



The Manukau Harbour Consolidated Receiving Environment: Stormwater Management Priorities

Network Discharge Consent

Feedback from the Manukau Harbour Restoration Society
August 6, 2014

INITIAL COMMENTS

1. **Public Input:**

MHRS appreciates the opportunity to provide input into the development of the network discharge consent. We believe that meaningful community engagement in the early stages of a planning process will deliver much better results, most particularly a draft consent that is more closely aligned with the community's desires and thus with less likelihood of protracted opposition and appeals.

2. **Outcomes Guiding the Discharge Consent**

At the heart of this discharge consent is the Manukau Harbour. MHRS believes that the planning process and discharge consent itself would be strengthened considerably if the community were in agreement about the goals - what we're seeking, over the long term, for the harbour and how this consent moves us towards these goals. Council actions and spending priorities would be assessed against these goals or outcomes.

MHRS suggests that the following be used as a starting point for a wider community discussion as to the goals:

- a. To support the progressive improvement and restoration of the Manukau Harbour towards a healthy natural state.
- b. To ensure that any discharges will not prevent any part of the Harbour from meeting recognized standards for:
 - (i) swimming and surface recreation; and
 - (ii) the free breeding and safe human consumption of fin fish and shellfish.
- c. To ensure that any discharges will not negatively effect any feeding areas, breeding or roosting habitats of wading or migratory birds.
- d. To maintain in a natural state as much as possible the natural streams and estuaries of the Manukau Harbour and restore those which have been degraded.

- e. To treat all stormwater prior to discharge into the Manukau Harbour and to use best practices and technologies to improve the quality of and reduce high volume stormwater flows to the harbour, particularly during storm events.
- f. To eliminate all combined storm and wastewater systems and outfalls discharging into the Manukau Harbour; and avoid the creation of new combined storm and wastewater systems or expansion of existing combined systems.
- g. To avoid all diversions of stormwater from other catchments into the Manukau Harbour.
- h. To preserve possibilities for future options to reuse stormwater prior to discharge.
- i. To manage stormwater in ways that recharge aquifers and groundwater as a priority over discharging into the harbour.
- j. To recognize the Tangata Whenua customary and traditional relationships with Manukau Harbour.

3. Watercare

MHRS disagrees with the decision to separate this stormwater discharge consent from the activities of Watercare. Not only does Watercare manage combined storm and wastewater outfalls that discharge into the harbour, Watercare is proposing to divert stormwater that should flow into the Waitemata Harbour to the Manukau Harbour. Both of these activities have enormous impact on the harbour. Standards set for and actions taken in regards to stormwater in the Waitemata catchment will affect the quality of stormwater flowing to the Manukau. These decisions must be integrated.

Stormwater activities of Watercare must be held to at least the equivalent standard as those of private parties whether they are residential, industrial or rural in nature. It is inequitable for private parties to be held to high standards which a public agency can avoid. And in the case of the Manukau Harbour, it makes little sense to require high standards for discharges of private parties if Watercare, responsible for the largest discharges, is degrading the quality of the harbour.

4. What is the Stormwater Unit's Commitment?

The Workshop Handout and Feedback Form says the Stormwater Unit is committed to the vision of Auckland becoming the world's most liveable city and to be a liveable city we need to promote a "water sensitive community". (P1) That seems to be at odds with the Stormwater Unit's proposal to develop the Central Interceptor, a combined storm and wastewater tunnel that will take large volumes of stormwater from the Waitemata catchment and discharge it into the Manukau. And under storm events, this combination of waste and storm water will exceed the capacity of the Mangere Treatment Plant and significant volumes of sewage which has received only primary treatment, will be discharged into the Manukau. How is this moving

Auckland towards being a water sensitive community and the world's most liveable city? What is the Stormwater Unit's commitment to the Manukau?

SUMMARY OF KEY ISSUES

Feedback on Priorities:

- Priority 1 Contamination of the Manukau Harbour: this must include reducing the combined storm and wastewater outfalls into the harbour – in terms of volume discharged and number of outfalls.
- Priority 2 Reducing stormwater effects on the wastewater network -
- Priority 3 Managing our infrastructure/assets: this must include separation of combined wastewater and stormwater systems and upgrading existing systems

ISSUE 1: MANAGING GROWTH

Council must establish policies and standards for stormwater in the Unitary Plan which result in the outcomes listed above, high quality urban development whether greenfields or intensification, and that prevent or minimize adverse effects including on the Manukau Harbour. Of key importance are requiring all new development and intensification projects to separate storm and wastewater and requiring onsite detention, retention and other techniques that clean stormwater and slow its flow to the harbour during storm events.

