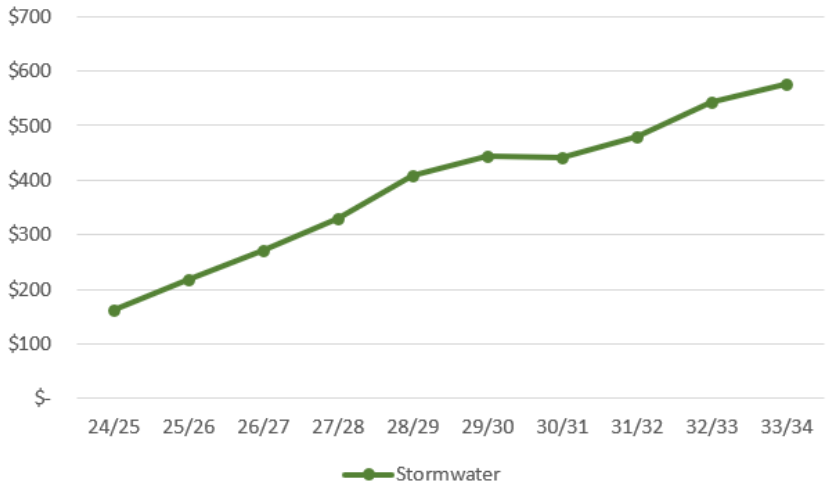
- *General rates* – 50% of the rates requirement comes from general rates.
- *Targeted Rates* - 50% of the rates requirement comes from a targeted rate that only applies to properties in urban areas. This is 0.01206c (excl GST) per dollar of rateable capital value.
- *Development Contributions* - The 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

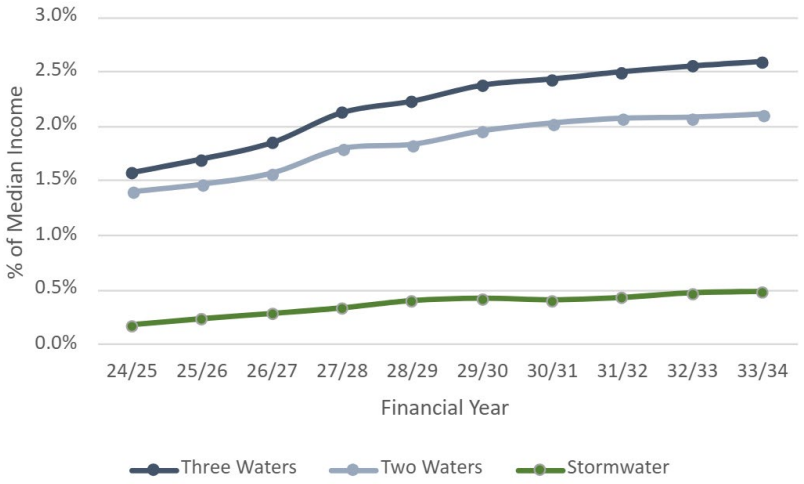
The key projected user charges for stormwater are given in the figure below.



The affordability of projected water services charges for communities

The cost of three waters services is expected to begin at 1.6% of the median household income increasing to 2.7% over 10 years, assuming a 3% annual inflation rate. The accompanying graph reflects the residential user community only, excluding commercial customers.

While this remains below the globally recommended affordability threshold of 4% of household income, it's important to note that approximately 22% of households currently experience affordability challenges. This figure is expected to rise to 35% over the next decade, indicating a growing portion of the community may find water services unaffordable.



Funding and financing arrangements

Funding and financing arrangements

Water services financing requirements and sources

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

For the In House Delivery 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

Insurance Arrangements for Stormwater Assets

Stormwater infrastructure will remain insured under NPDC's existing insurance policies unless a decision is made to transfer the assets to NPDC WSCCO. Coverage terms and renewal periods will continue to align with current Council arrangements.

Insurance Coverage Through LAPP and Disaster Protection

NPDC is a contributing member of the Local Authorities Protection Programme (LAPP), which provides insurance coverage for underground Three Waters assets—including stormwater infrastructure affected by natural disasters. Membership includes protection for up to two qualifying events annually, with coverage capped at $300 million per event. Claims become eligible once damage exceeds $1 million, which includes a $400,000 deductible. NPDC is responsible for payment of this deductible once the threshold is met. The majority of NPDC's insured stormwater assets are covered through LAPP.

Annual Review and Future Risk Assessment

Insurance coverage is reviewed annually based on updated financial valuations as provided by third party valuation experts, with provisions made for asset additions throughout the year. A full insurance risk assessment is scheduled for FY 2026/27.