Auckland Council must take the lead in area-wide stormwater system development but the timing should be driven by development and the costs should be financed by development contributions and fees, not rates.

Rates should only be used for system maintenance and upgrading and improving existing infrastructure and assets.

All four "criteria" or situations should be employed depending on the area and its unique conditions.

ISSUE 2: MANAGING OUR ASSETS

Council must also consider equity – providing service to ratepayers who are paying their rates and have low quality infrastructure. While the problems created may be small on a regional scale (eg little impact on water quality) Council's lack of attention to the issues in these areas leads to low living quality such as damage to roads, driveways and footpaths. A good example is Huia and Cornwallis. These areas should receive Council attention and spending.

Rates and in instances development contributions and special assessments should be used for an ongoing program to separate areas with combined storm and wastewater systems to reduce the volumes flowing to the Mangere Wastewater Treatment Plant and hence the instances when peak flows have to bypass the MWTP and flow partially treated into the Manukau Harbour. To protect the harbour these policies must be enforced in other catchments such as the Waitemata as those storm flows are and are proposed to be, discharged to the Manukau via the Central Interceptor and MWTP.

ISSUE 3: FLOODING

Council's first priority should be to establish policies and standards in the Unitary Plan that ensure new development and infill are built to avoid flooding and maximize onsite retention and detention. Council must enforce these policies and standards. There should be no "illegal infill development" that causes flooding.

Public safety and protecting critical infrastructure should be the priority.

ISSUE 4: MANAGING URBAN STREAMS

Council's first priority should be to establish policies and standards in the Unitary Plan that ensure new development and infill do not degrade streams and that piping of streams is avoided. "Discharges" of contaminants into streams from any activity should be avoided either through onsite treatment or connection to the wastewater system.

Council should be encouraging community involvement in stream rehabilitation.

ISSUE 5: CONTAMINATION OF THE MANUKAU HARBOUR

Council's priorities should be to

- (i) Collect the data that leads to a better understanding of the sources of contamination and their relative importance including the sources of sedimentation and turbidity. The effect of the Mangere Wastewater Treatment Plant and other treatment plants discharging to the harbour must be included in this assessment. Rational policies and actions can then be developed.
- (ii) Reducing both the number of and the volumes flowing from combined wastewater and stormwater outfalls discharging into the harbour.
- (iii) Expand the use of soft design and other technologies at the source to treat stormwater prior to collection and discharge into the Manukau Harbour.
- (iv) Committing to the wet weather treatment plant at MWTP to improve the quality of discharges into the harbour.

- (v) Reducing the number of bypasses of the MWTP during storm events that results in partially treated sewage begin discharged into the harbour.
- (vi) As stated before, committing to an ongoing program of separation of storm and wastewater in areas of the region where they are combined to reduce flows to the MWTP and hence discharges to the Manukau Harbour.

ISSUE 6: MANAGING STORMWATER DISCHARGES TO GROUNDWATER

Maintaining the health of Auckland's aquifers and sources of groundwater must be a Council priority. The first step is for Council to establish policies and standards in the Unitary Plan that ensure this occurs as development and intensification occur. Techniques include onsite and small area detention and retention, soft design solutions and other technologies and controlling the extent of impervious surfaces in critical recharge areas.

ISSUE 7: STORMWATER EFFECTS ON THE WASTEWATER NETWORK

This must be a high priority for Council – whether it is acting as Watercare or the Stormwater Unit. Both divisions of Council should work together to reduce the combined outfalls and the instances of raw sewage being discharged into the Manukau Harbour (eg from the outfall in the Onehunga Foreshore currently under restoration).

Please see also the comments under Issue 5: Contamination of the Manukau Harbour.

It is ironic that on p18 of the document it states that "the drainage system in the Manukau Harbour CRE is separated". Why then is Auckland Council proposing to "combine" the system by bringing combined storm and wastewater from the Waitemata to the Manukau via the proposed Central Interceptor – essentially transferring the problem from the Waitemata to the Manukau? It is taking the Manukau Harbour in a backwards direction.

Thank you for considering our comments.

On behalf of the Manukau Harbour Restoration Society
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