Seismic Risk Modelling and Resilience Planning

Following the October 2022 update to the National Seismic Hazard Model, the Probable Maximum Loss (PML) cover limit was reset and incorporated into insurance planning. LAPP continues to support risk evaluation and loss modelling for water services assets, enabling informed decision-making and resilience planning.

Insurance Management Policy:

Insurance review policy, delegations and reporting – NPDC has an Insurance Framework that is 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 each year.

Asset identification standards - 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 – The Insurance Framework is aligned with Council's Risk Management Framework which outlines the means by which NPDC identifies, monitors and manages risk. Risks that have been identified as higher than Council's risk tolerance are also documented within the relevant Asset Management Plans to ensure future mitigations are appropriately funded.

Links with Council's disaster policy response to mitigate insurance losses - 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.

Part D: Financial sustainability assessment

Confirmation of financially sustainable delivery of Stormwater services

Financially sustainable Stormwater services provision

Confirmation of financially sustainable delivery of stormwater 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 stormwater 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 stormwater 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.

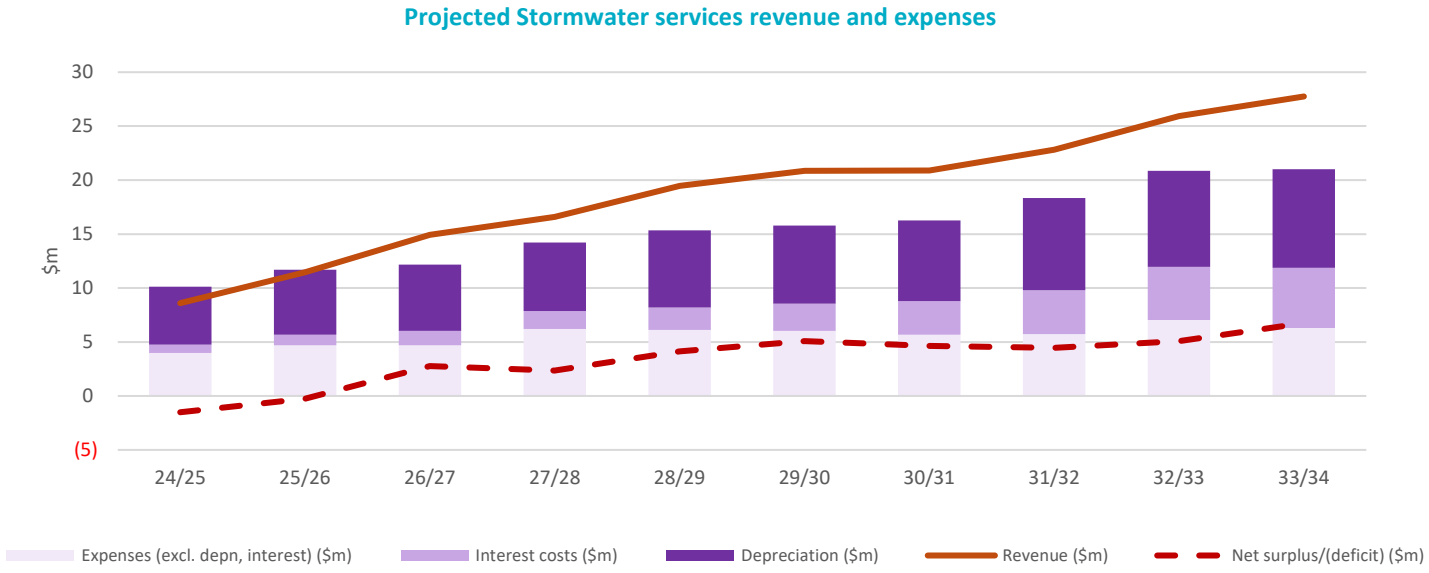
There are no foreseeable constraints on achieving financially sustainable delivery of water services as this is occurring already.

Financially sustainable assessment - revenue sufficiency

Assessment of revenue sufficiency

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

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



Average projected charges for stormwater 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 stormwater services

Operating surplus ratio $K (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 In House Delivery of 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 stormwater 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 In House Delivery 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

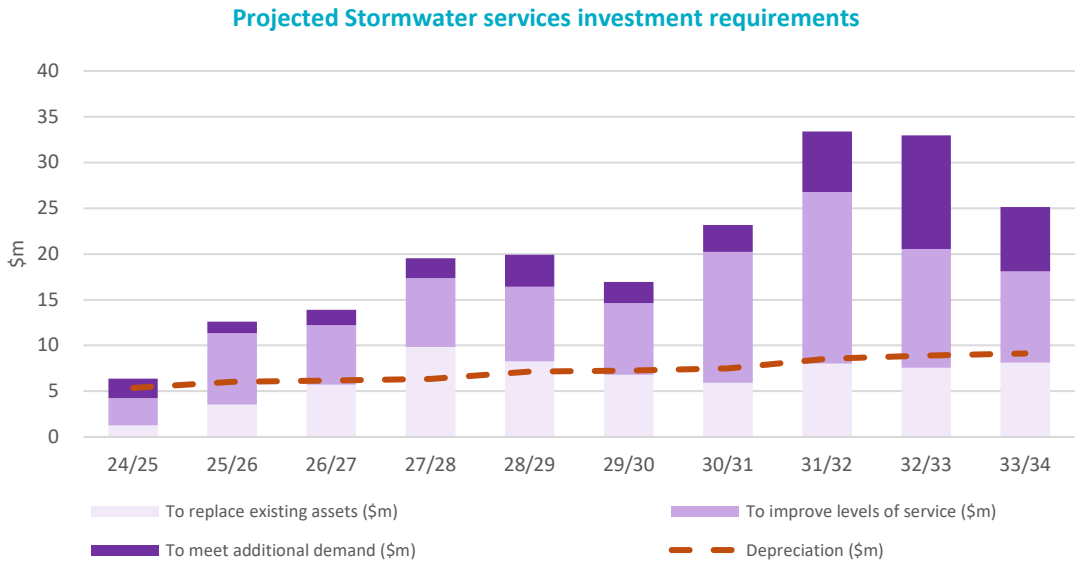
Assessment of investment sufficiency

Projected stormwater 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 stormwater 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.*

As identified above there is an acknowledged backlog of renewals. To address this spending increases from 1.2M to around 8M over the first 5 years. However the driver for the negative asset sustainability ratio from 2030/31 onwards is currently unclear as the method used to determine the renewals budget indicates it should be positive from 2026 onwards. Further work will be required to understand and address this issue. If additional investment is required adequate debt headroom is available to make this affordable if the council were to raise their self imposed interest to revenue limits.

Total stormwater 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.

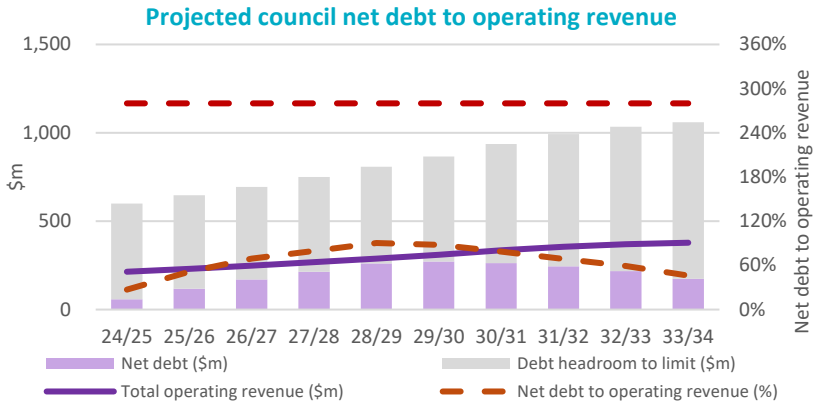
NPDC records remaining life and could calculate a weighted average remaining life.

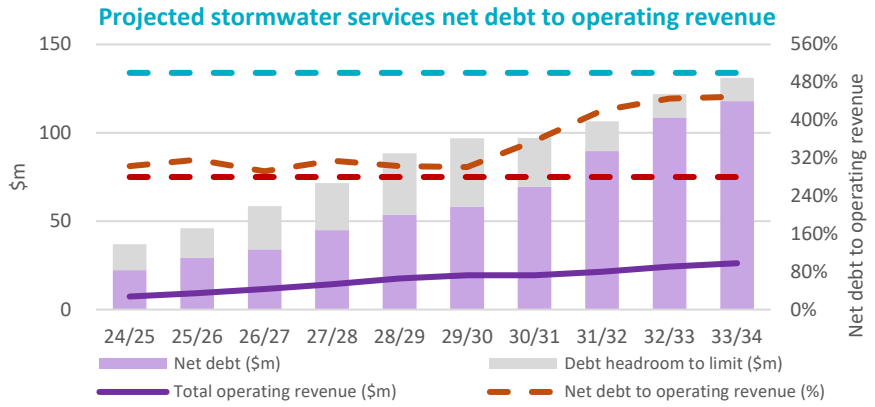
Financially sustainable assessment - financing sufficiency

Assessment of financing sufficiency

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

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





Projected borrowings for stormwater 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 stormwater 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 ($K)	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 stormwater services

Projected statement of cashflows

Projected statement of cashflows - water services($K)	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 ($K)	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 stormwater 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 • Long term issues e.g. providing for growth, climate change	• Growth projection • Ability to adapt to changing legislation without significant funding or process changes • Accuracy of modelling • Climate change